

# IV. Environmental Impact Analysis

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## B. Cultural Resources

### 1. Introduction

This section of the Draft EIR evaluates potential impacts on cultural resources (including archaeological and historical resources) that could result from implementation of the Project. The analysis is based on a Historic Resources Assessment prepared by Environmental Science Associates (ESA), dated July 2019, and a Cultural Resources Assessment, prepared by ESA, dated July 2019. These reports are included as Appendix C and Appendix D of this Draft EIR, respectively. Tribal cultural resources are addressed separately in **Section IV.K, Tribal Cultural Resources**, of this Draft EIR.

### 2. Environmental Setting

#### a) Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, State, and local laws governing and influencing the preservation of cultural resources of national, State, regional, and local significance include:

- The National Historic Preservation Act and National Register of Historic Places;
- The Secretary of the Interior's Standards for the Treatment of Historic Properties;
- Native American Graves Protection and Repatriation Act;
- Archaeological Resources Protection Act;
- Archaeological Data Preservation Act;
- California Environmental Quality Act;
- California Register of Historical Resources;
- California Health and Safety Code;
- California Public Resources Code;
- City of Los Angeles General Plan Conservation Element;

- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171);
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code, Section 12.20.3)
- City of Los Angeles Historic Resources Survey

## (1) Federal

### (a) *National Historic Preservation Act and National Register of Historic Places*

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment”.<sup>1</sup> The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.<sup>2</sup>

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.<sup>3</sup> A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district’s significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;

<sup>1</sup> 36 Code of Federal Regulations (CFR) 60.

<sup>2</sup> United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Questions, <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>, accessed January 29, 2021.

<sup>3</sup> United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 5.

- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.<sup>4</sup>

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.

A resource that is listed in or eligible for listing in the National Register is considered “historic property” under Section 106 of the National Historic Preservation Act.

*(i) Criteria*

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.<sup>5</sup>

<sup>4</sup> United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, page 12.

<sup>5</sup> United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 8.

*(ii) Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific ... property or site is understood and its meaning ... is made clear.”<sup>6</sup> A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

*(iii) Integrity*

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as “the ability of a property to convey its significance”.<sup>7</sup> The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. Some buildings or features may be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

*(iv) Criteria Considerations*

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Consideration A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.<sup>8</sup> Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper

<sup>6</sup> United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pages 7 and 8.

<sup>7</sup> United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 44.

<sup>8</sup> United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 25.

evaluation of their historical importance.<sup>9</sup> The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

*(b) The Secretary of the Interior's Standards for the Treatment of Historic Properties*

The National Park Service issued the Secretary of the Interior's Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary of the Interior's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary of the Interior's Standards for Rehabilitation provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

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

<sup>9</sup> United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 41.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.<sup>10</sup>

It is important to note that the Secretary of the Interior's 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, and it is not necessary for a project to comply with every Standard to achieve compliance.

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<sup>10</sup> United States Department of the Interior, National Park Service, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, 2017.

(c) *Native American Graves Protection and Repatriation Act*

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.<sup>11</sup>

(d) *Archaeological Resources Protection Act*

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.<sup>12</sup>

(e) *Archaeological Data Preservation Act*

The Archaeological Data Preservation Act (ADPA) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

## (2) State

(a) *California Environmental Quality Act*

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified at Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under PRC Section 21084.1, 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. The CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) are administrative regulations interpreting the CEQA statute and published court decisions.

The CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical

<sup>11</sup> United States Department of the Interior, National Park Service, Native American Graves Protection And Repatriation Act, <https://www.nps.gov/archeology/tools/laws/nagpra.htm>, accessed February 10, 2021.

<sup>12</sup> United States Department of the Interior, National Park Service, Technical Brief 20: Archeological Damage Assessment: Legal Basis and Methods, 2007.

Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts 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 by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2 a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.<sup>13</sup> If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.<sup>14</sup>

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<sup>13</sup> Public Resources Code (PRC), Section 21083.1(a), [http://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=PRC&sectionNum=21083.2](http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=21083.2), accessed January 29, 2021.

<sup>14</sup> California Environmental Quality Act (CEQA) Guidelines, Section 15064.5(c)(4).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired”.<sup>15</sup> According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have mitigated its impacts to historical resources to a less-than-significant level.<sup>16</sup>

*(b) California Register of Historical Resources*

The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change”.<sup>17</sup> The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.<sup>18</sup> Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be

<sup>15</sup> CEQA Guidelines, Section 15064.5(b)(1).

<sup>16</sup> CEQA Guidelines, 15064.5(b)(3).

<sup>17</sup> PRC, Section 5024.1[a].

<sup>18</sup> PRC, Section 5024.1[b].

significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

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

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

(c) *California Health and Safety Code*

California Health and Safety Code Section 7050.5, 7051, and 7054 prohibit interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

(d) *California Public Resources Code*

PRC Section 5097.98, as amended by Assembly Bill (AB) 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and has inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

(3) Local

(a) *City of Los Angeles General Plan Conservation Element*

The Conservation Element of the City of Los Angeles General Plan (Conservation Element) was adopted in September 2001. Section 3 of the Conservation Element includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect

important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>19</sup>

In addition to the National Register and the California Register, two types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

*(b) City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)*

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five commissioners, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The four criteria for HCM designation are stated below:

- The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community is reflected or exemplified; or
- The proposed HCM is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.<sup>20</sup>

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and Office of Historic Resources (OHR) staff often ask the following questions:

<sup>19</sup> City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5.

<sup>20</sup> City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a “master” architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained “integrity”? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Check List, as specified in Section 19.05 of the LAMC. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”<sup>21</sup>

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<sup>21</sup> City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

(c) *City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code, Section 12.20.3)*

The Los Angeles City Council adopted the ordinance enabling the creation of HPOZs in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles' first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.<sup>22</sup> Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.<sup>23</sup> For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

(d) *City of Los Angeles Historic Resources Survey*

SurveyLA is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field

<sup>22</sup> City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

<sup>23</sup> City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by Community Redevelopment Agencies. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

## **b) Existing Conditions**

The following Existing Conditions is summarized from the Historic Resources Assessment prepared by ESA, dated July 2019, and the Cultural Resources Assessment prepared by ESA, dated January 2019, both of which are provided in Appendix C and D, respectively. These reports contain additional existing conditions detail.

The Project Site is presently developed with a 5,738 square-foot, vacant educational building, and an 8,225 square-foot Big 5 Sporting Goods store and associated surface parking lot on an approximately 0.76-acre (33,060 gross square feet, 32,290 net square feet) site located at 650–676 South San Vicente Boulevard. The Project Site is located at the northeast corner of Wilshire Boulevard and South San Vicente Boulevard, in an urbanized area adjacent to commercial, office, residential, and medical related uses.

## (1) Prehistoric Setting

The earliest evidence of occupation in the Los Angeles area dates to at least 9,000 years before present (B.P.) and is associated with a period known as the Millingstone Cultural Horizon.<sup>24,25</sup> Departing from the subsistence strategies of their nomadic big-game hunting predecessors, Millingstone populations established more permanent settlements. These settlements were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources including seeds, fish, shellfish, small mammals, and birds were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 years B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of Millingstone culture persisted, by 3,500 years B.P. a number of socioeconomic changes occurred.<sup>26,27,28</sup> These changes are associated with the period known as the Intermediate Horizon.<sup>29</sup> Increased populations in the region necessitated the intensification of existing terrestrial and marine resources.<sup>30</sup> The Intermediate Horizon marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Archaeological evidence suggests that the margins of numerous rivers, marshes, and swamps within the Los Angeles River Drainage served as ideal locations for prehistoric settlement during this period. These well-watered areas contained a rich collection of resources and are likely to have been among the more heavily trafficked travel routes.

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the contemporary

<sup>24</sup> E.J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology*, 1995, 11(3): 214-230.

<sup>25</sup> C.N. Warren, "Cultural Traditions and Ecological Adaptation on the Southern California Coast," in *Archaic Prehistory in the United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology, 1968, 1(3):1-14.

<sup>26</sup> Jon M. Erlandson, *Early Hunter-Gatherers of the California Coast* (New York: Plenum Press, 1994), pages 45-46.

<sup>27</sup> E.J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology*, 1995, 11(3): 214-230.

<sup>28</sup> C.N. Warren, "Cultural Traditions and Ecological Adaptation on the Southern California Coast," in *Archaic Prehistory in the United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology, 1968, 1(3): 1-14.

<sup>29</sup> E.J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology* 11(3): 214-230.

<sup>30</sup> Jon M. Erlandson, *Early Hunter-Gatherers of the California Coast* (New York: Plenum Press, 1994), pages 6 and 276.

Native American group known as the *Gabrielino*.<sup>31</sup> The *Gabrielino* occupied the southern Channel Islands and adjacent mainland areas of Los Angeles and Orange Counties. Maps produced by early explorers indicate that at least 26 *Gabrielino* villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.<sup>32</sup>

## (2) Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Takic-speaking Gabrielino Indians. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.<sup>33</sup> The Gabrielino were hunter-gatherers who lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering.

There were possibly more than 100 mainland villages and Spanish reports suggest that village populations ranged from 50 to 200 people.<sup>34</sup> Prior to actual Spanish contact, the Gabrielino population had been decimated by diseases, probably spread by early Spanish maritime explorers. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.<sup>35</sup> Villages are reported to have been the most abundant in the San Fernando Valley, the Glendale Narrows area north of downtown Los Angeles, and around the Los Angeles River’s coastal outlets.<sup>36</sup> A map of Gabrielino villages, based on documents from the Portola expedition in 1769 and other ethnographic records, indicates that the closest Gabrielino site to the Project Site is the village and sacred site of *Kawegna*, the source of the name for Cahuenga Boulevard. This site is located approximately five to six miles north of the Project Site in the general area of Toluca Lake and Universal City. The next closest village to the Project Site is

<sup>31</sup> E.J. Wallace, “A Suggested Chronology for Southern California Coastal Archaeology,” *Southwestern Journal of Anthropology* 11(3): 214-230

<sup>32</sup> Blake Gumprecht, *Los Angeles River: Its Life, and Possible Rebirth* (Baltimore: The Johns Hopkins University Press, 2001), page 26.

<sup>33</sup> A.L. Kroeber, *Handbook of the Indians of California* (New York: Dover Publications, Inc., 1925, reprinted 1976), page 620.

<sup>34</sup> Lowell J. Bean, and Charles R. Smith, “Gabrielino, in California,” in *Handbook of North American Indians*, Vol. 8, edited by R.F. Heizer and W. C. Sturtevant, general editor, 1978, pages 538-549.

<sup>35</sup> A.L. Kroeber, *Handbook of the Indians of California* (New York: Dover Publications, Inc., 1925, reprinted 1976), page 620.

<sup>36</sup> Blake Gumprecht, *Los Angeles River: Its Life, and Possible Rebirth* (Baltimore: Johns Hopkins University Press, 1999), page 31.

the village of *Maungna*, which was once situated at the current location of Rancho Los Feliz, about six to seven miles east of the Project Site.<sup>37</sup>

### (3) Historical Setting

The early Spanish settlers in El Pueblo de Los Angeles used the Tongva trails, and referred to the major trail between *Yangna* village and the La Brea Tar Pits as El Camino Viejo (“old road”) and also as La Brea Road. During the Spanish period, this road lay between Rancho La Brea to the north and Rancho Las Cienegas to the south. It later became Wilshire Boulevard, an iconic and influential commercial corridor.<sup>38</sup>

During most of the 19th century, ranchers grazed cattle and sheep in open pastures, and farmers grew crops like barley and wheat, in the Wilshire Community Plan Area (CPA). Much of the land that is now part of the Fairfax and Beverly Grove neighborhoods (most commonly referred to as Beverly-Fairfax) was originally part of Rancho La Brea. Most of the Salt Lake Oil Field underlies neighborhoods in the northwestern portion of the Wilshire CPA, which once had been covered with oil derricks. The La Brea Tar Pits are a surface manifestation of this vast underground resource. In 1900 rancher A.F. Gilmore began oil exploration on the small piece of the rancho he had acquired.<sup>39</sup>

By the 1910s, Gilmore and his son E.B. Gilmore realized that residential and commercial development was more profitable than oil production. By the early 1930s, most of the land in the Fairfax neighborhood, north of Wilshire Boulevard, had been subdivided and thoroughly developed. Gilmore sold off the less productive portions of his land. The Beverly-Fairfax development was automobile-focused, since it was outside of the Los Angeles Railway’s streetcar system. New neighborhood subdivisions in the Beverly-Fairfax area were developed. Many of these were two-story duplexes and fourplexes in a variety of Period Revival styles and constructed from the mid-1920s to the early 1930s. A prominent, unusually intact, and somewhat late example of an apartment house district is Beverly Square, constructed in the 1930s and 1940s.<sup>40</sup>

Starting in 1922, J. Harvey McCarthy planned Carthay Center (later Carthay Circle) as a subdivision of mostly one-story, Period Revival single-family residences and

<sup>37</sup> William, McCawley, *The First Angelinos: The Gabrielino Indians of Los Angeles* (Banning, CA: Malki Museum Press, 1996), page 55.

<sup>38</sup> Architectural Resources Group, *Historic Resources Survey Report: Wilshire Community Plan Area*, page 10.

<sup>39</sup> Architectural Resources Group, *Historic Resources Survey Report: Wilshire Community Plan Area*, page 18.

<sup>40</sup> Architectural Resources Group, *Historic Resources Survey Report: Wilshire Community Plan Area*.

some multi-family housing. The development included commercial and institutional elements, such as the Carthay Circle Theater. The subdivision's layout created a distinctive sense of place by breaking with the surrounding street grid to form an irregular street pattern around San Vicente Boulevard that emphasized pedestrian access. Carthay Circle's deed restrictions barred non-whites from owning property, prohibited flat roofs, and mandated design review of new construction by a homeowners' association.<sup>41</sup>

In 1934, Fred Beck and Roger Dahlhjelm opened the Farmers Public Market at West Third Street and Fairfax Avenue (on land owned by E.B. Gilmore), where local farmers sold their produce out of their trucks. Soon, buildings were constructed at the location and restaurants, ice cream stands, flower shops, and other retail stores began selling at the market. The Farmers Market still exists in its original location. It once included a drive-in movie theater, a racetrack, and a stadium.<sup>42</sup>

The area saw little commercial development during World War II. In the postwar years, large office buildings for high-profile corporations were constructed along Wilshire Boulevard. New York developer Norman Tishman was the first to build large office buildings along Wilshire Boulevard and, soon after, many other developers joined him, making the area well-known as a business center. The postwar period saw a shift in the area's architecture to sleek Modern styles. Prudential Tower (now Museum Square), designed by Welton Becket's firm in 1948 for Prudential Insurance, was the first example of the International Style in the Wilshire CPA. The 1957 lifting of the City's 150-foot height limit restriction led to skyscrapers, bringing an important change to the skyline.<sup>43</sup>

The Project Site itself is associated with the Regional Commercial Centers and Corridors (1875–1980) SurveyLA theme, which is discussed below:

*One commercial historic district and six commercial planning districts were identified along major arterial corridors (including 3rd Street, Beverly Boulevard, Fairfax Avenue and Pico Boulevard) throughout the Wilshire CPA. All were developed predominantly between the 1920s and 1940s, with most in relation to automobile travel; however, they are also located on or near historic streetcar and motorcoach lines and are pedestrian-oriented (they are low scale, maintain storefronts with large display windows, and have limited on-site*

<sup>41</sup> Architectural Resources Group, Historic Resources Survey Report: Wilshire Community Plan Area, page 10

<sup>42</sup> Architectural Resources Group, Historic Resources Survey Report: Wilshire Community Plan Area, page 18.

<sup>43</sup> Architectural Resources Group, Historic Resources Survey Report: Wilshire Community Plan Area, page 13.

*parking). The Beverly Boulevard Commercial Historic District is located roughly between North Detroit Street and North Stanley Avenue, in the Beverly-Fairfax neighborhood. The commercial planning districts have endured alterations and infill over the years and do not appear to be eligible as historic districts due to compromised integrity; however, they may merit special consideration in the planning process.<sup>44</sup>*

#### (4) Architectural Themes

The architectural themes presented in this section are relevant to the single historic-period building on the Project Site, discussed further below. However, this building was originally two separate buildings, which were subsequently joined. For this reason, two architectural themes are appropriate. These themes provide the context against which the building was evaluated for listing in the California Register.

##### (a) *Streamline Moderne (1934–1945)*

The first building constructed onsite was originally an example of the Streamline Moderne style. Following the height of Art Deco in the early 1930s, the Streamline Moderne style was an economic and stylistic response to the ravaging effects of the Great Depression. Streamline structures continued to suggest modern values of movement and rejection of historic precedents, but with far less opulence and more restraint than Art Deco of the late 1920s and early 1930s. Yet the Streamline Moderne differed from the “High Art Modern Architecture” of the early 1930s in that it “continued to regard design as ‘styling’ and that architecture should represent or perform as an image rather than be used as a space to radically change one’s everyday life. Proponents of Streamline Moderne argued that their purpose was not to create an architecture that functioned in the same way as the ocean liner, airplane, or locomotive; rather, the buildings would symbolize those things and, therefore, remind one of the ‘modern’ future.”<sup>45</sup> Streamline Moderne architecture took its cue from the emerging field of industrial design and borrowed imagery from transportation, in particular, the ocean liner.

Popular between 1934 and 1945, character-defining features of Streamline Moderne style include horizontally oriented masses, flat rooflines with coping or flat parapets, smooth stucco or concrete exteriors, relatively unadorned and unornamented surfaces, curved end walls and corners, glass block and porthole windows, windows “punched” into walls, flat canopies over entrances, pipe railings

<sup>44</sup> Architectural Resources Group, Historic Resources Survey Report: Wilshire Community Plan Area, page 25.

<sup>45</sup> Patrick Pascal, Kesling, Modern Structures Popularizing Modern Design in Southern California 1934-1962, 2002, page 10.

used along staircases and balconies, grooved moldings and stringcourses, and steel sash windows.

(b) *Mid-Century Modern Architecture (1945-1970)*

The second building constructed onsite is an example of the Mid-Century Modern architectural style. In the post-World War II period in America, Modern architecture became the predominant architectural style applied to buildings of every type. During the 1950s and 1960s, distinct and identifiable stylistic variants of Modernism evolved. The aesthetic closest to the 1920s origins of Modernism in Europe was dubbed the International Style and was identified by its rectilinear form, flat roofs, open floor plans, use of steel and glass, and lack of applied ornamentation. Local variants of Modern design, while based upon International Style tenets, were generally less formal in their expression of Modernist tenets with results that vary widely in terms of materials, form, and spatial arrangements. Mid-Century Modern architecture is more organic and less structured than the International Style. It is characterized by more solid wall surfaces and emphasis is often placed on stylized architectural focal points/features.

Mid-Century Modern design used sleek, simplified geometry and asymmetrical, intersecting angular planes of masonry volumes and glass curtain walls, locked together by a flat planar roof. Designers embraced the optimistic spirit of the time, experimenting with the newest technologies and materials in building, such as concrete and aluminum, and incorporating futuristic elements. The features of the Mid-Century Modern style are simple geometric forms, post-and-beam construction, flat or low-pitched gabled roofs, flush mounted steel framed windows or large single-paned wood-framed windows, and brick or stone often used as primary accent material.

(5) Identification of Historical Resources within the Project Site

As discussed further in the Historic Resources Assessment, provided in Appendix C of this Draft EIR, a Project Site visit was conducted by a qualified ESA architectural historian to identify historical resources over 45 years in age on the Project Site and in the vicinity and to assess potential Project impacts on such resources.

Currently there are two buildings on the Project Site: 1) located at 650-658 South San Vicente Boulevard, which is currently vacant, but was a former Montessori Children's World preschool (referred to herein as Building 1) and 2) located at 6601 Wilshire Boulevard, which currently includes a Big 5 Sporting Goods store (referred to herein as Building 2).

Historically, Building 1 was originally two separate buildings (located at 650 South San Vicente Boulevard and 658 South San Vicente Boulevard) built in two

separate architectural styles. These two buildings were connected by 2003 and, thereafter, were used as single-use building (most recently the Montessori preschool). Constructed in 1977, Building 2 is less than 45 years old and, thus, does not meet the age threshold as defined by the OHP. The following discussion, then, focuses on Building 1, though a more detailed discussion can be found in the Historic Resources Assessment (Appendix C).

Building 1 is located directly adjacent to Orange Street and South San Vicente Boulevard. The one-story building features an irregular footprint consisting of two separately constructed office buildings that have been connected and are currently used as one building. A flat roof with composite sheets covers both building sections. Overall, the combined building does not reflect its separate, original architectural styles. The first building constructed as part of Building 1 (referred to herein as Building 1-A) was constructed in 1945. It is a one-story frame and stucco building with an irregular-shaped footprint and is covered by a flat, composition sheet roof. A parapet stucco wall is used for signage. The building's original design appears to have had Streamline Moderne influences with a curved corner wall and glass block window. The trim detail on the bottom of the parapet wall appears to have originally been a Streamline Moderne-style comprising horizontal speed stripe meant to portray fluidity and motion. The main entrance faces South San Vicente Boulevard and features an addition of a porch-like flat arcade of wood board and thin wood piers, constructed in 1965. The secondary façade of Building 1-A includes about two-thirds of the lot. The stucco wall is topped by exterior trim that continues from the south façade and features four large replacement reflective glass windows.

The second building constructed as part of Building 1 in 1951 (referred to as Building 1-B herein) is located to the southeast of Building 1-A and was constructed of reinforced brick in a Mid-Century Modern style. The bottom half of the south façade is concrete block in stack bond and the top half is painted concrete.<sup>46</sup> At the top of the building on the San Vicente Boulevard side is a continuation of the parapet from the adjacent building, which was likely added in 1995 when the parapets were damaged and subsequently seismically repaired. The secondary façade of Building 1-B is composed of concrete block masses with a recessed cut-out that is covered by a canopy with coping. The facade is obscured from the street by gates to a surface parking lot for staff on the adjacent lot. As detailed in the Historic Resources Assessment, when assessed against the architectural themes presented above, as well as occupation history and other factors, it has been determined that Building 1 lacks significance as it does not appear to have a significant association with early development patterns in the Project vicinity or the productive lives of historic personages, and does not possess architectural merit. As such, the property was found ineligible under all of the applicable federal, State, and local criteria. Furthermore, Building 1 does not

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<sup>46</sup> In brickwork, a patterned bond where the facing brick is laid with all vertical joints aligned.

qualify as a contributor to a potential historic district. Therefore, Building 1 is not eligible for listing in the National Register, California Register or as a City of Los Angeles HCM or as a contributor to a potential district or HPOZ and is not considered a historical resource pursuant to CEQA, or by any measure beyond CEQA.

#### (6) Historical Resources within the Project Vicinity

In addition to an assessment of buildings on the Project Site, potential indirect impacts to adjacent and nearby historical resources were also assessed. The indirect impacts study area was defined as 0.25 miles from the Project Site, which provides a reasonable assessment of nearby potentially historic buildings, given the dense, urban setting with limited sight distance from the Project Site. The historical resources identified below include those resources that have been identified by a survey but not designated as a landmark, in addition to those designated as a local HCM, California Register historical resource, or National Register historic property. In the City of Los Angeles, some of the resources are designated as an HCM or are located within a district or HPOZ. In the City of Beverly Hills, one of the resources is designated as a Historic Landmark. Historical resources that possess direct and indirect views of the Project Site may have the potential to be indirectly altered by the Project and are described in the analysis presented below. Based on a review of the National Register of Historic Places, the California Register of Historic Places, CHRIS, and SurveyLA, a total of 11 historical resources were identified within 0.25 miles of the Project Site, of which nine would have direct views of the Project, one would have indirect views of the Project, and one would have no views of the Project. These are provided in **Table IV.B-1, *Historical Resources Located within 0.25-miles of the Project Site***.

While the Project's large scale would alter the low-rise setting of the Project Site, contemporary multi-story and high-rise, non-historic built resources have already been introduced into the Project vicinity including 6400 Wilshire (mid-rise) to the west, 6500 Wilshire (high-rise) to the east, 8200 Wilshire (mid-rise) across Wilshire to the east, 8833 Wilshire (high-rise) across Wilshire to the west. Furthermore, Wilshire Boulevard is characterized by a wide variety in scale ranging from small low-rise commercial storefronts to large high-rise office buildings. Below is a discussion of the viewshed analyses conducted for each of the resources with a view of the Project Site.

**TABLE IV.B-1  
HISTORICAL RESOURCES LOCATED WITHIN 0.25 MILES OF THE PROJECT SITE**

<b>No.</b>	<b>Name</b>	<b>Address</b>	<b>Description</b>	<b>CHR Status Code(s)</b>	<b>Date Recorded</b>	<b>Distance from Project Site</b>	<b>View of Project Site</b>
1	N/A	San Vicente Boulevard between Stanley Avenue and Wilshire Boulevard, Los Angeles	Landscaped median constructed between 1955 and 1961 after removal of the Los Angeles Railway streetcar tracks. Recorded as three segments (this is segment two of three). It is a prominent visual landmark that appears to meet local criteria only and may not meet significance thresholds for National Register or California Register eligibility.	5S3	1/26/2015	Middle of San Vicente Blvd, 0.03 mile (139 feet)	Direct View
2	N/A	San Vicente Boulevard between Wilshire Boulevard and Oakhurst Drive, Los Angeles	Landscaped median constructed between 1955 and 1961 after removal of the Los Angeles Railway streetcar tracks. Recorded as three segments (this is segment three of three). It is a prominent visual landmark that appears to meet local criteria only and may not meet significance thresholds for National Register or California Register eligibility.	5S3	1/26/2015	0.02 mile (103 feet)	Direct View
3	6th Street-Orange Street Multi-Family Residential Historic District	Along West 6th Street and West Orange Street, between South San Vicente Boulevard and South Fairfax Avenue, Los Angeles	221 parcels containing two-story, multi-family residences. The dominant period of development for the district is 1915 to 1954, and most apartments are constructed in the Spanish Colonial Revival (several with Moorish Revival characteristics) and Mediterranean Revival styles, with some in the French Revival and Minimal Traditional styles.	3S, 3CS, 5S3 District not designated; 3 HCMs within the district: 6400 West Orange Street (No. 1192), 6401 West Orange Street (No. 1193), and 6606 W Maryland Drive (No.923)	1/26/2015	0.01 mile (70 feet)	Indirect View
4	Carthay Circle	Centered around McCarthy Vista, Foster and Cabrillo Drives, north of Olympic Boulevard, west of Fairfax Avenue, along Schumacher Drive on the west, all along San Vicente Boulevard, and along Warner Drive on the north, Los Angeles	Neighborhood developed between 1922 and 1944 with underground utilities. Most single-family residences are in the Spanish Colonial Revival style. Some are in Tudor, French, and American Colonial Revival styles.	5S1 Carthay Circle Historic Preservation Overlay Zone effective July 24, 1998	7/24/1998	0.03 mile (153 feet)	Direct View

**TABLE IV.B-1  
HISTORICAL RESOURCES LOCATED WITHIN 0.25 MILES OF THE PROJECT SITE**

<b>No.</b>	<b>Name</b>	<b>Address</b>	<b>Description</b>	<b>CHR Status Code(s)</b>	<b>Date Recorded</b>	<b>Distance from Project Site</b>	<b>View of Project Site</b>
5	N/A	6535 West Wilshire Boulevard, Los Angeles	Excellent example of American Colonial Revival commercial architecture on Wilshire's Miracle Mile.	3S, 3CS, 5S3	1/26/2015	0.01 mile (57 feet)	Direct View
6	N/A	560 South San Vicente Boulevard, Los Angeles	Excellent example of Streamline Moderne multi-family residential architecture in the Wilshire area.	3S, 3CS, 5S3	1/26/2015	0.16 mile (855 feet)	Direct View
7	Clock Drive-In Market	8423 Wilshire Boulevard, Beverly Hills	One of the best examples of Spanish Colonial Revival architecture on Wilshire Boulevard.	3S, 3CS, 5S1	6/21/2016	0.14 mile (718 feet)	No View
8	Fox Wilshire-Saban Theater	8440-8444 Wilshire Boulevard, Beverly Hills	Art Deco style theater designed by master architect South Charles Lee and associated with the cultural and recreational history of Beverly Hills.	1S, 5S1 Beverly Hills Landmark No. 13; National Register	5/8/2013	0.14 mile (744 feet)	Direct View
9	N/A	8400 Wilshire Boulevard, Beverly Hills	Art/Deco style corner commercial building. Designed by Frank Stieff. Built in 1935. Contributor to potential Art Deco/Moderne Architecture District.	3CD	6/9/2006	0.12 mile (639 feet)	Direct View
10	N/A	8383 Wilshire Boulevard, Beverly Hills	Modern "Y-shaped" office building. Contributor to the potential Post World War II Modern Commercial Office Building District	3CD	6/9/2006	0.03 mile (175 feet)	Direct View
11	Great Western Savings	8484 Wilshire Boulevard, Beverly Hills	One of the first buildings designed with computer-aided design and designed by master architect William Pereira. Appears individually eligible and Contributor to potential Post World War II Modern Commercial Office Building District.	3CB	6/9/2006	0.18 mile (938 feet)	Direct View

SOURCE: ESA, 2020.

### **6535 West Wilshire Boulevard**

The closest historic resource is a two-story American Colonial Revival building across South Sweetzer Avenue from the Project Site at 6535 West Wilshire Boulevard. While the Project would affect the setting of 6535 West Wilshire Boulevard, as it would be introducing a change in scale on the Project Site from one to 12 stories, the setting of this historic resource has already been altered by another 12-story building, the Jewish Federation Goldsmith Center, at 6505 Wilshire Boulevard. The immediate setting of the Project Site is the Jewish Federation Goldsmith Center's one-story visitor parking adjacent to 6535 West Wilshire Boulevard. Further, as the 6535 West Wilshire Boulevard building is across the street from the Project Site, the immediate neighborhood setting and scale for its block would be preserved. The setting has also been altered by a billboard at an approximately five-story height that rises from the courtyard of 6535 West Wilshire Boulevard. Finally, SurveyLA does not consider the setting one of the essential integrity considerations for an American Colonial Revival commercial building like 6535 West Wilshire Boulevard.

The main views of 6535 West Wilshire Boulevard are from the east along Wilshire and San Vicente Boulevards. The full visual appearance of the historic building from this direction along both boulevards will be preserved. The Project would block views of 6535 West Wilshire Boulevard from the west along Wilshire Boulevard. However, existing views from the west are partial due to an existing City of Beverly Hills vertical sign and the 8383 Wilshire Boulevard building. Adverse alterations from the west resulting from the Project would be minor as the existing view is limited. There is no view of 6535 West Wilshire Boulevard from approximately two blocks further west along San Vicente Boulevard, as the view of the historic building is blocked by existing two-story buildings and the trees of the San Vicente Boulevard median. Therefore, upon Project completion, the resource at 6535 West Wilshire Boulevard would still retain its eligibility and would still be visible within the streetscape and urban context and indirect impacts would not be significant.

### **8383 Wilshire Boulevard**

Across San Vicente Boulevard from the Project Site is 8383 Wilshire Boulevard, an 11-story modern "Y-Shaped" office building surveyed as part of the *City of Beverly Hills Historic Resources Survey Report (Survey Area 5: Commercial Properties)*, prepared by Jones & Stokes, in 2007. The 8383 Wilshire Boulevard is the most prominent building at the intersection of South San Vicente Boulevard and Wilshire Boulevard. The height of the Project would potentially alter the setting of 8383 Wilshire Boulevard. At 12 stories, the Project would be the tallest building in the immediate area and would shift the scale of the setting. However, the character-defining scale, setback, and massing of 8383 Wilshire Boulevard, and the main character-defining viewsheds of 8383 Wilshire Boulevard from the west along San Vicente and Wilshire Boulevards would be retained. Therefore, it would

maintain its eligibility as a historic resource and indirect impacts would not be significant.

### **San Vicente Boulevard Medians and Carthay Circle**

The San Vicente Boulevard medians and Carthay Circle are set back from the Project Site and pedestrian access to the circle is through three street crossings at concrete medians. These medians are significant as a landscape constructed between 1955 and 1961 after the removal of the Los Angeles Railway street car tracks, and are a prominent visual landmark. These dividers separate the San Vicente Boulevard medians and Carthay Circle from the immediate setting of the Project Site and lessen the potential effect of the Project on the landscaped medians of San Vicente Boulevard and the one-story-scale setting of Carthay Circle. The City of Los Angeles has not adopted the medians as a HC M; however, the City adopted the Carthay Circle HPOZ, effective July 24, 1998 (Ordinance No.172,074). The main, character-defining viewsheds for Carthay Circle HPOZ are within and along the subdivision streets and would be retained. The setting of San Vicente Boulevard does not contribute to the eligibility of the medians, as their location and former use as a Pacific Electric Railway right-of-way primarily defines their historic significance. The Project would have a less-than-significant impact on the setting of these resources, which would remain eligible after Project completion.

### **560 South San Vicente Boulevard**

The multi-family residential building at 560 South San Vicente Boulevard is surrounded to the north by one-story buildings and to the south by two-story buildings. The direct view from this resource also includes the 8383 Wilshire Boulevard building that is at a similar height to the Project. The Project would be on the same side of the street, while 8383 Wilshire Boulevard is across the street. The building would have a distant view of the Project, which would be far enough away that the Project would have a less-than-significant impact on the setting of this resource.

### **Fox Wilshire-Saban Theater, Great Western Savings, and 8400 Wilshire Boulevard Buildings**

The Fox Wilshire-Saban Theater, Great Western Savings, and 8400 Wilshire Boulevard buildings are located on Wilshire Boulevard, west of the Project Site. The Fox Wilshire-Saban Theater is a Beverly Hills Landmark (No. 13) and is listed on the National Register of Historic Places. Each of these resources have views of a number of multi-story office buildings along Wilshire Boulevard. The Project would be far away enough that the setting of these resources would not be adversely affected and the Project would have a less-than-significant impact on the setting of these resources. Further, the 8383 Wilshire Boulevard building, which is one of the tallest buildings in the Project vicinity, would partially block the view of the Project from these historic resources. The part of the Project on the

corner of San Vicente Boulevard and South Sweetzer Avenue would be visible but indirect impacts would not be significant.

### **6th Street-Orange Street Multi-Family Residential Historic District**

The proposed 6th Street-Orange Street Multi-Family Residential Historic District, as identified in SurveyLA, is located north of the Project Site and would have indirect views of the Project.<sup>47</sup> The City of Los Angeles has not adopted the district as an historic district or HPOZ; however, three buildings within the district have been individually designated as an HCM, including 6400 West Orange Street (No. 1192), 6401 West Orange Street (No. 1193), and 6606 West Maryland Drive (No.923). With the 12-story height at the corner, the Project would be visible from this proposed district. However, a triangular lot located to the north of the Project Site, which is not part of the proposed district, is developed with two, two-story multi-family residences, and separates the Project Site and the boundary of the proposed district by approximately 70 feet. Therefore, the immediate setting of the proposed district with its two-story scale would be retained, and the distance between the Project Site and the proposed district lessens the impact of the Project on the proposed district. The main, character-defining viewsheds for the proposed 6th Street-Orange Street Multi-Family Residential Historic District are from within the proposed district and along the residential streets and would not be altered by the Project. Further, the Project would not impair the two-story visual massing of the proposed district as it is set back from the streets surrounding the proposed district. While the Project's scale would impact some views of the low-rise immediate setting, the proposed district would retain its eligibility upon Project completion and indirect impacts would not be significant.

### **(7) Archaeological Resources within the Project Site**

As detailed in the Cultural Resources Technical Report (Appendix D), a records search was conducted at the South Central Coastal Information Center (SCCIC), housed at California State University Fullerton on June 6, 2017. The records search covered the Project Site and a 0.5-mile radius around the Project Site. The records search indicated that seven (7) archaeological resource studies have been conducted within 0.5-mile radius of the Project Site, one of which covered the entirety of the Project Site. The records search also indicated that no archaeological resources have been recorded within the Project Site, or within the 0.50-mile search area. As the Project Site is fully developed and no natural ground surface exists, an archaeological resources survey was not conducted.

Although no known archaeological resources have been identified within or immediately adjacent to the Project Site, the development history of the Site indicates that resources could be present. The Project Site was initially developed with former commercial uses by the 1920s, as shown on a review of Sanborn

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<sup>47</sup> Historic Places LA, Los Angeles Historic Resources Inventory.

Maps. These uses included a one-story office building, a “Frozen Food Lockers” building, an unnamed store, and a furniture store. Some of these improvements would later be demolished for the construction of the current Big 5 Sporting Goods store in 1977, while others were combined in 2003 to form the Montessori Children’s World School, which is currently vacant. Since the current and former buildings do not have basements, there is potential that remnants of the former historic period and prehistoric period uses have been preserved below the foundations of the current buildings and below the surface parking lot within the Project Site, as these areas would not have been subjected to deep excavations that would have displaced or destroyed resources.

Additionally, the Project Site is located in the immediate vicinity of several historical-period thoroughfares and transportation corridors, including the Pacific Electric Railway right-of-way, Wilshire Boulevard, and activity associated with the La Brea Tar Pits. In particular, the route of Wilshire Boulevard, located immediately south of the Project Site, is known to have been used during prehistoric times by the Gabrielino to reach the La Brea Tar Pits located approximately 0.50 mile east of the Project Site. In addition, former tributary that once crossed the Project Site, as seen on historic topographic maps, likely attracted prehistoric and historic period inhabitants to the area. The alluvial deposition associated with the tributary has the potential for burying and preserving archaeological sites. Given this, there is potential for archaeological resources to be preserved under the current foundations for the buildings and the surface parking lots, and the Project Site is considered to have a moderate sensitivity for buried archaeological resources.

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a Project would have a significant impact related to cultural resources if it would:

***Threshold (a): Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;***

***Threshold (b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or***

***Threshold (c): Disturb any human remains including those interred outside of formal cemeteries***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The 2006 L.A. CEQA Thresholds Guide Identifies the following factors to evaluate impacts to cultural resources:

### (1) Historic Resources

- A project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 when one or more of the following occurs:
  - Demolition of a significant resource.
  - Relocation that does not maintain the integrity and significance of a significant resource.
  - Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Standards.
  - Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

### (2) Archaeological Resources

- If the project would disturb, damage, or degrade an archaeological resource of its setting that is found to be important under the criteria of CEQA because it:
  - Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory.
  - Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions.
  - Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind.
  - Is at least 100 years old and possesses substantial stratigraphic integrity.
  - Involves important research questions that historical research has shown can be answered only with archaeological methods.

## **b) Methodology**

A project with an effect 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. In general, a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1)). In addition, while assessing the project’s impacts under CEQA, it is important to

consider the ability of the historical resources to retain their integrity. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment. This analysis of impacts to historical resources is based on the detailed technical information provided in the ESA reports provided in Appendices C and D, of this Draft EIR. Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or may otherwise impact any historic resource(s), and, if so, (2) a determination of whether the Project would result in a “substantial adverse change” in the significance of the identified resource or resources.<sup>48</sup>

### (1) Historical Architectural Resources

A Historic Resources Assessment, included in Appendix C, was prepared by qualified personnel who meet and exceed the Secretary of the Interior’s Professional Qualification Standards in history and architectural history. The key steps taken in completing the Historic Resources Assessment include a review of the existing properties within the Project Site and within 0.25 miles of the Project Site in order to address indirect impacts. Research of the Project Site’s development included a review of historic building permits for improvements to the property, Sanborn Fire Insurance maps, historic photographs, aerial photos, and local histories. The California State Historic Resources Inventory (HRI) for Los Angeles County, Department of Parks and Recreation Historic Resources Inventory Forms, and SurveyLA Eligibility findings were consulted to identify any previous evaluations of Project Site and potential historic resources within 0.25 miles of the Project Site. The Community Redevelopment Agency (CRA) Historic Resources Survey: Hollywood Redevelopment Project Area, published in 2010 was also reviewed. In addition, field examinations were conducted to review and confirm previous findings and to identify previously unevaluated properties that were potentially eligible as historical resources within the area where potential direct or indirect impacts could occur. The potential for indirect impacts was assessed during the site visit, and by reviewing historical resources documented within 0.25 miles of the Project Site.

### (2) Archaeological Resources

The analysis of impacts to archaeological resources is also based on the Cultural Resources Assessment, which included: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a 0.5-mile radius of Project Site, as well as a review of cultural resource reports and historic topographic maps on file, (2) a review of the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State HRI listings, (3) an SLF search commissioned through the NAHC, (4) geoarchaeological review (5) a review of

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<sup>48</sup> Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5.

available Sanborn Maps, historic aerial imagery; and other technical studies, and (5) a pedestrian survey of the Project Site.

The potential for the Project Site to contain buried archaeological resources is assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources) and SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

### **c) Project Design Features**

No specific project design features are proposed with regard to cultural resources.

### **d) Analysis of Project Impacts**

***Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?***

#### **(1) Impact Analysis**

##### *(i) Direct Impact Analysis*

Direct impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of potential historical resources, if any, within the Project Site. The Project Site is currently developed with a 5,738-square-foot vacant building located at 650-658 South San Vicente Boulevard (Building 1) and an 8,225-square-foot Big 5 Sporting Goods store located at 6601 Wilshire Boulevard (Building 2). Building 2 was constructed in 1977 and does not meet the 45-year age threshold for evaluation as a historical resource as defined by the Office of Historic Preservation (OHP).<sup>49</sup>

Building 1 was originally two separate buildings built in 1945 and in 1951 (hereafter referenced as Building 1-A and Building 1-B, respectively); both buildings exceed the 45-year age threshold. By 2003, the two buildings were combined into one building, known as 650 South San Vicente Boulevard (the Montessori Children's World School). Based on a review of review of the National Register, the California Register, the California Historical Resources Information System (CHRIS), and the City of Los Angeles's inventory of historic properties (SurveyLA) Building 1 is not considered a historical resource pursuant to CEQA. Furthermore, Building 1 does not qualify as a contributor to a potential historic district. In addition, the Project Site is not situated in a designated or previously evaluated historic district.

<sup>49</sup> Office of Historic Preservation, Instructions for Recording Historical Resources, March 1995.

(ii) *Indirect Impact Analysis*

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of nearby historical resources. As discussed above in **Subsection IV.B.2(6), *Historical Resources within the Project Vicinity***, on page IV.B-17 through IV.B-22, indirect impacts to 11 nearby historical resources within a 0.25-mile radius of the Project Site were also analyzed. As summarized above in Table IV.B-1 on page IV.B-20, nine of the 11 historical resources would have a direct view of the Project Site, one would have an indirect view, and one would have no view.

While the Project's scale would alter the low-rise setting of the Project Site, contemporary multi-story and high-rise, non-historic built resources have already been introduced into the Project vicinity along Wilshire Boulevard. Some examples include, but are not limited to, 6400 Wilshire (mid-rise) to the west, 6500 Wilshire (high-rise) to the east, 8200 Wilshire (mid-rise) across Wilshire to the east, 8833 Wilshire (high-rise) across Wilshire to the west. Furthermore, Wilshire Boulevard is characterized by a variety of buildings ranging in scale from low-rise commercial storefronts to large high-rise mixed-use residential and office buildings. The closest historic resource is a two-story American Colonial Revival building across South Sweetzer Avenue to the east of the Project Site at 6535 West Wilshire Boulevard. The setting of 6535 West Wilshire Boulevard has been altered by a billboard at an approximately five-story height that rises from the courtyard of the building, and the surrounding setting has already been altered by a 12-story building, the Jewish Federation Goldsmith Center, at 6505 Wilshire Boulevard. The setting of 6535 West Wilshire Boulevard does not contribute to the eligibility of the resource and is not an essential integrity consideration for the building. Thus, 6536 West Wilshire Boulevard would still retain its eligibility and would still be visible within the streetscape and urban context; therefore, indirect impacts would not be significant. Furthermore, the Project Site does not contribute to the eligibility of any of the other resources identified in the Project vicinity, including San Vicente Boulevard medians and the Carthay Circle HPOZ, 560 South San Vicente Boulevard, Fox Wilshire-Saban Theater, Great Western Savings, and 8400 Wilshire Boulevard, and the 6th Street-Orange Street Multi-Family Residential District. These resources are more than 0.25 miles away from the Project and would therefore not be adversely affected with regard to visibility and integrity. As such, the Project would have a less-than-significant impact on the setting of these resources. As discussed above, 6535 West Wilshire Boulevard would retain its eligibility and still be visible within the streetscape and urban context. The character-defining scale, setback, and massing of 8383 Wilshire Boulevard, and main character-defining viewsheds of the resource from the west along San Vicente and Wilshire Boulevards would be retained, maintaining its eligibility as a historic resource. Similarly, the primary character-defining viewsheds for the Carthay Circle HPOZ are within and along the subdivision streets and would be retained. The setting of San Vicente Boulevard does not contribute to the eligibility of the medians, as their

location and former use as a Pacific Electric Railway right-of-way primarily defines their historic significance. Therefore, the Project would have a less-than-significant impact on the setting of these resources, which would remain eligible after Project completion. The multi-family residential building at 560 South San Vicente Boulevard is surrounded by intervening development and would have a distant view of the Project, which would be far enough away that the Project would have a less-than-significant impact on the setting of this resource. The Fox Wilshire-Saban Theater, Great Western Savings, and 8400 Wilshire Boulevard buildings are located on Wilshire Boulevard, west of the Project Site, and have views of a number of multi-story office buildings along Wilshire Boulevard. The Project would be far away enough that the setting of these resources would not be adversely affected and the Project would have a less-than-significant impact on the setting of these resources. Further, the 8383 Wilshire Boulevard building, which is one of the tallest buildings in the Project vicinity, would partially block the view of the Project from these historic resources. The proposed 6th Street-Orange Street Multi-Family Residential Historic District, is located north of the Project Site, but is separated from it by a triangular lot that is not part of the proposed district and is developed with two, two-story multi-family residences. The immediate setting of the proposed district with its two-story scale would be retained, and the 70-foot distance between the Project Site and the proposed district lessens the impact of the Project on the proposed district. The main, character-defining viewsheds for the proposed 6th Street-Orange Street Multi-Family Residential Historic District are from within the proposed district and along the residential streets and would not be altered by the Project, and the Project would not impair the two-story visual massing of the proposed district as it is set back from the streets surrounding the proposed district. Therefore, the proposed district would retain its eligibility and indirect impacts from the Project would not be significant.

Even though construction of the Project would alter the low-rise setting of the Project Site, the Project setting has already been substantially altered by large-scale infill construction and redevelopment. The Project is situated at enough of a distance from the historical resources, as discussed above, so as not to cause any material impairment or substantial visual impact. After Project completion, historical resources in the Project vicinity would retain their existing eligibility and visibility within the urban environment.

**As there would be no direct or indirect impacts on historical resources, the Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Therefore, impacts would be less than significant.**

## (2) Mitigation Measures

Impacts regarding historical resources would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Impacts regarding historical resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

**Threshold (b): *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***

#### (1) Impact Analysis

CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

As discussed previously a records search at the SCCIC indicates that no archaeological resources occur within or within 0.5-mile of the Project Site. However, while no known resources have been identified within or immediately adjacent to the Project Site, this does not preclude the possibility that subsurface archaeological deposits underlie the Project Site. The history of development of the Project Site indicates that subsurface archaeological materials related to early development may remain beneath the existing buildings and parking lot. Moreover, the Project Site is located in the immediate vicinity of several historical-period thoroughfares and transportation corridors, both during the historic and prehistoric periods. Additionally, a former tributary that once crossed the Project Site likely attracted prehistoric and historic period inhabitants to the area. The alluvial deposition associated with the tributary has the potential for burying and preserving archaeological sites.

The Project Site contains compacted fill that is two feet deep under the Big 5 Sporting Goods store while fill was not encountered during borings that were located within the surface parking areas. Natural alluvial sediments underlie the Project Site and extend from the surface to approximately 30 feet in depth.<sup>50</sup> Given the potential for archaeological resources to be preserved under the current foundations for the buildings and the surface parking lots, the Project Site is considered to have a moderate sensitivity for buried archaeological resources. Project construction would require grading and excavation activities for building foundations that could have the potential to disturb existing or undiscovered

<sup>50</sup> Byer Geotechnical, Inc., Geologic and Soils Engineering Exploration, July 25, 2019, updated January 14, 2020, page 7. Provided in Appendix F of this Draft EIR.

archaeological resources. Disturbance or destruction of these resources could constitute a significant impact.

**Therefore, the Project has the potential to cause a substantial adverse change in the significance of an archaeological resource that qualifies as a historical resource or unique archaeological resource pursuant to CEQA Guidelines Section 15064.5, which may result in potentially significant impacts to archaeological resources.**

## (2) Mitigation Measures

The following mitigation measures would reduce potentially significant impacts on archaeological resources:

- **CUL-MM-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Archaeologist. At a minimum, the need for monitoring will be reassessed at depths of excavation greater than five feet below surface. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, to be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed if such resources are encountered.
- **CUL-MM-2:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to PRC Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources.

The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.

- **CUL-MM-3:** Prior to the release of the grading bond, the qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms for each resource at the conclusion of archaeological monitoring.<sup>51</sup> The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

### (3) Level of Significance After Mitigation

Implementation of Mitigation Measures CUL-MM-1 through CUL-MM-3, which require archaeological monitoring, treatment of unanticipated discoveries, and reporting, would ensure that potentially significant impacts to archaeological resources are reduced to a less-than-significant level.

***Threshold (c): Would the Project disturb any human remains including those interred outside of formal cemeteries?***

As discussed in **Chapter VI, Other CEQA Considerations**, and in the Initial Study (Appendix A) of this Draft EIR, while the uncovering of human remains is not anticipated, if human remains are inadvertently discovered during construction or the course of any ground disturbance activities, the Project would adhere to standard conditions of approval required by the City. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. **Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains**

<sup>51</sup> A grading bond ensures the permit applicant is in compliance with the LAMC's rules and regulations.

unexpectedly encountered during grading and excavation activities. Therefore, impacts would be less than significant. As such, no further analysis is required.

## e) Cumulative Impacts

### (1) Impact Analysis

#### (a) *Historical Architectural Resources*

A significant cumulative impact associated with the Project and related projects would occur if the impact would render a historical resource or district as no longer eligible for listing, and the Project's contribution to the impact would be cumulatively considerable. Related projects that have the potential to result in combined or cumulative impacts in association with the impacts of the Project are identified in **Chapter III, *Environmental Setting***, which includes **Table III-1, *Related Projects List***, and **Figure III-1, *Related Projects Map***, which shows the locations of each of the related projects listed in Table III-1. In assessing cumulative impacts on historical resources, the focus is on related projects that are located in the immediate vicinity of the Project that have the potential to contribute to changes in the setting of identified historical resources on the Project Site and in the vicinity, including historic districts. Four projects have been identified within the 0.25-mile radius of the Project Site, including a hotel development (55 North La Cienega Boulevard Project), two mixed residential and retail developments (6401-6419 Wilshire Boulevard and 488 South San Vicente Boulevard Projects), and the Metro Purple Line Extension.

As discussed above, no historic resources were identified within the Project Site and the Project would not have a direct or indirect impact on historical resources within the Project vicinity. While the related projects in the study area for cumulative impacts have the potential to impact historical and archaeological resources, each will require mitigation under CEQA to reduce the level of those impacts should one occur. The Project itself would have less-than-significant impacts on cultural resources as discussed herein.

**Therefore, the Project's contribution to impacts related to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.**

#### (b) *Archaeological Resources*

Impacts related to archaeological resources qualifying as historical resources or unique archaeological resources under CEQA are in most cases site-specific because they occur on a project level as a result of a project's ground disturbance activities during construction and, as such, are assessed on a project-by-project basis. Many of the related projects within the cumulative study area would require excavation that could potentially expose or damage archaeological resources

potentially qualifying as historical resources. However, the related projects are also located in highly developed urban areas with sites that have been previously disturbed and are not adjacent to the Project Site. The potential of such projects to encounter and cause, in conjunction with the Project, a significant cumulative impact on archaeological resources is low. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures including avoidance and preservation in place or other treatment would be required for related projects that have the potential to cause significant impacts to undiscovered (subsurface) archaeological resources qualifying as historical resources under CEQA. As with the Project, such measures, if implemented, would reduce project level significant impacts to a less-than-significant level.

Similarly, the related projects would be required to comply with applicable regulations and standard City mitigation measures regarding discovery of archaeological resources. **As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts to cultural resources would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Cumulative impacts to cultural resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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