

# IV. Environmental Impact Analysis

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## B. Cultural Resources

### 1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Project. Historic Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. The analysis of potential impacts to historic resources is based, in part, on the *Cultural Resources Technical Appendix—Lankershim Depot, 11275 Chandler Blvd, 11333–11345 Chandler Blvd, North Hollywood, CA* (Historic Report) prepared by Jenna Snow (December 2020), included as Appendix D of this Draft EIR. The analysis of potential impacts to archaeological resources is based on the *Cultural Resources Survey and Extended Phase I Report for the District NoHo Project, City of Los Angeles, California* (Archaeological Report) prepared by Dudek (November 11, 2021), which is included as Appendix E 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 of 1966, as amended;
- The Secretary of the Interior’s Standards for the Treatment of Historic Properties (Secretary’s Standards);
- The Native American Graves Protection and Repatriation Act;

- The Archaeological Resources Protection Act;
- The Archaeological Data Preservation Act;
- The California Environmental Quality Act;
- The California Register of Historical Resources;
- The California Health and Safety Code;
- The California Public Resources Code;
- The City of Los Angeles General Plan;
- The City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171);
- The City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code, Section 12.20.3); and
- The City of Los Angeles Historic Resources Survey (SurveyLA).

### (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>

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<sup>1</sup> 36 CFR 60.

<sup>2</sup> *United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Questions*, [www.nps.gov/subjects/nationalhistoricalandmarks/faqs.htm](http://www.nps.gov/subjects/nationalhistoricalandmarks/faqs.htm), accessed February 22, 2021.

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;
- 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.

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

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

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*(i) Criteria*

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 CFR, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- 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>

*(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, which is defined as “the ability of a property to convey its significance.”<sup>7</sup> The

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

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

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

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 Considerations 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 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

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

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

- 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) Secretary of the Interior's Standards*

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.
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.

*(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>

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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.*

*(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 in 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 CEQA 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.

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 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,

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<sup>11</sup> *United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, [www.nps.gov/archeology/tools/laws/nagpra.htm](http://www.nps.gov/archeology/tools/laws/nagpra.htm), accessed February 22, 2021.*

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

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>

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

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<sup>13</sup> PRC Section 21083.1(a).

<sup>14</sup> State CEQA Statute and Guidelines, Section 15064.5(c)(4).

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

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) Code, 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 impacts that are less than significant.<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 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 significant at the local, State, and/or federal level under one or more of the following four criteria:

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

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

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

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 State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources 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;
- Historic 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 Sections 7050.5, 7051, and 7054 address the illegality of 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*

California 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 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 land owner 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*

*(i) Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, 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 additional 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)

*(ii) Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project Site is located within the planning boundary of the North Hollywood Valley Village Community Plan (Community Plan), last updated in 1996. The City began updating the Community Plan in July 2018. In the meantime, the existing Community Plan remains in effect. The Community Plan does not specifically address historic resources; however, the need to preserve and rehabilitate historic areas, as well as promoting new development that complements significant historic structures were identified.

*(b) City of Los Angeles Cultural Heritage Ordinance*

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 citizens, appointed by the Mayor, who have exhibited

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

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 criteria for HCM designation are stated below:

- The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community; or
- The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
- The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.<sup>20</sup>

Is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community; 1. Is associated with the lives of historic personages important to national, state, city, or local history; or 2. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

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:

- 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?

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

- 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, Los Angeles Municipal Code (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 LAMC Section 19.05. 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>

*(c) City of Los Angeles Historic Preservation Overlay Zone (HPOZ)  
Ordinance*

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

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

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

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)*

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 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 the Community Redevelopment Agency of the City of Los Angeles. 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

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

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**

### **(1) Historic Resources**

#### *(a) Historic Context*

The Project Site and Off-Site Metro Parking Areas are generally located at or near the intersection of Lankershim and Chandler Boulevards, the historic center of North Hollywood. Historic maps and photos included in Appendix D of this Draft EIR show development gradually radiating out from this intersection over time. Historic photos from the turn of the twentieth century show the Lankershim Depot with trees in the background. The earliest Sanborn fire insurance maps from 1912 identify the Lankershim Depot at the northwest corner of the intersection, south of Southern Pacific Railroad tracks and the Blanchard Lumber Co. at the northeast corner of the intersection, north of the tracks. Immediately west of the Blanchard Lumber Co., also north of the tracks and partially within the Project Site, was Bonner Fruit Company Cannery. A few commercial buildings were located immediately south of Chandler Boulevard on both sides of Lankershim Boulevard. Small residences were built on the south side of Chandler Boulevard, extending east of Lankershim Boulevard.

By the 1920s, additional commercial development had pushed further south on Lankershim Boulevard and continued to expand throughout the decade. Commercial

buildings were one and two stories high and constructed at the sidewalk line. Notable buildings included the California Bank building at the southwest corner of Lankershim and Chandler Boulevards (5337 Lankershim, constructed prior to 1919, significantly altered in 1927 by Morgan Walls & Clement, demolished 1988), the Security Trust and Savings Bank building (5301 Lankershim Boulevard, 1923/1930, extant), and the El Portal Theater (5165-5271 Lankershim Boulevard, 1926/1950, extant).

Historic photos also show a small plaza at the northwest corner of Lankershim and Chandler Boulevards. The earliest appearance of the plaza is in the 1919 Sanborn map, which shows it as a dotted lined with the label “Park.” By 1944, a historic aerial photograph shows the plaza no longer exists; the area appears as a surface parking lot. A historic photograph from 1961 shows the northwest corner of Lankershim and Chandler Boulevards as a Chevron gas station.

North Hollywood continued to expand in the post-World War II period. While the Pacific Electric Red Car passenger line ceased operation in 1952, the rail line continued to function for freight through the early 1990s. Significant changes to the commercial area around Lankershim and Chandler Boulevards did not occur until after the Northridge earthquake in 1994, which resulted in a loss of many historic buildings along Lankershim. In the past 20 years, the area has changed with arrival of the Los Angeles County Metropolitan Transportation Authority (Metro) North Hollywood Station and terminus of the Metro G (Orange) Line Busway Station, and construction of numerous multi-family residential buildings surrounding the Project Site.

*(b) Project Site*

The Project Site is located in an urban environment with wide sidewalks, some lined with trees that are planted in narrow wells along the street edge, surrounded mostly by contemporary development consisting of multi-family residential and commercial ranging from two to fourteen stories in height. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with surface parking, industrial/warehouse buildings totaling 25,145 square feet,<sup>24</sup> and Metro facilities including the G (Orange) Line terminus, B (Red) Line North Hollywood station, and a local bus plaza. Within the Project Site, there are two properties with buildings over 45 years in age, all located west of Lankershim Boulevard: the Lankershim Depot and 11333–11345 Chandler Boulevard. Each of these are discussed in detail below.

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<sup>24</sup> On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

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(i) *Lankershim Depot*

(1) Exterior

The Lankershim Train Depot is a long, horizontal structure, one story high and orientated parallel with Chandler Boulevard South to the south and the G (Orange) Line terminus to the north. The building is located on a slightly raised platform with landscaping planted between the building and sidewalk to the south. Contemporary ramps provide pedestrian access along the eastern side of the building, both at the south and north elevations. Contemporary metal railings line the perimeter of the platform. Additional stairs are located toward the center of the south elevation. The building has a side gable roof with widely overhanging eaves, a simple fascia, and decorative angled braces. A sign along the ridgeline reads “Southern Pacific–Pacific Electric Station.” A brick chimney rises from the roof towards the east elevation. The eastern portion of the structure is enclosed while the west portion has open sides defined by wood piers around the perimeter. Fenestration consists of multi-light, double hung wood sash. Wood doors are topped by multi-light transoms.

(2) Interior

The building currently functions as a coffee shop with two main public spaces within the interior: a lower level and an upper level connected by a stair along the south elevation. Both are finished with wood walls, floors, and ceilings. Finishes of the lower level are more refined with channel wood walls and ceiling, while upper level finishes consist of plywood walls and exposed roof structure. Private, back-of-house spaces, including a small kitchen, office, and storeroom are located toward the east elevation.

(3) Alterations

Beginning around 2007, the building underwent a rehabilitation project that took over seven years to complete. Prior to the rehabilitation, the building had undergone few alterations, which included a new concrete slab covering the wood platform, interior partitions, concrete and wood stairs, new fencing, and new signage. Work completed under the recent rehabilitation restored the building to its 1911–1952 appearance and adaptively reused it as a coffee shop/café. Specifically, work included:

- Restoration of building shell and exterior
- Seismic retrofit: replacement and/or strengthening of the foundation and installation of seismic beams, cantilevered posts, plywood diaphragm on roof, and interior shear walls.
- Compliance with Americans with Disabilities Act (ADA) requirements

- Removal of later additions, including concrete slab covering wood platform, concrete/wooden stairs, interior partitions
- Tenant improvements
- Construction of two restrooms
- All new systems, including electrical, lighting, plumbing, and mechanical
- Site work including landscaping the corner plaza

#### (4) Building History

The following background was included in a Department of Parks and Recreation form prepared by Roger Hathaway in 1982:<sup>25</sup>

*Hendrick's Builders Supply (Southern Pacific Depot) is significant for its association with the growth and settlement of North Hollywood, and for its relatively unaltered condition. Southern Pacific built the first line through Toluca (North Hollywood) in 1896, and the station appears to have been built at this time. The Southern Pacific played a highly significant role in the development of agriculture and livestock which were extremely important to the early growth of North Hollywood.*

In December of 1911, the Pacific Electric Company opened its line through North Hollywood, and the station was incorporated into a dual service line between the Southern Pacific and the Pacific Electric. The Southern Pacific station is one of the few remaining wood frame nineteenth century railroad stations in southern California. A photograph from 1927 indicates that the station was known as the "Southern Pacific–Pacific Electric" station.

Additional background was supplied by the Historical Lankershim Train Depot Restoration Project in an undated document:<sup>26</sup>

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<sup>25</sup> Hathaway, Roger, "Hendrick's Builders Supply Co./Lankershim (Toluca) Southern Pacific Railroad Depot," State of California, Department of Parks and Recreation, Historic Resources Inventory Form, June 1982.

<sup>26</sup> Historic Lankershim Train Depot Restoration Project, "Original Historic Lankershim Train Depot," unpublished, undated document. The board of directors included President Guy Weddington McCreary, John Vivian, Diane McCreary. In the September 2000 publication of Community Connection by the Universal City–North Hollywood Chamber of Commerce, John Vivian wrote, "The importance of the 1895 Southern Pacific Station can not be over emphasized."

*...the railway opened up this part of the San Fernando Valley, and the rail station was a catalyst for the development of, and brought growth and prosperity to, what is now North Hollywood. Hundreds of thousands of tons of fruit were shipped to the Lankershim Depot where Bonner Fruit and Cannery Co. processed and canned the food for wide-spread distribution. The Southern Pacific also included passenger service; Pacific Electric 'Red Car' passenger Services serve the Lankershim Depot from 1911 to 1952.*

Once the Pacific Electric stopped running in 1952, the Depot was leased to a building supply and lumberyard. The property was purchased by Metro in 1991 to facilitate construction of Metro B (Red) Line.

#### (5) Summary of Significance

The Lankershim Depot was officially determined eligible for listing in the National Register in 1983 and was automatically listed in the California Register. It was found significant for "its association with the early growth and subsequent settlement of the North Hollywood area. Additionally, it is one of the only surviving non-adobe structures constructed during the 19th century in the Valley." As the Depot is listed in the California Register, it is considered a historical resource for purposes of CEQA. The period of significance dates from 1911 through 1952, when the Pacific Electric served the Depot. Character-defining features, or those physical features that convey the Depot's significance, have been identified to include the platform, doors/windows, chimney, rooftop signs, canopy, telephone booth, exterior walls, landscaping, and the interior floor plan.

#### *(ii) 11333–11345 Chandler Boulevard*

##### (1) Building 1: 11333 Chandler Boulevard

Located along the north property line, Building 1 is a simple, one-story industrial building with no architectural style and no decorative features. It has a rectangular plan and a side gable roof, composed of corrugated metal, with slightly overhanging eaves. Exterior walls are finished in corrugated metal and the building has no windows.

The primary elevation faces south and contains two, metal roll-up doors at either side of the elevation. Two, small, woodsheds protrude from the south elevation. The small woodshed at the east side of the elevation contains restrooms, while the other, offset west of center, serves as storage. A single, contemporary, metal door is located toward the west side of the elevation. The east and north elevations have no articulation, including no openings. The west elevation directly abuts Building 3, which is discussed further below.

Building 1 currently functions as storage. The interior is divided into two, unequally sized spaces. Both spaces have exposed, regularly spaced, metal trusses. Insulation is also visible along the roof, while skylights provide some illumination to the interior. Additional illumination is provided by suspended, contemporary florescent tube lights. Walls are finished in unpainted drywall. The floor of the west space has unfinished concrete, while the floor of the east space is composed of unfinished plywood boards.

### (2) Building 2: 11333 Chandler Boulevard

Building 2 is a small, one-story building at the east property line with a rectangular plan and no architectural style. It has a steep, shed roof with boxed eaves at the low, west elevation and high, east elevation. The building is finished in wood siding.

A single, contemporary door, protected by a metal screen, is located off-center at the west elevation. A horizontally sliding aluminum window is located immediately adjacent to the door. The window is also protected by contemporary metal security bars. There is no other articulation on the west elevation. Neither the south nor east elevations have any articulation. The north elevation contains a large, fixed sash window, also protected by metal security bars, and an additional contemporary door.

Building 2 is used for storage and an office. The office is located at the north side of the building, while the storage is located at the south. All finishes are contemporary.

### (3) Building 3: 11341 Chandler Boulevard

Building 3 is a one-story industrial building with no architectural style or decorative features. A bowstring truss roof is evident above the parapet. Fenestration is limited to the primary, south elevation and the south side of the east elevation.

The south, primary façade is set back from the street by a driveway that slopes down. A loading dock fronts the south elevation and the main entrance is placed above the loading dock. A walkway along the west side of the driveway provides pedestrian access from the street while a short flight of concrete steps edged by a simple metal rail leads to the loading dock along the east side of the driveway. Large, metal doors hang from a track that spans above a wide opening, a pedestrian door, and a large, fixed window. At the time of the site visit, the doors were set in a fully open position at either side of the track. The façade is finished in smooth stucco. Signage is painted within the parapet. The south side of the east elevation is also finished in smooth stucco and has fenestration on the first and second floors. On the first floor, fenestration consists of three windows, one fixed sash window and two aluminum sliding sash windows. On the second floor, fenestration consists of wood, double hung sash. The majority of the east elevation is finished in corrugated metal and has no fenestration. The north side of the east elevation directly

abuts Building 1. The north elevation, facing the alley, is finished in smooth stucco. It has a large truck door, roughly centered in the elevation. Although open at the time of the site visit, the truck door has a roll-up metal door, which was partly visible. The west elevation shares a wall with Building 4 (discussed further below) and is not visible except for a short segment at the north side of the elevation.

The interior is dominated by a single large space. A small office is located in the southeast corner of the building. The office has a finished ceiling and features contemporary materials, including contemporary wood siding, linoleum floors, and florescent light fixtures. The main interior space exhibits unfinished materials. Visible, metal bowstring trusses span the main interior space. Florescent tube lights hang from the ceiling and plywood roof sheathing is also visible. The floor is finished in concrete while walls are finished in corrugated metal. A mezzanine, which runs along the east elevation, is reached via a wood stair with no risers, only treads. An enclosed space above the small office, with a door from the mezzanine, was not accessible during the site visit.

#### (4) Building 4: 11345 Chandler Boulevard

Building 4 is an industrial/commercial building with no architectural style. The building is constructed close to the property line along both the south and west elevations. Building 4 is two stories high at the primary, south elevation, and steps down to a high-volume single-story along the north three-quarters of the building. The two-story portion has a flat roof with a parapet, while the one-story portion has a bowstring truss roof. Three skylights are visible from the north portion of the roof. The building is finished in smooth stucco. Fenestration is limited to the south, two-story portion and consists of aluminum, horizontal sliding sash windows. First floor windows are covered with contemporary metal security bars.

The south façade is organized as three bays at the first floor and four bays at the second floor. The east bay along the first floor is obscured by overgrown vines attached to the building. The primary entrance is centered on the elevation and is reached via a single concrete step. Glass block sidelights edge both sides of the entrance, although the glass blocks on the west side are obscured by overgrown vines. Three windows are located in each outer bay at the first floor and bays on the second floor are each defined by a single window. Only a limited portion at the south side of the east elevation is visible due to Building 3 directly adjacent. Along the east elevation, four windows are located on the first floor while two are located on the second floor. All windows on the east elevation are covered by metal awnings. Painted signage above the second-floor windows advertises "Plumbing Supplies." A single door is located adjacent to Building 3. The rear, north elevation exhibits a variety of siding, including corrugated metal over wood siding. A large truck door is located in the east side of the elevation and a single pedestrian door is located toward the center of the elevation. The west elevation is generally not articulated except

for fenestration at the south side of the elevation. Fenestration on the west elevation follows the pattern from the east elevation, with four windows on the first floor and two on the second floor.

Building 4 is currently vacant and in a state of disrepair with a severely deteriorated roof allowing for water infiltration. On the interior, the southern portion of the building appears to have been used for office on the first floor and, most recently, for residential on the second floor. In the office space, doors and windows have simple wood surrounds. Floors are finished with carpet and some ceilings feature square tile. In the northern portion of the building, bowstring trusses are visible. Shallow mezzanines line the east and west elevations with two bridges spanning the space. Floors are finished in carpet while plywood roof sheathing is visible. Several flights of stairs provide access to the second floor and mezzanines. The interior face of the exterior walls are unfinished and wood framing and corrugated metal siding are visible.

#### (5) Alterations

The four buildings within 11333–11345 Chandler Boulevard described above were constructed between 1945 and 1994. Specifically, Building 1 was constructed between 1949 and 1954; Building 2 was constructed around 1994 (no original permit was available); Building 3 was constructed in 1955; and Building 4 was constructed in 1945. While the property has evolved over the years with construction and removal of buildings, as described below, the buildings continue to generally appear much as they did when they were constructed.

Chandler Boulevard was originally known as Blakeslee Avenue until the mid-1920s, when the name changed. In the early twentieth century, the parcel was subdivided into four to five smaller parcels. There were no buildings on the property until about 1922, when an electrical power structure was constructed for a planned concrete pipe manufacturing building. It does not appear the concrete pipe manufacturing building was ever built. Development on the property began in 1928, when four building permits were issued to construct buildings and structures for the Alley Brothers Lumber Company, including a lumber shed, a lumber storage building, and two other structures. A feed, hay, and grain warehouse along the east side of the property (not extant) was constructed about 1927. Historic building permits sometimes included the eastern portion of the property (where the feed, hay, and grain building was located) in associated plot plans and sometimes did not. In 1936, the Southern Pacific Railroad made alterations to an existing shed building on the property, to be used as a temporary office. The parcels were subsequently merged to create the existing larger parcel. Most of the early (1920s) buildings were demolished prior to development with the existing buildings beginning in 1945.

In 1945, a permit was issued for construction of Building 4, originally designed as a one- and two-story supply warehouse for the Edwards Plumbing and Supply Company. In 1948, permits were issued for interior alterations to add a mezzanine, to add ceiling joists, and make other modifications to the ceiling of a second floor office space.

In 1955, a permit was issued for construction of Building 3 as a one-story building addition to Building 4. The same permit shows the removal of the existing buildings to the feed, hay, and grain warehouse.

Building 1 appears to have been constructed as a combination of additions made to the east of Building 3, though early building permits and plot plans are unclear about precise dates of construction for this building. For example, in 1949, a permit was issued for a one-story addition extending east of the warehouse, with corrugated aluminum exterior walls. In 1951, a permit was issued for another one-story side addition, also extending east of the warehouse, south of the prior addition. In 1951, a permit was issued to add a storage building and to relocate an existing building. In 1954, a permit was issued to add a side addition to the warehouse with a mezzanine. Also, in 1951, a permit was issued to erect a new one-story office and storage building with wood frame construction and stucco cladding (not extant).

There is no original permit available documenting construction of Building 2, but historic aerials show the building was constructed by 1994. It should be noted that in 1969, the Edwards Plumbing Supply Company also developed another one-story warehouse to the east of the existing buildings, but that building was demolished around 2007.

### (6) History

Historic map book records of the Los Angeles County Assessor show the property was historically owned by Southern Pacific Railroad Company, from 1905 through 1991.

The existing buildings were originally occupied by plumbing supply companies. The earliest known tenant was the Edwards Plumbing and Supply Company, a tenant from 1945 until at least 1969, as shown on building permits. Edwards Plumbing Supply Company sold wholesale plumbing supplies. There is little available information about the history of the business. Historic newspaper databases indicate the company did not take out display advertisements, though it is mentioned a few times in advertisements for fixtures it supplied and is sometimes referred to as “Edwards Supply Co.” Early city directory listings provided that Charles K. Bereny (c. 1899–1980) was the main contact person in the mid-1940s. Bereny was born in Ohio and lived nearby the property at 4531 Lankershim Boulevard in 1946. By 1960, he was the president of the company. He retired that year to Palm Springs. The company appears to have had another location in Azusa in 1960. Edwards Plumbing Supply Company remained at the property until at least

1969, when the last available building permit showing it as owner is available. The current tenant of Building 3, Mark Gerson Plumbing Supply, Inc. appears to have occupied the building beginning around 1985, when the business registered with the California Secretary of State.

Historic newspapers include some information about later tenants. In the 1970s through the early 2000s, there were a few different tenants occupying Building 4. In 1979, a classified advertisement was published seeking people to deliver telephone directories, inviting applicants to visit one of several locations, including at 11345 Chandler Boulevard (name of directory company not given). In 1983, a clothing company known as VSOP (Velvet & Satin on People), which offered custom designed clothing, was located at 11345 Chandler Boulevard. In 1989, a classified advertisement was published for an available shop and office space at 11345 Chandler Boulevard. In the mid-1990s, a theater known as Haunted Studios occupied 11345 Chandler Boulevard. There are only a few available articles about work produced at the theater. In 1995, the Fabulous Monsters Performance Company produced “The Tiny Hamlet Show,” an abbreviated adaptation of Hamlet, in the building. In 1996, a performance of a musical satire, “Who Killed Mrs. Bitzer?” was also produced in the building. While there are few available historical newspaper references to Haunted Studios over the years, Google Street imagery shows the theater occupying the building until 2007.

#### *(c) Off-Site Metro Parking Areas*

The East Lot is currently developed with a surface parking lot and does not include any structures. The West Lot is currently developed with one industrial/warehouse building. Access to this building was not available as part of the Historic Report. However, based on the Metro Phase I included as Appendix J.2 of this Draft EIR, this building was constructed sometime between 1981 and 1989.<sup>27</sup> Therefore, because the existing building is not 50 years of age, further evaluation was not required.

#### *(d) Nearby Historic Resources*

The Project study area encompasses approximately one parcel beyond each of the subject properties within the Project Site. As provided in the Historic Report, historic resources were identified based on findings of the City of Los Angeles’ recently completed historic resource survey, SurveyLA; the State of California Office of Historic Preservation database for local properties, the Los Angeles County Historic Property Data File; and the City of Los Angeles Zoning Information and Map Access System (ZIMAS). Included in this

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<sup>27</sup> *Haley & Aldrich, Inc., ASTM Phase I Environmental Site Assessment, North Hollywood Metro Station Development, North Hollywood, California, March 2020. Included as Appendix J.2 of this Draft EIR.*

review are properties already designated as historical resources as well as those found potentially eligible. The Historic Report identifies the six historic resources located adjacent and nearby the Project Site, all west of Lankershim Boulevard. These resources are described below.

### (1) Security Trust and Savings Bank

Constructed in 1923, the Security Trust and Savings Bank located at 5301 Lankershim Boulevard was determined eligible for listing in the National Register and is listed in the California Register. The original building permit is not available. The building is two-stories high and trapezoidal in plan, oriented east toward Lankershim Boulevard, with a secondary entrance on the south elevation fronting Weddington Avenue. The building is designed in the Beaux Arts style, with a symmetrical design, tripartite form, openings defined by pilasters, monumental entrance, elaborate cornice, and decoration with ornamental sculpture, including at spandrel panels and over the main entrance. A bank operated out of the building between 1923 and 1972, under the names Security First National Bank and Security Trust and Savings Bank. The property was also previously occupied by a bookstore and later a club called Bank Heist. The building currently functions as a restaurant and bar.

### (2) Angeleno Valley Mortuary

Constructed in 1929, the Angeleno Valley Mortuary located at 5423 Tujunga Avenue was identified as significant in SurveyLA because it is an “excellent example of a 1920s mortuary.” Designed in the Spanish Colonial Revival style, the one-story, eight-room building was constructed with wood frame construction and stucco exterior cladding. The original owner was C.W. Shirey of 11030 La Maida in North Hollywood, while the original architect was Hans Wallner. Funeral director Bernard C. McNamara ran the McNamara mortuary at the property from the late twenties until his death in 1948. The mortuary later became the De Lucia Mortuary in the 1960s and appears to have been in continuous use as a mortuary through present day. It is currently known as Angeleno Valley Mortuary. The building has an irregularly shaped floor plan with several distinct one- and one-and-a-half-story portions, stucco exterior cladding, and multiple rooflines, including both flat and shed roofs, with some red clay tile roofing.

### (3) United States Post Office

Constructed between 1933 and 1937, the United States Post Office located at 11314 West Chandler Boulevard was identified in SurveyLA as a “significant example of a US Post Office, representing the expanding population in the San Fernando Valley and the need for government services in the area,” and an “excellent example of PWA Moderne architecture, with regional influence of the Spanish Colonial Revival style.” There is no original building permit available, but a permit was issued for valuation purposes in 1938.

The primary façade is oriented north toward Chandler Boulevard South and features a flat roof near the façade with a taller, side gable roof set back. The architectural design exemplifies PWA Moderne architecture through its simple, symmetrical façade free of ornamentation, in combination with the Spanish Colonial Revival style, expressed through stucco cladding and red clay tile roofing.

#### (4) Fire Station #60

Constructed in 1949, Fire Station #60 located at 11338 West Chandler Boulevard was identified in SurveyLA as a “significant example of a post World War II bond-measure financed fire station, representing the expanding population in the San Fernando Valley and the need for municipal services in the area,” and an “excellent example of the International Style as applied to a municipal fire station. Exhibits high quality design.” There is no original building permit available. The building is two-stories high, with its primary facade, containing the main firetruck door openings, oriented west toward Tujunga Avenue. The architectural design expresses the International Style through an emphasis on horizontality with use of ribbon windows and openings bordered by flat horizontal eyebrows and canopies. An air raid siren (described below) is located on the roof of a tower at the southeast corner where the two portions of the L-shaped building meet.

#### (5) Air Raid Siren #210

The air raid siren mounted atop Fire Station #60 at 11338 West Chandler Boulevard was identified as a significant feature in SurveyLA. It was described in the survey as “Federal model 4,” the “flattened birdhouse” type, and is significant for its association “with World War II and Cold War military infrastructure.” Specifically, according to SurveyLA’s historic context statement for historical resources associated with military institutions and activities, “the sirens, as a system, represent an important phase in the history of the Federal civil defense program develop in response to World War II and the Cold War.” The “flattened birdhouse” type is composed of a cylindrical housing unit with two roof-like overhangs that run around the entire circumference; the siren is short and wide and has closely spaced overhang features.

#### (6) El Portal Theater

Constructed in 1926 and 1950, El Portal Theater located at 11200–11220 Weddington Street was locally designated as City of Los Angeles HCM No. 573 in 1993. Designed by Lewis Arthur (L.A.) Smith and designed in the Spanish Renaissance Revival style, the El Portal Theater was originally constructed for Hollywood Theaters, Inc. as a vaudeville theater and silent movie house. It was opened in 1926 by West Coast Theatres. The interior was substantially remodeled in the 1950s. The building was damaged during the 1994 Northridge Earthquake and repaired at the façade. The majority of historic material was removed from the interior at this time, but the façade and marquee were

retained, with the theater reopening in January 2000. The building expresses the Spanish Renaissance Revival style through use of stucco cladding and decoration that emphasizes verticality, elaborated with sculptural ornamentation.

## (2) Archaeological Resources

### *(a) SCCIC Records Search Results*

On June 15, 2020, staff at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton provided the results of a California Historical Resources Information System (CHRIS) records search for the Project Site and a half (0.5)-mile records search buffer, which includes the Off-Site Metro Parking Areas. Due to COVID-19, the SCCIC notified researchers that they are only providing data for Los Angeles County that are digital. The records search results provided by the SCCIC include their digitized collections of mapped prehistoric and historic archaeological resources and historic built-environment resources; Department of Parks and Recreation site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the Project Site, the National Register, the California Register, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. The confidential records search results are provided in Appendix B of the Archaeological Report.

### *(i) Previous Cultural Resources Studies*

The SCCIC records indicate that 33 previous cultural resource studies have been conducted within the records search area between 1977 and 2015. Of these, six studies are mapped as overlapping/intersecting the Project Site and Off-Site Metro Parking Areas as summarized below. As noted above, reports that are not digitally available were not provided by the SCCIC due to COVID-19 safety protocols. Regardless, the Archeological consultant concludes the reports that were provided by the SCCIC are sufficient to characterize the Project Site and Off-Site Metro Parking Areas. Moreover, the absence of the digitally unavailable reports does not materially impact the analysis or conclusions of the Archeological Report. Spatial boundaries and site forms for all previously recorded archaeological sites, even those documented by presently unavailable reports, would have been provided by the SCCIC. In addition, the existing body of technical reports that were subject to review provided a representative sample and understanding of the sensitivity with regard to cultural resources in the area. A brief summary of reviewed reports is provided below:

- LA-10180: A Determination of Eligibility Report for the North Hollywood Redevelopment Project was prepared by Roger E Hatheway in 1981 for the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). This

study was conducted in support of CRA/LA's comprehensive architectural/historical survey program. The study reviewed previously identified structures that were potentially eligible for listing in the NRHP to determine eligibility of the historic built environment resources within the survey area. No archaeological resources were identified within the current Project Site as a result of this 1981 study.

- LA-10507: A Technical Report—Historical/Architectural Resources—Los Angeles Rail Rapid Transit Project “Metro Rail” Draft Environmental Impact Statement and Environmental Impact Report was prepared by Westec Services, Inc. in 1983 for the Southern California Rapid Transit District. The study consisted of a literature review, archival research, and a pedestrian field survey. No archaeologically significant resources were identified within the Project Site as a result of this 1983 study.
- LA-10537: A Cultural Resources Technical Report for the proposed Metro Rail Line Segment 3, North Hollywood Station was prepared by Dana Slawson in 1995. Because this report was not available in digital format, it was not elaborated upon further by the SCCIC.<sup>28</sup>
- LA-08247: A study prepared by Barbara Silvia in 2000 for the proposed rehabilitation of pavement and associated improvements at the Caltrans Shop 7 Equipment Service Center. Because this report was not available in digital format, it was not elaborated upon further by the SCCIC.<sup>29</sup>
- LA-11906: The letter report for the Metro Orange Line Bus Enhancement-Pedestrian Connector to North Hollywood Red Line Station: Project Update was prepared by Emmanuel C.B. of Metro in 2012.<sup>30</sup> This supplemental letter report discussed a change in project plans to include a landscaping area adjacent to the Lankershim Transit Center Depot (Depot), which is a NRHP eligible building, located within the current Project Site. The purpose of the letter report was to get the California State Historic Preservation Officer (SHPO) concurrence that the proposed landscaping improvements would have no adverse effects to archaeological resources and no effect on the Depot. The 2012 report does not include an update on Metro's request for SHPO concurrence on “No Adverse Effect” on historic properties.

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<sup>28</sup> As noted above, due to COVID-19, SCCIC staff are working remotely and are only able to access digital files. Hardcopy records are currently inaccessible.

<sup>29</sup> As noted above, due to COVID-19, SCCIC staff are working remotely and are only able to access digital files. Hardcopy records are currently inaccessible.

<sup>30</sup> In December 2019, Metro began updating transit line names from its color-coded system to a letter/symbol system. During the transition phase, line names will include both the letter and color. However, this report was published in 2012 and includes the previous line names.

- LA-12994: An Archaeological Resources Monitoring Report was prepared for Metro by Meghan Lamb in 2015. The report documented monitoring services completed in support of a Metro project that proposed the construction of an approximately 150-foot underground pedestrian passage between the street-level North Hollywood Metro G (Orange) Line Bus Rapid Transit station and the underground North Hollywood Metro B (Red) Line subway station, located within the Project Site. A CHRIS records search completed for the project did not identify any previously recorded archaeological resources within the study area. However, observations of subsurface soils during construction monitoring determined that the area had been subject to extensive previous subsurface disturbance as a result of development and artificial fill was documented between 5 and 15 feet below the ground surface. Although no intact archaeological deposits were encountered during construction activities, 19 isolated historic-age artifacts were recovered from previously disturbed mixed-fill soils extending throughout the project area. A post-field analysis of the diagnostic or dateable resources revealed a date range from the mid to late nineteenth century to the early twentieth century. Given that these resources were determined to have been displaced from their original context, no information could be gleaned with regard to their significance to human behavior or activity. For these reasons, these resources were determined to be non-significant cultural resources and therefore ineligible for National Register or California Register listing. The report concluded that the archaeological sensitivity of the project area was low for archaeological deposits up to 5 feet below the existing ground surface and low to moderate for depths between 5 to 50 feet. Additionally, the report stated that there is a potential to encounter more historical-age resources within the project area outside of the areas and depths monitored and as such, recommended mitigation for future ground-disturbing activities within the project area.

*(ii) Previously Recorded Cultural Resources*

The SCCIC records indicate that three archaeological resources have been previously recorded within the Project Site consisting of two historic-era sites and one prehistoric isolate. These three resources are described further below. No resources were identified within the Off-site Metro Parking Areas:

- P-19-003306/ CA-LAN-003306H: Resource P-19-003306/ CA-LAN-003306H is a historic refuse deposit recorded in 2003. Material items identified included ceramic tableware, glass bottles, and miscellaneous metal that date between the early nineteenth to mid-twentieth century. The site was documented to be in poor condition due to damaging grading activities. Artifacts were collected and are currently at the San Bernardino County Museum. No record of formal evaluation was provided within related records.
- P-19-003307/ CA-LAN-003307H: Resource P-19-003307/CA-LAN-003307H was recorded in 2003 as a collection of remnant architectural features and historical-age trash scatter including both domestic and commercial trash,

specifically glass, ceramics, and metal. The site was in poor condition due to damaging grading activities; artifacts were collected and are currently at the San Bernardino County Museum. No record of formal evaluation was provided within related records.

- P-19-100281: Prehistoric isolate P-19-100281 was recorded in 1998. The isolate was a sandstone bowl uncovered three meters below the ground surface. The bowl was found intact, in excellent condition with an asphaltum stain on the exterior rim, and discovered in accordance with a clear soil change. The bowl was collected; however, the historic resources inventory form did not specify where it is currently kept. It was stated in the associated documentation that there are possibly more resources at that location, though no other cultural material was observed when the bowl was recovered. Isolated resources are generally not eligible for CRHR/NRHP listing due to their limited data potential and low likelihood of being considered “unique” resources under CEQA. However, the area should be assumed to have potential to contain archaeological deposits based on the description of previous work.

### *(iii) Review of Historic Aerials and Topographic Maps*

A review of historic aerials and topographic maps was conducted for the Archaeological Report. The first United States Geological Survey (USGS) topographic map showing the Project Site dates from 1894 and shows Southern Pacific railroad tracks in the approximate location of where Cumpston Street is currently and also three structures west of Lankershim Boulevard. The first historic aerial that includes the Project Site dates from 1952 and shows the Project Site as developed with multiple structures and the railroad, with subsequent aerials showing the Project Site as heavily developed up until 1994 after which a decrease in structures south of Cumpston Street. The 2003 historic aerials show the Project Site largely as it currently exists.

Topographic maps from 1926 to 1941 depict two structures within the West Lot and a structure within the center of the East Lot. Pacific Electric tracks were also identified bisecting the eastern half of the East Lot, and railroad tracks were identified directly north of the East Lot. These features were also identified in historic aerials. The 1948 to 2018 topographic maps showed no changes to the West Lot, but the 1948 topographic map no longer depicted a structure on the East Lot. The 1955 to 1994 topographic maps no longer depict the Pacific Electric track, only the railroad tracks directly north of the East Lot. The 1972 to 1980 historic aerials showed the West Lot as an empty lot and the 1989 to 2016 historic aerials show the West Lot as it currently exists. The 2005 to 2014 historic aerials showed the East Lot area as a dirt lot, with a few scattered trees along the perimeter. The 2016 historic aerial showed the East Lot as it currently exists.

*(b) NAHC Sacred Lands File Search*

As part of the process of identifying cultural resources within or near the Project, Dudek contacted the Native American Heritage Commission's (NAHC) on May 23, 2020, to request a review of the Sacred Lands File (SLF). The NAHC replied via email on May 27, 2020, stating that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC provided a list of nine Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site. In compliance with AB 52, the City contacted all NAHC-listed traditionally geographically affiliated tribal representatives that have requested Project notification. All records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City. Documents related to the NAHC search are included in Appendix C of the Archaeological Report (Refer to Appendix E of this Draft EIR). See Section IV.L, Tribal Cultural Resources, of this Draft EIR for further discussion and analysis.

*(c) Geomorphology and Buried Site Potential*

As discussed in the Archeological Report, the Project Site is underlain by Pleistocene to Holocene Quaternary alluvium and marine sediments generated by the Transverse Ranges encircling the San Fernando Valley. Soils at the Project Site are dominated by 25 percent Palmview (alluvial fans) and 20 percent Tujunga (alluvial fans), with minor components, including 5 percent Typic Xerothents (alluvial fans) and 5 percent San Emigdio (flood plains). All soils are characterized as coarse-loamy and/or sandy.

Holocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use, as well as represent ongoing processes of development that have potential to preserve cultural material in context, depending on area-specific topographical setting. This observed, the level of previous disturbance and record of previous findings must be taken into account when considering the potential for buried prehistoric resources to be present. As discussed in the previous summary of report LA-12994, the portion of the Project Site west of Lankershim Blvd and north of Chandler Blvd, Block 0, was documented to have been covered by 5 to 15 feet of historic-era fill, comprised of mixed soils from the surrounding area. No prehistoric material or surface soils with potential to contain intact prehistoric deposits were documented to be present during monitoring efforts in this area; although historic-era material dating to the mid-to-late nineteenth century and early twentieth century was documented to be present.

*(d) Pedestrian Field Survey and Subsurface Investigation*

Archaeological surveys focus on areas with exposed ground surface and areas of known sensitivity that have not been surveyed previously. Therefore, due to the developed nature of the Project Site and based on the SCCIC records search results, Dudek limited the archaeological survey for the Project to Block 8, located southwest of Chandler and Lankershim Boulevards, and Block 0 West, located at the northwest corner of Chandler and Lankershim Boulevards. Areas of exposed ground surface within Block 0 consist of landscaped areas surrounding the G (Orange) Line Bus plaza, the B (Red) Line subway west portal, and the Lankershim Depot. Block 8 is a dirt lot that is currently used as a Metro construction laydown yard with parked construction vehicles, equipment, and on-site office trailers. As such, an approach was employed with archaeologists walking parallel transects, spaced no more than 5 meters apart (approximately 16 feet) when possible and visually inspecting areas that were physically inaccessible. The ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. The entirety of Block 0 West was developed and landscaped whereas Block 8 has been subject to disturbances from grading and was actively being used as a Metro construction laydown yard. No archaeological resources were identified/collected within Blocks 0 West and 8 as a result of the survey.

Per the SCCIC records search, there are three archaeological resources that intersect portions of the Project Site (P-19-003306/CA-LAN-003306H, P-19-003307/CA-LAN-003307H, and P-19-100281). Given the presence of known cultural resources, subsurface exploratory probing, including three exploratory subsurface shovel test pits (STPs) and augering, to a depth of two meters was conducted on September 1, 2020, within Block 8, which is undeveloped and presently used as a staging area.<sup>31</sup> The intent of this program was to identify the extent of previous disturbance within the site and to assess the potential for subsurface cultural resources. All of the three STPs excavated showed substantial mixing of soils. Nevertheless, all three STPs were positive for historic-era archaeological resources which, although they did not include intact archaeological resources, included one or more of the following: fragments of brick, miscellaneous metal, asphalt, glass, bottle, black textile, plastic, ceramic tableware, and heavily corroded square-cut nails. The presence of a square nail in SPT 3 suggests that the refuse may be

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<sup>31</sup> See Figure 3 of the Archaeological Report, included as Appendix E of this Draft EIR, for the STP locations.

as old as the nineteenth century or early twentieth century. This is consistent with findings at the Metro station, immediately north of Block 8. No prehistoric archaeological resources were discovered during the extended subsurface investigation. Still, given that all three STPs were positive for cultural materials, and given the three archaeological resources previously recorded at the Project Site including two historic-era sites and one prehistoric isolate, the Archaeological Report concludes that the Project Site has the potential for supporting the presence of unanticipated cultural deposits within Block 8.

### 3. Project Impacts

#### a. Thresholds of Significance

##### (1) State CEQA Guidelines Appendix G

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.***

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

##### (2) 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following factors to evaluate cultural resources:

###### *(a) Historic Resources*

- If the project would result in a substantial adverse change in the significance of a historic resource, including 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 Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; and/or construction that reduces the integrity or significance of important resources on the site or in the vicinity.

(b) *Archaeological Resources*

- If the project would disturb, damage, or degrade an archaeological resource or 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;
- If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind; and
- If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it is at least 100 years old<sup>32</sup> and possesses substantial stratigraphic integrity.

In assessing impacts related to cultural resources in this section, the City will use Appendix G as the thresholds of significance. The factors identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

## **b. Methodology**

The Historic Report provided in Appendix D of this Draft EIR was prepared using sources related to the development of the Project Site. These include primary and secondary sources related to the development history of the Project Site and vicinity. Primary sources used to prepare the Historic Report include original building permits from the City of Los Angeles Department of Building and Safety, historic newspaper articles, historic photographs including aerial photographs, historic Sanborn Fire Insurance Maps, and United States Geological Service maps. Secondary sources include context statements and findings from SurveyLA contained in *SurveyLA: Historic Resources Survey Report, North Hollywood–Valley Village Community Plan Area* (February 2013).

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<sup>32</sup> *Although the CEQA criteria state that "important archaeological resources" are those which are at least 100 years old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50 years old.*

Under CEQA, the evaluation of impacts to historic resources requires a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources, and if so; (2) a determination of whether the proposed project will result in a “substantial adverse change” in the significance of the resource or resources. A “substantial adverse change” in the significance of an historical resource is an alteration that materially impairs the physical characteristics that convey its historical significance and justify its eligibility for listing.

To address potential impacts associated with archaeological resources, an Archaeological Report, included as Appendix E of this Draft EIR, was prepared. The Archaeological Report summarizes the results of the SCCIC and NAHC SLF records search, historic aerial and topographic map review, and geomorphology review for the Project Site and Off-Site Metro Parking Areas, as well as the archaeological pedestrian survey and subsurface investigation conducted for/at Blocks 0 and 8 within the Project Site. In addition, the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources. The Archaeological Report also makes recommendations for addressing the potential for encountering archaeological resources during Project construction activities.

### **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 historic resource pursuant to Section 15064.5.***

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

##### ***(a) Historic Resource Assessment***

As 11333–11345 Chandler Boulevard has not been previously evaluated for historic or architectural significance, the following evaluates the property for eligibility for listing in the National and California Registers, as well as a local HCM.<sup>33</sup> Because eligibility criteria for local HCM designation align in large degree with eligibility criteria for National and California Registers, the following evaluation from the Historic Report included as Appendix

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<sup>33</sup> On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

D of this Draft EIR considers eligibility under each of the criteria at federal, state, and local levels under a single heading. As detailed below, the assessment concludes that 11333–11345 Chandler Boulevard is not eligible for designation under any criteria.

*(i) Criterion A/1/1: Is associated with events that have made a significant contribution to the broad patterns of our history and cultural heritage.*

11333–11345 Chandler Boulevard does not appear eligible for designation under criterion A/1/1. Although the property functioned primarily as a plumbing supply since construction started in 1945, there is no evidence any of the companies that have been tenants have made substantial contributions to broad patterns of our history. Plumbing companies have participated in the post-World War II building boom by providing plumbing services but are not known to have been key players or influencers. Although new home construction was a major industry in the San Fernando Valley after World War II, building construction includes many components, only one of which is plumbing. In addition, there are not clear historical associations between any of the plumbing businesses that have been at the property and their work on any specific projects of importance. Therefore, it cannot be said that the plumbing businesses that occupied the property located at 11333–11345 Chandler Boulevard made a significant contribution to that industry and the property is therefore not eligible for designation under criterion A/1/1.

Furthermore, 11333–11345 Chandler Boulevard does not appear eligible for designation under criterion A/1/1 for its association with Southern Pacific Railroad Company. Southern Pacific Railroad Company owned the property from 1905–1991. Although an important company to the history of southern California, there is no indication that this parcel held any significance to the operations of the company. The only building that may have been used by the company was a small shed that was converted to an office around 1936. That small shed is no longer extant. There are no buildings currently on the site that were historically used by Southern Pacific Railroad Company.

*(ii) Criterion B/2/2: Is associated with the lives of persons important in our past.*

Few people have been identified as associated with the property at 11333–11345 Chandler Boulevard. One that has been identified, Charles K. Bereny, was the primary contact for Edwards Plumbing Supply Company and later president for that company. Available research did not reveal that Charles Bereny was a person important in our past. Therefore, the subject property is not eligible for designation under criterion B/2/2.

*(iii) Criterion C/3/3: 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.*

11333–11345 Chandler Boulevard is a complex of four buildings historically and currently used for plumbing supply and warehousing. The buildings are utilitarian, constructed with industrial materials, including corrugated sheet metal, and do not exhibit any architectural style. No architect or builder has been associated with the buildings. The buildings do not embody the distinctive characteristics of a type, period, region, or method of construction, nor do they represent the work of an important creative individual. The buildings most certainly cannot be said to possess high artistic values. Therefore, the buildings are not eligible for designation under criterion C/3/3.

*(iv) Criterion D/4: Has yielded, or may be likely to yield, information important in prehistory or history.*

The subject properties cannot be reasonably expected to yield information important in prehistory or history; therefore, they are not eligible under Criterion D/4.

*(v) Historic District Eligibility*

The subject properties are not located within the boundaries of any potential historic district identified by SurveyLA. Furthermore, there are no other industrial buildings 45 years of age or older near the property; there is no potential for a historic district to which the subject property could contribute.

*(b) Direct Impacts*

As discussed above, the only historic resource within the Project Site is the Lankershim Depot. However, as discussed below, the Project could also potentially impact the Security Trust and Savings Bank adjacent to the Project Site. Additional historic resources in the vicinity are located at a greater distance from the Project Site and would not be impacted by the Project. As the buildings located at 11333–11345 Chandler Boulevard have been identified as ineligible for designation, either individually or as part of a historic district, demolition of such buildings would not constitute a direct impact on historic resources.

*(i) Lankershim Depot*

The Project would have a direct impact on the location, setting, and association of the Lankershim Depot, which is proposed to be relocated approximately 44-feet to the west and 2.5-feet to the south to accommodate expansion and consolidation of transit services, specifically a new portal to the Metro North Hollywood Station. Historically used for

passenger travel, the town of Lankershim, later North Hollywood, grew up around and in direct response to the location of the Depot at this intersection. As described above, the presence of the railroad allowed for development of the townsite in the beginning of the twentieth century. Although separated from the corner by a small plaza, the Lankershim Depot has historically been very visible from Lankershim and Chandler Boulevards. The small plaza at the northwest corner of Lankershim and Chandler Boulevards has previously been identified as a character-defining feature of the Depot. Relocation of the Lankershim Depot, any distance away from the corner (i.e., moving it at all), would change the historic relationship and close association the Depot has with the prominent corner. While the relationship between the Depot and Chandler Boulevard South will also change, as seen in historic maps and historic photographs, the distance between the Depot and street has changed over time as Chandler Boulevard South has widened. The primary relationship has always been between the Depot and the intersection of Lankershim and Chandler Boulevards. Therefore, while the Depot will move slightly closer to the street to the south and bus parking will be angled, rather than parallel, this change will not constitute a direct impact to the Depot. In addition, removal of the small plaza, albeit reconstructed in 2018, and replacement with a new portal to the Metro North Hollywood Station, further diminishes the spatial relationship of the Depot to the neighborhood by reducing its visibility and thus centrality to the community. However, new landscaping will be installed that will reinterpret the historic landscaped plaza and its relationship to the Depot.

Retaining the Lankershim Depot in its existing location was determined to be infeasible. As detailed in a memorandum by Kimley-Horn and Associates, dated March 10, 2020, the relocation plan was selected through a design process aimed to incorporate all of Metro's requirements while having the least impact on the Depot (see Historic Report Attachment F). Alternatives considered included constructing the new portal at the north side of the block, close to the existing portal on the west side of Lankershim Boulevard or enlarging the existing portal. Both of these alternatives were determined infeasible due to the size of expected future ridership and maintaining the location of the Depot would create circuitous, inefficient paths from the G (Orange) Line to the portals and other bus routes/bus bays.

While relocation will have a direct impact on the Depot, the Historic Report concludes it is feasible to relocate and rehabilitate the Depot in conformance with the Secretary's Standards without causing any additional impacts on the Depot.

Once the Lankershim Depot has been relocated, there is a potential for additional direct impacts due to vibration and construction activities nearby. Demolition, excavation, and new construction on Block 0 could cause damage to the building's new foundation and/or the building itself.

Mitigation Measures CUL-MM-1 through CUL-MM-3, detailed below, and Mitigation Measure NOI-MM-2 discussed in Section IV.H, Noise, of this Draft EIR, would be included in the Project to reduce direct impacts to the Lankershim Depot to the extent feasible. However, even with implementation of the mitigation measures, impacts to the Lankershim Depot would be significant and unavoidable, as the relationship of the Depot to the intersection of Lankershim and Chandler Boulevards would be lost. Mitigation Measure NOI-MM-2 discussed in Section IV.H, Noise, of this Draft EIR, and summarized below would fully mitigate direct impacts to the Security Trust and Savings Bank.

*(ii) Security Trust and Savings Bank*

There is also potential for a direct impact to the Security Trust and Savings Bank adjacent to the Project Site (Block 8) due to vibration and construction activities. In addition to the potential for damage to the adjacent building from vibration, excavation and new construction could result in settling or displacement of the building's foundations. Such impacts would be significant and mitigation measures are required.

Construction methods, particularly excavation and shoring for footings, foundations and other sub-grade construction activities including proposed subterranean parking, should be undertaken in a manner that will not result in material alteration of adjacent historical resources. Pursuant to Mitigation Measure NOI-MM-2 in Section IV.H, Noise, of this Draft EIR, a pre-construction survey would be performed to establish baseline conditions and vibration levels to be monitored during construction to ensure that they do not cause damage to historical resources. Property owners/managers of the adjacent buildings should also be contacted prior to, and throughout, construction to determine if damage occurs to their properties.

With the implementation of Mitigation Measure NOI-MM-2, the proposed new construction would not result in material alteration of the adjacent Security Trust and Savings Bank. The Project therefore would conform with Secretary's Standard 5, which states that "distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved."

*(c) Indirect Impacts*

The Project would not have an indirect impact on the setting of the six identified historical resources located adjacent to and nearby the Project Site and Off-Site Metro Parking Areas. In general, CEQA describes an indirect impact as one that occurs when the "...alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." (CEQA Guidelines Section 15064.5(b)(1)). As described above, this area of North Hollywood has experienced tremendous development over the last 20 years. With substantial new construction in the

neighborhood, there is no longer a sense of the historic commercial corridor that once lined Lankershim Boulevard. There is very little vestige of the industrial development that once lined the railroad tracks. The six identified historical resources have become isolated remnants; there is no sense of connection between these properties nor sense of time and place from an earlier era.

With respect to its most proximate historic resource, the Project would not have an indirect impact on the Security Trust and Savings Bank adjacent to the Project Site. Historic photos show the building flanked to the north by low-scale commercial buildings, constructed to the sidewalk line. As none of these buildings visible in historic photos are extant, the setting to the Security Trust and Savings Bank has already been lost. Block 8 of the Project, which would be constructed on two sides of the Security Trust and Savings Bank, has been designed to step up and away from the west elevation of the historic building, thereby further minimizing potential indirect impacts.

While the Project would represent another change to this area of North Hollywood, with so few historical resources present, and no continuity between them, the Project would not further detract from the already altered setting of the six historical resources. Furthermore, the relative mass and size of the new development is similar to other new development that has taken place in this area of North Hollywood in recent years. Therefore, the setting of the identified historic resources would not be further impacted by the Project.

*(d) Conclusion*

**As discussed above, the Project would implement Mitigation Measures CUL-MM-1 through CUL-MM-3 and NOI-MM-2 to mitigate direct impacts to the Lankershim Depot to the extent possible. Mitigation Measure NOI-MM-2 discussed in Section IV.H, Noise, of this Draft EIR, would fully mitigate direct impacts to the Security Trust and Savings Bank. However, direct impacts to the Lankershim Depot would remain significant and unavoidable because the relationship to the intersection of Lankershim and Chandler Boulevards would be lost. Indirect impacts to historic resources would be less than significant without mitigation.**

**(2) Mitigation Measures**

The following mitigation measures are proposed with respect to historic resources:

**Mitigation Measure CUL-MM 1: Conformance with the Secretary's Standards—**  
Prior to commencement of construction on Block 0, as approved by Metro, the developer shall engage an architectural historian or historic architect meeting the Secretary of the Interior's Professional

Qualifications Standards (Architectural Historian) to ensure the Lankershim Depot is relocated in conformance with the Secretary's Standards and guidance provided in *Moving Historic Buildings* by John Obed Curtis (National Park Service, 1979). The Architectural Historian shall review all aspects associated with the relocation, including building preparation and stabilization, the proposed method of moving the building, receiver site preparation, and rehabilitation at the receiver site. The Architectural Historian shall also consider plans for the historic landscaped plaza to ensure they conform with the Secretary's Standards, specifically Standard 9 that states that "new work will be differentiated from the old and will be compatible with the historic materials and features." Once details of the relocation, rehabilitation, and landscaped plaza have been finalized, the architectural historian shall prepare a report reviewing the relocation and rehabilitation of the Depot and landscaped plaza for conformance with the Secretary's Standards, submitted to the City of Los Angeles Office of Historic Resources for concurrence. After work is complete, the architectural historian shall document, through photographs, that work was completed in conformance with the with the approved report. Photographic documentation shall be submitted to the City of Los Angeles Office of Historic Resources.

**Mitigation Measure CUL-MM-2:** Documentation—Prior to commencement of construction on Block 0, as approved by Metro, the Applicant shall engage a professional architectural photographer and an architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards (Architectural Historian) to implement Historic American Building Survey (HABS) Level II documentation of the current status of the Lankershim Depot and its setting consisting of both photographs and a written narrative. The Architectural Historian shall direct the photographer to take images and no fewer than 15 photographs shall be used to document the current status of the Depot and its setting. The photographs shall be large format, 4-inch by 5-inch , black-and-white negatives (two sets), contact prints (one set), and 8-inch by 10-inch prints (two sets). All shall be archivally processed and prints shall be made on fiber-based paper. Two original negatives shall be made at the time the photographs are taken. One set of negatives shall travel with a set of contact prints to the National Park Service for entry into the HABS collection in the Library of Congress; the second set of negatives shall be transmitted to the Los Angeles Public Library along with one set of 8-inch by 10-inch prints. The written narrative shall reformat the information contained in this report and be transmitted to the repositories named. The draft documentation shall be assembled by the Architectural Historian and submitted to the City of Los Angeles Department of City Planning or designee for review and approval prior to submittal to the repositories. The City of Los Angeles Department of City Planning or

designee shall accept the final documentation prior to relocation of the Lankershim Depot.

**Mitigation Measure CUL-MM-3: Interpretive Design**—The Applicant shall prepare and implement a site-specific, art-in-public-places program on Block 0 that illustrates and interprets the important history of the Lankershim Depot to the development of North Hollywood. The public art program shall include feature(s) that are lasting and permanent and shall be integrated into the new architecture and/or new landscape features of the Project, to the maximum extent feasible, thus ensuring its longevity, and shall be accessible by all members of the public. While the public art program may incorporate a plaque or interpretative panel or display the program overall shall include features that are of a size, scale, and design in relation to the architecture and/or landscape features that it can be immediately viewed, recognized, and appreciated at a distance where the text or images on a plaque or interpretive panel or display may not be legible while maintaining a scale compatible with the Lankershim Depot. Content and design of the public art shall be created by an artist, in collaboration with the selected art consultant, a representative from Metro, and the architectural historian meeting the Secretary of the Interior's Professional Qualification Standards to ensure that the art-in-public-places program on Block 0 accurately interprets the history of the site. Installation of art elements shall be completed no more than one year after relocation and rehabilitation of the Lankershim Depot. Prior to commencement of construction on Block 0, as approved by Metro, a budget will be established for the public art that will be sufficient to cover design fees and fabrication.

As noted above, the Project would also implement Mitigation Measure NOI-MM-2 discussed in Section IV.H, Noise, of this Draft EIR. Mitigation Measure NOI-MM-2 requires a pre-construction survey of the Lankershim Depot and Security Trust and Savings Bank and preparation of a shoring design to protect the buildings from potential damage. Mitigation Measure NOI-MM-2 also requires a qualified acoustical engineer to develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Lankershim Depot and the Security Trust and Savings Bank building during demolition and grading/excavation phases. In the event the standard warning level of 0.10 PPV for historic structures is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. In the event the regulatory level of 0.12 PPV is triggered, the contractor shall halt construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart. At the conclusion of vibration-causing construction, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to immediately

adjacent historic buildings and recommendations for repair, as may be necessary, in conformance with the Secretary's Standards. Repairs to immediately adjacent historic buildings shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

### (3) Level of Significance After Mitigation

Mitigation Measures CUL-MM-1 through CUL-MM-3 would mitigate direct impacts to the Lankershim Depot to the extent possible. Mitigation Measure NOI-MM-2 discussed in Section IV.H, Noise, of this Draft EIR, would fully mitigate direct impacts to the Lankershim Depot and Security Trust and Savings Bank. However, direct impacts to the Lankershim Depot would remain significant and unavoidable because the relationship to the intersection of Lankershim and Chandler Boulevards would be lost. Indirect impacts to historic resources would be less than significant without mitigation.

***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

As noted above, due to the developed nature of the Project Site and Off-Site Metro Parking Areas, and based on the SCCIC records search results, Dudek limited the archaeological survey for the Project to Block 8, located southwest of Chandler and Lankershim Boulevards, and Block 0 West, located at the northwest corner of Chandler and Lankershim Boulevards. The remaining portions of the Project Site and Off-Site Metro Parking Areas are paved, occupied by buildings, or otherwise do not allow for direct inspection of exposed earth ground surfaces with potential to contain archaeological material. No newly identified archaeological resources were recorded during the pedestrian survey of Blocks 0 West and 8 of the Project Site, with most of the visible surface soils within these areas having been previously disturbed. Additionally, a search of the NAHC's SLF was negative for the presence of Native American resources. Nevertheless, the SCCIC records search identified three previously recorded archaeological resources that intersect or fall adjacent to the Project Site, including two historic-era refuse deposits (P-19-003306/CA-LAN-003306H and P-19-003307/CA-LAN-003307H) and one prehistoric sandstone bowl (P-19-100281). Moreover, the subsurface investigation within Block 8 identified isolated historic-era cultural material up to two meters below the surface through exploratory excavation of three shovel test probes (STPs). Therefore, while the Archaeological Report concludes that the Project Site appears to be underlain by mixed soils, the exact nature and degree of this disturbance is somewhat unclear. Given the isolated nature of the reported prehistoric stone bowl, and the absence of other prehistoric archaeological material or deposits, the Project Site and Off-Site Metro

Parking Areas appear to have a low potential for archaeological resources and it is quite possible that this item was either improperly documented or was in a secondary context. However, as noted in the Archaeological Report, historic-era cultural material has been documented in both Block 0 West and Block 8, as well as near the eastern portion of the project along Cumpston Street. Because the Project would require excavations to depths of up to 60 feet below grade for construction of the subterranean parking levels, the Project could potentially disturb previously unidentified archaeological resources, if present. **As such, construction activities associated with the Project could result in substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, which is a potentially significant impact. Mitigation Measures CUL-MM-4 through CUL-MM-6 below would reduce this potential impact to a less-than-significant level.**

## (2) Mitigation Measures

The following mitigation measures are proposed with respect to archeological resources:

**Mitigation Measure CUL-MM-4:** All construction personnel and monitors who are not trained archaeologists or Tribal Cultural experts shall be briefed regarding unanticipated archeological or Tribal Cultural discoveries prior to the start of any excavation and grading activities. A basic PowerPoint presentation or handout shall be prepared to inform all personnel working on the Project about the archaeological and Tribal Cultural sensitivity of the area. The purpose of this Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological and Tribal Cultural materials that may be identified during excavation and grading activities for the Project and explain the importance of and legal basis for the protection of significant archaeological resources and all Tribal Cultural Resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources, Tribal Cultural Resources, or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.

**Mitigation Measure CUL-MM-5:** Prior to any excavation activities, an individual qualified in archaeology and Tribal Cultural Resources (Qualified Archaeologist) shall be retained to monitor initial excavation and grading activities within the Project Site. Initial excavation and grading are defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to archaeological monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by project-related

construction. Due to the complex history of development and disturbance in the area, the terminal depth of potential deposits cannot be determined prior to the start of excavation activities. Monitoring will be continued based on the continued potential for cultural deposits based on the characteristics of subsurface sediments encountered. The Qualified Archeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The Qualified Archeologist shall be responsible for maintaining daily monitoring logs. Within 60 days following completion of ground disturbance, an archaeological monitoring report shall be prepared and submitted to the City for review. This report shall document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the SCCIC. In the event that a potential archaeological resource is encountered, the Applicant shall follow the procedures set forth in Mitigation Measure CUL-MM-6. In the event that a potential Tribal Cultural Resource is encountered, the applicant shall instead follow the procedures set forth in Mitigation Measure TCR-MM-1.

**Mitigation Measure CUL-MM-6:** In the event that historic or prehistoric 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 archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All 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 Public Resources Code 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 resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the Qualified Archaeologist in

coordination with the City and 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, 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.

### (3) Level of Significance After Mitigation

Project-level impacts with regard to archaeological resources would be less than significant with implementation of Mitigation Measures CUL-MM-4 through CUL-MM-6.

***Threshold (c): Would the project disturb any human remains, including those interred outside of dedicated cemeteries.***

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study included as Appendix A of this Draft EIR, the Project Site is located within an urbanized area and has been subject to previous grading and development and the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the NAHC who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. **Impacts related to human remains would be less than significant, and no mitigation measures are required.**

## e. Cumulative Impacts

### (1) Impact Analysis

As provided in Section III, Environmental Setting, of this Draft EIR, there are 34 related projects in the Project Site vicinity. While the majority of the related projects are located a substantial distance from the Project Site and Off-Site Metro Parking Areas, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects involve a variety of residential uses (i.e., apartments and condominiums), retail, restaurant, commercial, and office uses, consistent with existing uses in the Project Site area.

Within the study area, there is only one other related project adjacent to the Project Site and Off-Site Metro Parking Areas. Related Project No. 1 at 5401 Lankershim Boulevard is under construction with a seven-story building that will have ground floor retail with one story of parking and five stories of multi-family residential above. Prior to construction, the site was developed with one, small building that was not 50 years of age at the time of project implementation. That project was not found to have potential historic resources impacts under CEQA.

As the one other related project within the study area does not have any impacts to historic resources, there are not any cumulative impacts to historic resources. CEQA Guidelines Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Because Related Project No. 1 does not have any impacts to historic resources, neither a direct nor an indirect impact, the Project would not result in any cumulative impacts to historic resources within the study area. **Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.**

With regard to potential cumulative impacts related to archaeological resources, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering archaeological resources. **Therefore, cumulative impacts to archaeological resources would be less than significant and would not be cumulatively considerable.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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