

IV.B CULTURAL RESOURCES

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. Historical 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. This section is based on information provided in Appendix C-1 of this Draft EIR, which includes the *Historical Resources Technical Report, Historic Resources Group, November 2021*.

1. 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:

- National Historic Preservation Act of 1966, as amended
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- Native American Graves Protection and Repatriation Act
- Archaeological Resources Protection Act
- Archaeological Data Preservation Act
- California Environmental Quality Act
- California Register of Historical Resources
- California Health and Safety Code
- California Public Resources Code
- City of Los Angeles General Plan
- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3)
- City of Los Angeles Historic Resources Survey

(1) Federal

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

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment”.¹ 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.²

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.”³

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

¹ 36 Code of Federal Regulations (CFR) 60. <https://www.energy.gov/sites/prod/files/2016/02/f29/CFR-2012-title36-vol1-part60.pdf>. Accessed January 27, 2021.

² United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Questions. <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>. Accessed January 27, 2021.

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

- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁴

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

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

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

(i) Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following 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.⁵

(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...

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

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

is made clear.”⁶ 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.”⁷ The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

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

(iv) Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.⁸ 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.⁹ 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

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

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

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

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

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

(b) Secretary of the Interior's Standards

The National Park Service issued the Secretary'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'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's Standards 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.¹⁰

It is important to note that the Secretary'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.¹¹

¹⁰ 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.

¹¹ United States Department of the Interior, National Park Service, Native American Graves Protection And Repatriation Act. <https://www.nps.gov/archeology/tools/laws/nagpra.htm>. Accessed January 27, 2021.

(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. The 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. The 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.¹²

(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, 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

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

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.¹³ 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.¹⁴

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”.¹⁵ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the

¹³ California Public Resources Code Section 1083.1(a), http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=21083.2. Accessed January 27, 2021.

¹⁴ State CEQA Statute and Guidelines, Section 15064.5(c)(4).

¹⁵ State CEQA Guidelines, Section 15064.5(b)(1).

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.¹⁶

(b) California Register of Historical Resources

The 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.”¹⁷ 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.¹⁸ 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:

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.

¹⁶ State CEQA Guidelines, 15064.5(b)(3).

¹⁷ California Public Resources Code, Section 5024.1[a].
http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=5024.1.
 Accessed January 27, 2021.

¹⁸ California Public Resources Code, Section 5024.1[b].
http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=5024.1.
 Accessed January 27, 2021.

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 Public Resources Code (PRC) Section 5097.98, as amended by Assembly Bill 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.¹⁹

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) *Brentwood-Pacific Palisades Community Plan*

¹⁹ City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed January 27, 2021.

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. The Brentwood-Pacific Palisades Community Plan contains the following goals, objectives, and policies related to the preservation of historic and cultural resources:

- Objective 1-4: To preserve and enhance neighborhoods with a distinctive historic character.
 - Policy 1-4.1: Protect and encourage reuse of the area's historic resources.
 - Policy 1-4.2: Preserve architecturally or historically significant features and incorporate such features as an integral part of new development when appropriate.
- Goal 17: A community which preserves and restores the monuments, cultural resources, neighborhoods, and landmarks which have historic and/or cultural significance.
 - Objective 17-1: To ensure that the Plan Area's significant cultural and historic resources are protected, preserved, and/or enhanced.
 - Policy 17-1.1: Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public.

(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 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 or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of historic personages important to national, state, 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.²⁰

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 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?
- Has the building retained “integrity”? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for

²⁰ City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

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 Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist 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.”²¹

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

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (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.²² Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.²³ 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*

The City of Los Angeles Historic Resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City’s history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning’s OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys

²¹ City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

²² City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

²³ City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

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 Community Redevelopment Agencies. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

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

b) Existing Conditions

(1) History and Description of the Surrounding Area

(a) *Brentwood*²⁴

The Project Site is located in the Brentwood community of the Brentwood-Pacific Palisades Community Plan Area (CPA) in the City of Los Angeles. Brentwood is overwhelmingly residential

²⁴ Description and history of Brentwood excerpted and adapted from City of Los Angeles, Department of City Planning, *Historic Resources Survey Report: Brentwood-Pacific Palisades Community Plan Area*, prepared by Historic Resources Group, November 2013.

in development but also contains a handful of historic commercial clusters that service the surrounding neighborhoods. These are located along the eastern stretch of San Vicente Boulevard, at 26th Street and San Vicente Boulevard (Brentwood Country Mart), and at the intersection of Barrington Avenue and Sunset Boulevard (Brentwood Village). In addition, the Wilshire corridor is entirely commercial in use, although most of the extant development dates from the later part of the 20th century. The Brentwood Country Club near the western end of Brentwood provides a verdantly landscaped island in the middle of residential neighborhoods.

(i) *Development History*

The name “Brentwood” first appears in 1906, when the Western Pacific Development Company bought 350 acres from the Santa Monica Land and Water Company and announced development of an exclusive tract to be known as Brentwood Park. Said to be located “midway between the National Soldiers’ Home and the Pacific,” the tract extended north from San Vicente Boulevard beyond Sunset (then Beverly) Boulevard, with Bristol Avenue, originally called Grand Avenue, as its central thoroughfare. Subdivision activity also accelerated during the 1920s. San Vicente Park (running along Bundy between Wilshire, then called Nevada, Boulevard and Montana Avenue), Brentwood Canyon Estates (along Carmelina Avenue), Brentwood Green (north and south of Sunset along Gretna Green and Kenter) were some of the tracts recorded during the decade. While building activity may have slowed in the early 1930s, it recovered as the decade progressed. Brentwood Glen, although subdivided in the 1920s as the Ratteree Tract, saw its definitive development between 1935 and 1942. Denser in layout than many other Brentwood neighborhoods, this Westwood-adjacent enclave saw its growth stimulated by the opening of the University of California, Los Angeles (UCLA) campus in 1929, attracting many members of the UCLA faculty. As construction of single-family homes accelerated to meet demand in the post-World War II years, builders ventured further up the canyons north of Sunset Boulevard. These years also witnessed a large leap in the scale of single-family development efforts. Additionally, a neighborhood of multi-family apartment buildings was constructed on the old Westgate tract (named “Westgate” because it was located adjacent to the west gate of the Soldiers’ Home).

Brentwood was from the outset a “suburb, away from the noise, dust, and inharmonies of the city.” A handful of commercial and institutional developments supported the growth of the community. As the main street of the Brentwood community and site of the interurban railway tracks that linked the area with the rest of Los Angeles, San Vicente Boulevard immediately west of the Old Soldiers’ home developed as the first commercial and institutional enclave. In 1928, the Sisters of St. Joseph of Carondelet constructed a Catholic women’s college, Mt. Saint Mary’s, on 33 acres in the Brentwood hills. The Brentwood Country Club, which had a checkered history, changing sites and owners over the years, was established in its current location by the late 1920s. The Brentwood Presbyterian Church was constructed in 1929 and expanded following World War II. One of the most notable landmarks of the CPA, the Eastern Star Home, a retirement facility now the home of the Archer School, was erected on Sunset Boulevard in 1931, its Spanish Colonial Revival architecture by the William R. Mooser Company epitomizing the characteristics of the style. In 1943, the University Synagogue was organized and in 1955 moved into its permanent

home on Sunset Boulevard and Saltair Avenue. Brentwood Country Mart opened in 1948 on land set aside in the 1920s Brentwood Place subdivision for commercial purposes. Brentwood Village developed around the same time, spurred by the post-war residential explosion in the area.

(ii) *Resources in the Area*

SurveyLA has identified the following potential resources in the vicinity of the Project Site: 1) Vicente Foods, 12021 San Vicente Boulevard; 2) Brentwood Presbyterian Church, 11996 San Vicente Boulevard; 3) 11920-11928 San Vicente Boulevard, 11927 Montana Avenue; and 4) Shairer House, 11750 Chenault Street. None of these resources have been formally designated in the National or California Registers, or as a City of LA HCM. Nonetheless, the Project would not impact the eligibility or status of these potential resources as demonstrated in the memorandum prepared by Historic Resources Group, which is included as Appendix C-2 of this Draft EIR.

(2) Development of the Project Site

(a) *Development History*

The Barry Building was constructed in 1951 by David Barry, Jr., who hired architect Milton Caughey to design the two-story commercial office building with shops on the ground floor, wrapping a central courtyard lushly landscaped with tropical plants. In 1961, William and Thelma Dutton started a bookstore in North Hollywood. In 1984 William and Thelma Dutton opened the Dutton's bookstore in the Barry Building, which over the years became a beloved neighborhood gathering place and local literary center with many events and book signings.

In 1993, a one-story receiving and storage addition was constructed on the north side of the building. Another alteration in that area was removal of the screens separating the rear patios from the parking lot. A ramp was discretely added on the southeast side to enter the courtyard space. The landscaped courtyard was also changed.

(b) *Milton H. Caughey, Architect, 1911-1958*²⁵

The Barry Building was designed by Los Angeles architect Milton H. Caughey. Caughey earned his Bachelor of Arts from Amherst College in 1934 and Master of Fine Arts from the Yale School of Architecture in 1938. In the summer of 1936, he worked in New York City for the influential Neoclassicist firm of McKim, Meade and White. After graduation he worked from 1938-39 for George Howe and later William Lescaze on buildings for the New York World's Fair; in 1932 Howe and Lescaze had designed the first International Style high-rise building in the United States, the Philadelphia Savings Fund Society (PSFS) building. In 1940 Caughey moved to Los Angeles, where he worked for March, Smith and Powell until 1942 when he joined the U.S. Naval Reserve

²⁵ Biological information on Milton Caughey excerpted and adopted from Los Angeles Department of City Planning Recommendation Report, CHC-2007-1585-HCM, May 3, 2007.

as a lieutenant. In 1947 he opened his own architectural practice in Los Angeles, Milton Caughey and Associates. From 1953-57 he worked in partnership with Brentwood architect Clinton C. Ternstrom. Caughey died suddenly of a heart attack in 1958 at the age of 46.

Caughey's work consisted primarily of residences and schools; the Barry Building is one of his few commercial projects. He received four Merit Awards for Excellence in Design and Execution from the Southern California Chapter of the American Institute of Architects; two in 1954, for the Pachappa School in Riverside and the Hillburg residence at Capistrano Beach; and two more in 1957 for the Riverside Juvenile Hall and the Monroe School, also in Riverside. Other notable projects include the Garred (1949) and Goss (1950) residences, both in Brentwood; the Barrington Playground (1950); his own residence (1951) on Chenault Street in Brentwood; and several schools in Riverside including Mountain View Elementary (1954), Victoria Elementary (1955), Ramona High (1956-57), Highland Elementary (1957) and Rubidoux High (1957-58).

(3) Historical Resources Evaluation

(a) *Description of Evaluated Resource*

The Project Site is currently developed with the two-story Barry Building and a surface parking lot. The building was designed in the International Style by architect Milton H. Caughey and constructed in 1951. It is set back from San Vicente Boulevard by a narrow concrete-paved plaza with low planters. The building is flanked to the east by a shared driveway and to the north by the surface parking lot, both paved in asphaltic concrete.

The building consists of four wings of offices around a central garden courtyard, forming an open square in plan. It has complex massing and is asymmetrically composed. The building has flat roofs at varying heights, with parapets around the perimeter and cantilevered plaster soffits with wood fascias around the courtyard. The second story of the south wing is supported on slender steel pipe columns, leaving the ground floor open to both San Vicente Boulevard and the central courtyard. A small freestanding structure, slightly rotated from the building's orthogonal plan relative to San Vicente Boulevard, is located under the southeast corner. The exterior walls are veneered in smooth cement plaster. Fenestration consists of fixed, wood-framed windows and window walls, and steel-sash casement windows. The second-story windows on the primary (south) façade are grouped in horizontal bands and were originally screened with louvered wood grilles. Individual unit entrances consist of flush wood doors with fixed transom lights.

The courtyard is raised slightly above street grade and is accessed by wide, angled steps. The central portion of the courtyard is paved with flagstone; the perimeter is a concrete walkway that provides access to the first-floor office suites. The courtyard is landscaped with raised flagstone and concrete planters containing a variety of palm trees. Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second-story balconies that encircle the courtyard. Each staircase consists of "floating" concrete treads in steel pans supported on triangular concrete mono stringers, with metal pipe railings. The four

balconies are each at a different level, corresponding to the different second-floor levels in each of the four wings, and have canted steel pipe guardrails. Louvered and gridded wood screens shelter portions of the east and west balconies. A passage at the northeast corner of the courtyard connects it to the rear parking lot.

The interiors of the office suites are finished with wood flooring, plaster walls, and textured acoustical plaster ceilings. Photos of the building are shown on Figures IV.B-1 through IV.B-5.

(b) Historic Context: SurveyLA Contexts and Themes

Since the Barry Building is a designated City of Los Angeles HCM, as described previously, it was not re-evaluated by SurveyLA. The property does not appear to have been previously evaluated for eligibility for listing in the California or National Registers. Utilizing contexts and themes developed by SurveyLA, the Historic Resources Technical Report (included in Appendix C-1 of this Draft EIR) evaluates the Barry Building for eligibility for state and federal designation. The Barry Building does not meet eligibility criteria for any of the themes developed for SurveyLA's Commercial Development context; therefore, it is not evaluated for eligibility under Criteria A/1 or B/2. It does appear to meet eligibility criteria for the Architecture and Engineering context, and therefore is evaluated within the Architecture and Engineering context, Los Angeles Modernism (1919-1980) sub-context, Postwar Modernism (1946-1975) theme, and Mid-Century Modernism (1945-1975) sub-theme.

Resources evaluated under the Mid-Century Modernism sub-theme are significant in the area of architecture as examples of the Mid-century Modern style and exhibit quality of design through distinctive features. Mid-century Modernism is a broad classification of postwar modernism and represents one of the largest and most diverse collections of architecture in Los Angeles. The style is generally characterized by its geometric forms, smooth wall surfaces, flat or low-pitched roofs, and absence of exterior ornamentation. While some examples of the style may represent a particular influence – such as Post-and-Beam or Organic architecture – many incorporated elements of the various influences that shaped this style. It was a remarkably versatile style that was applied to almost every type of property: residential, commercial, institutional, and industrial.

The period of significance for the context/theme/property type combination is 1945-1975. Details of the criteria, eligibility standards, character-defining features, and integrity considerations are provided in the Historical Resources Technical Report included as Appendix C-1 of this Draft EIR.

(c) Evaluation of Eligibility

The Barry Building was designated by the City as HCM No. LA-887 in 2007. The property is significant under the City's Cultural Heritage Ordinance Criterion 1, because it reflects "the broad cultural, political, economic or social history of the nation, state, or community." The building was the longtime home of Dutton's Brentwood Books, whose sponsorship of book signings and readings with local writers made it a symbol for the Los Angeles literary scene and fostered a sense of cultural identity along the San Vicente commercial corridor in Brentwood. The Barry

Building is also significant under City's Cultural Heritage Ordinance Criterion 3, because it "embodies the distinguishing characters of an architectural-type specimen, inherently valuable for a study of a period, style of method of construction," as an example of International Style architecture.²⁶ The Barry Building is considered a presumptive historical resource as defined by CEQA for purposes of this analysis. However, it appears that the Barry Building has not previously been evaluated for eligibility for listing in the National or California Registers; therefore, the property is evaluated below within the applicable SurveyLA contexts and themes for eligibility for listing in the National and California Registers.

(i) *Criterion C/3/3 (Architectural Merit or Work of a Master Architect)*

According to National Park Service guidance, to be eligible under Criterion C/3/3 a building must clearly contain enough of the "distinctive characteristics" to be considered a true representative of the style or type. Buildings eligible for artistic merit must embody the distinctive characteristics of a type, period, or method of construction, and they must possess high artistic value. A building with some applied detailing is not eligible if the details are not fully integrated into the overall design.

The Barry Building is an example of Mid-century Modern commercial architecture in Los Angeles and embodies a distinctly local expression of the style. The building's organization around a central courtyard with lush tropical landscaping, serving as both a central circulation hub and outdoor gathering space, reflects the particular Southern California ideal of indoor-outdoor living. The clustered building masses around the courtyard reflect the severe minimalism of the International Style, with smooth plaster walls, large windows, and flat roofs. The building retains most of the essential character-defining features from its period of significance, including expressed steel pipe columns, simple geometric volumes, unadorned plaster wall surfaces, flat roofs with wide overhanging eaves, floor-to-ceiling windows, and horizontal massing; as well as its landscaped courtyard, curvilinear concrete-and-steel staircases, and cantilevered inner walkways with steel pipe guardrails and louvered screens. The Barry Building is therefore eligible for listing in the National Register and the California Register under Criterion C/3. The property's period of significance under this criterion is 1951, the year in which it was constructed.

(ii) *Evaluation of Integrity*

As noted previously, historic integrity is the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's prehistoric or historic period." The National Park Service defines seven aspects of integrity for historic resources. These are location, design, setting, materials, workmanship, feeling, and association. The integrity of the Barry Building is

²⁶ Barry Building Resource Report, "Historic Places L.A", <http://historicplacesla.org/reports/f9bb1c73-ef15-471a-ad5e-13889f5d6cdd>, accessed April 11, 2022.

evaluated below based on these seven aspects. The property's period of significance under Criterion C/3/3 is 1951.

- **Location:** The Barry Building remains on its original site and therefore retains integrity of location.
- **Design:** The Barry Building retains most of the essential character-defining features of its distinctive Mid-Century Modern design, including its central courtyard with lush tropical landscaping, open ground floor framed with steel pipe columns, simple geometric volumes, unadorned plaster wall surfaces, flat roofs with wide overhanging eaves, floor-to-ceiling windows, horizontal massing, curvilinear concrete-and-steel staircases, and cantilevered inner walkways with steel pipe guardrails and louvered screens. It therefore retains integrity of design.
- **Setting:** Although several properties in the surrounding area have been redeveloped in later years, some in a markedly larger scale, the Barry Building remains on a busy commercial thoroughfare in Brentwood and thus retains integrity of setting.
- **Materials:** The Barry Building retains most of its original character-defining materials including plaster walls, steel pipe columns and railings, and steel-and-concrete staircases. It therefore retains integrity of materials.
- **Workmanship:** The Barry Building retains most of its character-defining features and materials from the period of significance, and thus retains the physical evidence of the crafts of mid-20th century commercial design and construction in Los Angeles. It therefore retains integrity of workmanship.
- **Feeling:** The Barry Building retains integrity of location, design, setting, materials, and workmanship, and therefore retains the essential physical features that convey the aesthetic and historic sense of a Mid-Century Modern commercial building in Brentwood in the 1950s. It therefore retains integrity of feeling.
- **Association:** The National Park Service defines association as the direct link between an important historic event or person and a historic property. The Barry Building is not significant for an association with an important historic event or with Milton H. Caughey, the architect. Therefore, integrity of association is not applicable in determining the property's historic integrity.

(iii) *Summary of Eligibility*

The Barry Building is significant under Criterion C/3 as an example of Mid-century Modern commercial architecture in Los Angeles, and retains integrity of location, design, setting, materials, workmanship, and feeling. It is therefore eligible for listing in the National Register and the California Register.



Photo 1 : Barry Building, overall view northeast from San Vicente Boulevard.



Photo 2: Barry Building primary (south) Façade, view northwest from San Vicente Boulevard.

Figure IV.B-1
Photos of the Barry Building, Views 1-2



Photo 3: Barry Building, east façade and driveway, view northwest from San Vicente Boulevard.



Photo 4: Barry Building, overall view southwest from parking lot.

The Project Site only includes the portion of the parking lot to the immediate north of the building. The portion of the parking lot on APN 4404-025-016 is not part of the Project Site.

Figure IV.B-2
Photos of the Barry Building, Views 3-4



Photo 5: Barry Building, north façade, view southwest from parking lot.



Photo 6: Barry Building, west façade, view southeast from adjacent parcel.

Figure IV.B-3
Photos of the Barry Building, Views 5-6



Photo 7: Barry Building, courtyard, view northwest from San Vicente Boulevard.



Photo 8: Barry Building, courtyard, view southwest from second floor balcony.

Figure IV.B-4
Photos of the Barry Building, Views 7-8



Photo 9: Barry Building, courtyard, view northeast from second floor balcony.



Photo 10: Barry Building, interior, typical first floor office suite, view northeast.

Figure IV.B-5
Photos of the Barry Building, Views 9-10

2. Project Impacts

a) Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with the State CEQA Guidelines Appendix G (Appendix G), a project would have a significant impact related to cultural resources if the project would do the following:

Threshold (a): Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5; or

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

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

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

(2) 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to cultural resources:

(a) Historical Resources

If the project would result in a substantial adverse change in the significance of an historical resource due to any of the following:

- 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; or
- Construction that reduces the integrity or significance of important resources on the Project Site or in the vicinity.

b) Methodology

The analysis of historical resources was prepared using sources related to the Project Site's development, including: (1) historic permits for properties within the Project Site; (2) historic

photographs, aerial photographs, and local histories; (3) California *Built Environment Resource Directory (BERD)* for Los Angeles County; and (4) SurveyLA for the Brentwood-Pacific Palisades Community Plan Area. All of the field data and research data were analyzed and evaluated by qualified professionals who meet the Secretary of the Interior's Professional Qualification Standards.

c) Project Design Features

No specific project design features (PDFs) 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 an historical resource as defined in Section 15064.5?*

(1) Impact Analysis

The Project would demolish the Barry Building and all those physical characteristics that convey its historical significance and that justify its designation as a City HCM, and its eligibility for listing in the California Register and the National Register. Thus, the Project would materially impair the significance of the Barry Building and would cause a substantial adverse change in the significance of an historical resource as defined by CEQA. Therefore, Project impacts related to historical resources would be significant.

(2) Mitigation Measures

The following measure shall be undertaken by the Project Applicant:

MM-CUL-1 Prior to the issuance of a demolition permit, the Barry Building shall be documented to meet Historic American Buildings Survey (HABS) Level I standards. The documentation shall include a full set of measured drawings depicting existing conditions; photographs with large format negatives of exterior and interior views; photocopies with large format negatives of select existing drawings and historic views that are produced in accordance with the U.S. Copyright Act (as amended); and a written history and description. The documentation shall be submitted to the Library of Congress, with copies given to the Los Angeles Conservancy and the Los Angeles Public Library. A digital copy of the documentation shall be submitted to the South Central Coastal Information Center at California State University, Fullerton.

(3) Level of Significance After Mitigation

Mitigation Measure MM-CUL-1, provided above, requires the Barry Building to be documented to meet HABS Level I standards prior to demolition. However, even after implementation of

Mitigation Measure MM-CUL-1, Project impacts would remain significant and unavoidable as the Project would demolish the existing historical resource.

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

As discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), there are no known archaeological resources at the Project Site, and the removal of the existing utilities (approximately two to five feet underground) would only disturb soils that have been previously disturbed by past development activities. Thus, it is unlikely that any unknown archaeological resources would be discovered during the removal of the existing utilities and Project impacts were determined to be less than significant. Therefore, no further analysis of this issue is required.

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

As discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), the likelihood of encountering human remains on the Project Site is minimal. Compliance with existing regulatory standards would ensure appropriate treatment of any potential human remains should they be discovered during demolition activities. Therefore, the Project's impacts on human remains would be less than significant, and no further analysis of this issue is required.

e) Cumulative Impacts

(1) Impact Analysis

(a) *Historical Resources*

Impacts with respect to historic resources tend to be site-specific, unless there are resources that may be interrelated across multiple sites. While the Project would demolish the Barry Building, resulting in a Project-specific significant and unavoidable impact, the Barry Building is not a contributor to any established historic district or HPOZ and does not contribute to the significance of any other individual historical resources. As shown in Table III-1 of Section III, Environmental Setting, of this Draft EIR, there are seven related projects within proximity to the Project Site, the closest of which is approximately 0.33 miles from the Project Site. The remaining related projects are at least 0.5 miles from the Project Site. With the exception of Related Project No. 3 (Brentwood School), none of the other related projects have been identified on SurveyLA. Related Project No. 3 is listed on SurveyLA for the Zukin Estate Tower, which is now part of the Brentwood School Campus. However, Related Project No. 3 only proposes to increase student enrollment and does not propose any physical alterations to the Brentwood School Campus. Therefore, it is not expected that Related Project No. 3 would result in any impacts with respect to historic resources.

Nevertheless, the degree to which the individual related projects could result in significant impacts to historical resources would be assessed by the City on a project-by-project basis. As stated previously, the Project and related projects do not share any historical resources in common and based on the distance between the Project Site and the related projects, there are no resources that would be impacted by both the Project and the related projects. Thus, even if the related projects would result in significant impacts to a historical resource, the Project would not contribute to this impact. Therefore, cumulative impacts to historical resources would be less than significant.

(2) Mitigation Measures

No significant cumulative impacts to historical resources have been identified, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to historical resources would be less than significant without mitigation.