

IV.A. Cultural Resources

1. INTRODUCTION

This section evaluates potential impacts on 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 (e.g., 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. This section is based on information provided in Appendix B of this Draft EIR, which includes: *Historic Resources Technical Report, Mirabel (5401-5425 Wilshire Boulevard), Historic Resources Group, March 2024*.

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:

- 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

(b) 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:

¹ 36 Code of Federal Regulations (CFR) 60.

² United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

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

- 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.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

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

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... 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

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

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.

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
- 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:

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.

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

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.

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

(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.

¹¹ United States Department of the Interior, National Park Service, Native American Graves Protection And Repatriation Act, 1990.

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

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 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

¹³ California Public Resources Code Section 21083.1(a).

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

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 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 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.”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;

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

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

¹⁷ California Public Resources Code, Section 5024.1[a].

¹⁸ California Public Resources Code, Section 5024.1[b].

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 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*

(1) *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)

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

(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.

The Project Site is located within the boundaries of the Wilshire Community Plan. Policies related to cultural resources from the Wilshire Community Plan are listed below.

Policy 1-3.2: Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.

Policy 1-3.3: Promote the preservation and rehabilitation of individual residential buildings of historic significance.

Policy 17-1.1: Encourage the preservation, maintenance, enhancement and reuse of existing historic buildings and the restoration of original facades.

Policy 17-2.1: Continue to identify and document Wilshire Community Plan Area Cultural and Historical Monuments.

Policy 17-3.1: Assist private owners of historic resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.

(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, city, or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of with 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.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 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

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

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 Zone (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 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

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.

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 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 indicate 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) Description of the Project Site

The Project Site contains two buildings fronting Wilshire Boulevard and a surface parking lot immediately north of the two buildings. The Site originally contained four separate buildings constructed in the mid- to late-1930s. In 1991, three of the properties (5405-5411, 5413-5415 and 5421-5425 Wilshire Boulevard) were combined into a single building. The existing two buildings are currently unoccupied but were most recently occupied by Wilshire Beauty (5401 Wilshire Boulevard) and Staples (5407 Wilshire Boulevard).

(a) *5401 Wilshire Boulevard*

5401 Wilshire Boulevard is located at the northwest corner of the intersection of Wilshire Boulevard and South Cloverdale Avenue. The property contains a one-story plus a mezzanine, Streamline Moderne-style commercial building originally constructed in 1936. The building is set

flush to the sidewalk on the south and east. It is flanked to the north by a surface parking lot, and to the west by an adjacent commercial building. It has a rectangular plan and is of board-formed, cast-in-place concrete and steel frame construction, with a bow truss roof clad in built-up roofing. The exterior walls of the south and east façades are finished with cement plaster; the north façade is of painted, exposed board-formed concrete. There is a one-story, flat-roofed addition of brick construction at the northeast corner.

The south (primary) façade is asymmetrically composed and consists of a continuous band of metal-framed glazed storefront at street level topped by a continuous, projecting plaster band. Above the band, the wall surface is composed of overlapping planes and volumes of smooth plaster with rounded corners and continuous cornices with geometrically patterned bands, facets, and fluting. The projecting central volume is supported on squat half-columns with horizontal fluting. A flat wall panel with stepped channeling and a square spire rise above the roof parapet just north of the rounded corner. The primary entrance is asymmetrically located at the corner and consists of a pair of frameless glass doors with metal pulls, sidelights, and transom light. The storefront, banding, smooth plaster wall surfaces, and cornices continue onto the simpler east (secondary) façade.

The interior has been completely altered and consists primarily of ceramic tile flooring, plaster walls, painted steel pipe columns, and suspended acoustical tile ceilings.

(b) *5407 Wilshire Boulevard*

5407 Wilshire Boulevard is located at the northeast corner of the intersection of Wilshire Boulevard and South Cochran Avenue. The property contains a one-story commercial building designed in a neo-Streamline Moderne style. The building is set back from the sidewalk with raised concrete planters on the south, flush to the sidewalk on the west, flanked to the east by an adjacent commercial building and to the north by a surface parking lot. The building has a rectangular plan and was originally three separate structures, constructed in the mid- to late 1930s. In 1991, the three separate buildings (5405-5411, 5413-5415, and 5421-5425 Wilshire Boulevard) were merged into one structure (5407 Wilshire Boulevard). The demising walls were removed, and the interiors were opened to create a single large retail space. The original south (primary) facades along Wilshire Boulevard were substantially altered to create a uniform appearance. The building was most recently occupied by a Staples office supply store, which closed at the end of 2021.

The building is of board-formed cast-in-place concrete, brick masonry, and steel frame construction, with wood bow-truss roof systems. The exterior walls are finished with cement plaster and the roofs are clad in built-up roofing. Only two of the buildings (5405-5411 and 5413-5415 Wilshire Boulevard) originally had full bow-truss roof systems which remain but have been seismically upgraded. The roof was partially modified at 5421-5425 Wilshire Boulevard to create a full bow-truss roof and unify the interior space.

The south (primary) façade is asymmetrically composed. A forensic reading of the façade reveals three sections corresponding to the three original buildings. The east section retains elements of the original building façade constructed in 1936 (5405-5411 Wilshire Boulevard), primarily a continuous cantilevered canopy with a channeled fascia topped by a channeled frieze with a geometrically patterned cornice. The frieze terminates at each end in a polygonal spire with horizontal banding. The ground-floor storefronts were filled and three projecting display windows with channeled lintels and hoods extending above the canopy were added.

The central section of the façade corresponds with the original building at 5413-5415 Wilshire Boulevard which was constructed in 1934 as the Great Atlantic & Pacific Tea Company “Food Palace” market. The ground-floor opening has been filled and is now a blank plaster wall. This portion of the Staples building retains the original continuous cantilevered canopy with a channeled fascia, stepped plaster tower with blade sign, horizontal banding rising above the east end of the canopy, and a pilaster capped with horizontal fluting.

The west portion of the façade does not retain any elements of the building facades and storefronts original to the location (5421-5425 Wilshire Boulevard). Instead, the canopy and channeled fascia of the central section continue west and wrap the corner above a semicircular glazed bow with horizontal muntins. The curved, battered wall above the canopy is topped with horizontal fluting and a shallow dome. A glazed metal door with sidelights is accessed by concrete steps with metal pipe handrails.

The west façade has three square display windows within a band of horizontal channels in the plaster, and two large rectangular recesses. Hollow metal exit doors are located on the north and south façades. The primary entrance is located on the north façade, facing the parking lot, and consists of a recessed rectangular opening with glazed metal storefront and automatic sliding doors. The interiors have been completely altered and consist primarily of concrete floors, exposed steel framing and board-formed concrete walls, and exposed bow-truss roof systems.

(2) Development History of 5401 and 5407 Wilshire Boulevard

5401 and 5407 Wilshire Boulevard are located on the north side of Wilshire Boulevard between Cochran and Cloverdale Avenues. As mentioned above, the Site was originally four separate buildings constructed in the mid- to late-1930s as the Miracle Mile area of Wilshire Boulevard was developing into a commercial thoroughfare. In the early 1990s, three of the properties (5405-5411, 5413-5415 and 5421-5425 Wilshire Boulevard) were combined and there are now two buildings on the site that were previously occupied by Wilshire Beauty (5401 Wilshire Boulevard) and Staples (5407 Wilshire Boulevard).

(a) *5401 Wilshire Boulevard*

This building is located at 5401-5403 Wilshire Boulevard on the northwest corner of Cloverdale Avenue and Wilshire Boulevard. It was designed by the architectural firm Norstrom & Anderson, for retired food canner F.B. Neuhoff.

Completed in 1936, the Streamline Moderne building was originally constructed as the Miracle Mile branch of Sontag Original Cut-Rate Drug Stores which occupied the building for approximately 10 years. The Sontag Cut-Rate Drug Company opened its first Southern California drug store in 1929. By the early 1930s, the company operated several stores throughout the Los Angeles area. The company's focus on discounted prices helped it to thrive during the Great Depression.

Sontag's expanded rapidly and was operating over 30 retail stores in California by 1935. They continued to grow and added food and soda fountains to their offerings in select new locations. The store at 5401 Wilshire was conceived as one of the company's flagship locations, advertising a "complete fountain grill that could seat one hundred people and an interior with controlled temperature." The building's distinctive Streamline Moderne architectural style was a striking addition to the fashionable Miracle Mile shopping district.

They advertised a "complete fountain grill that could seat one hundred people and an interior with controlled temperature." The Sontag Cut-Rate Drug Company flourished throughout the late 1930s and early '40s, operating over 40 stores in California. The company was acquired by United Drug, Inc. of Boston in 1944, resulting in the consolidation of locations and the eventual closure of several stores including the Wilshire Boulevard location.

In 1946, the building was converted into three storefronts which housed a variety of retail establishments including several appliance stores and a delicatessen. In 1947, a one-story addition was constructed to the north along Cloverdale Avenue. The building was eventually consolidated back into a single storefront. It is vacant at the time of this report, with Wilshire Beauty being its last retail tenant.

(b) 5407 Wilshire Boulevard

The building at 5407 Wilshire Boulevard was historically three separate buildings with three separate addresses: 5405-5411, 5413-5415, and 5421-5425 Wilshire Boulevard. In 1991, an extensive renovation combined the three buildings into a single structure.

(i) 5405-5411 Wilshire

This one-story Streamline Moderne commercial building at 5405-5411 Wilshire Boulevard was located west of the Sontag Original Cut-Rate Drug Store. Constructed in 1936, it was designed by architect Marcus P. Miller for the Santa Inez Company of San Francisco. The building originally had four storefronts, and a wide variety of tenants occupied the building throughout its history. In 1991, all storefronts were filled, and three projecting display windows were added. The original decorative cornice was retained. The building represents the eastern portion of the former Staples office supply store.

(ii) *5413-5415 Wilshire*

This one-story Streamline Moderne commercial building at 5413-5415 Wilshire Boulevard was constructed in 1934. It was designed by the architectural firm Norstrom & Anderson for real estate developer E. Clem Wilson. The building was occupied by the Great Atlantic & Pacific Tea Company (often referred to as A&P) “Food Palace” in March of 1935. The reinforced concrete structure cost \$35,000 to build and featured eighty-foot arched trusses. When the “Food Palace” opened for business, it “advertised an adjoining parking lot for five hundred cars,” an important detail in 1930s Los Angeles, which was rapidly becoming an automobile-centric city. A&P expanded to the West Coast in 1930 and opened nine stores in Los Angeles. By 1935, there were over 100 A&P stores in the Los Angeles area. The “Food Palace” building later housed several markets, including Clover Mart, Ralphs, and Roman Foods.

As part of the 1991 single-building consolidation, the ground-floor storefront was filled to create a solid wall. Original features that were retained include a flat cornice with linear accents, a stepped tower, and banded canopy. This building now comprises the center portion of the former Staples office supply store.

(iii) *5421-5425 Wilshire*

5421-5425 Wilshire Boulevard, on the northeast corner of Wilshire Boulevard and Cochran Avenue, was constructed in 1938 and designed by architects Norstrom & Anderson for the E. Clem Wilson Company. It consisted of two storefronts which were

Distinguished by different architectural styles. The cross-gabled storefront at the corner housed a variety of small restaurants including Wimpy Grills and the Flying Saucer. The second storefront, designed in a French Eclectic style with a steep hipped roof, originally contained two storefronts and housed several retail establishments, including a 1939 floral shop owned by actress and singer Judy Garland, before becoming Brown’s Wilshire Bakery in 1947. These storefronts were demolished in 1990 and replaced with the curving façade and saucer-shaped roof seen today. The new construction took cues from the Streamline Moderne style of the neighboring buildings and blended the linear details in the cornice and continued the banded canopy from 5413-5415 Wilshire Boulevard.

(c) *Alterations to 5401 and 5407 Wilshire Boulevard*

The buildings located on the Project Site have been subject to alteration. Alterations to both buildings are detailed below.

(i) *5401 Wilshire Boulevard*

The exterior of 5401 Wilshire Boulevard has undergone some alterations. The storefront systems and entrance doors have all been replaced, and the decorative triple fillet moldings on the entrance canopy have been removed, but the exterior otherwise remains substantially intact. A

one-story brick masonry addition at the rear was constructed in 1947. The building's interior has been subject to substantial alteration over time and only remnant original features remain.

(ii) 5407 Wilshire Boulevard

The exterior of 5407 Wilshire Boulevard has undergone extensive alterations, most recently in 1991 when the original three buildings were combined to create one large retail building. All the demising walls between the buildings were removed to create one open interior space and the bow-truss roofs were exposed. The 1991 renovation retained some original exterior design features and combined these with new construction to create a unified street-facing façade so that the three original buildings would appear and function as a single building.

The west portion of the building that housed the Flying Saucer Restaurant and Brown's Wilshire Bakery (constructed in 1938) was partially demolished and a large domed addition was constructed in a neo-Streamline Moderne style. The front 35-40 feet of the storefronts were demolished including the cross-gable roof of the restaurant and steep hipped roof of the bakery. The original bow-truss roof in the rear of the building was repaired and seismically upgraded, parapets were repaired, and new roofing material applied. The domed addition at the west end, which replaced original Period Revival storefronts, was designed in a neo-Streamline Moderne style to anchor the building at the corner and blend with the two storefronts to the east. The cantilevered canopy with channeled fascia at the center portion was extended to the new addition to the west, and the new signage atop the canopy was extended across both facades. The stepped plaster tower and flat cornice of the center section were repaired and restored. The upper banding in the cornice was also carried west to the new addition. The original blade sign on the tower was replicated for the new tenant.

Three projecting display windows were added to the east portion of the building. The channeled detail from the cantilevered canopy was extended to the upper portion of the windows in an attempt to create a unifying design element. The channeled and patterned cornice was repaired and restored.

The original storefronts and ceramic tile base of the east and central portions (built in 1934 and 1936) were removed and the openings along the Wilshire frontage were filled. Hollow metal exit doors, concrete stairs, and raised planters were added to the façades of both buildings. The original bow-truss roof systems were repaired and seismically upgraded, parapets were repaired, and new roofing material applied.

The north (rear) façade openings (doors and windows) were removed from all the buildings and in-filled to create space for trade graphics, a large customer entry, and a roll-up gate for deliveries to accommodate a large retail tenant.

(3) Description of Surrounding Area

The Project Site is in the Mid-Wilshire community of central Los Angeles approximately six-and-a-half miles west of downtown, along a segment of Wilshire Boulevard known as the Miracle Mile. The Mid-Wilshire neighborhood is generally considered to be bounded by Crenshaw Boulevard, Pico Boulevard, Fairfax Avenue, and Wilshire Boulevard. Punctuated by commercial development along Olympic Boulevard, San Vicente Boulevard, Pico Boulevard, and Wilshire Boulevard (including part of Miracle Mile), the surrounding neighborhoods are dominated by subdivisions of single- and multi-family residences from the 1920s to the 1940s. Several of these neighborhoods have been designated local Historic Preservation Overlay Zones (HPOZ) by the City.

Mid-Wilshire is defined by a hierarchical street grid of distinct commercial corridors traversing residential neighborhoods, institutional campuses such as the Los Angeles County Museum of Art (LACMA) and the La Brea Tar Pits & Museum, the superblockgarden apartment complex of Park La Brea, and designed landscapes such as Pan Pacific Park. Smaller private museums such as the Craft Contemporary Museum and the Petersen Automotive Museum in addition to the soon-to-be-completed Academy Museum of Motion Pictures, in the May Company department store building (completed in 1939), round out the City's museum row along Wilshire Boulevard.

The Project Site is located on the north side of Wilshire Boulevard between Cochran and Cloverdale Avenues in the Miracle Mile commercial district between Fairfax Avenue to the west and La Brea Avenue to the east. The property is surrounded by low- to mid- and high-rise commercial development along Wilshire Boulevard and flanked by a multi-family residential neighborhood to the north. The commercial district is a mix of Art Deco and Streamline Moderne architecture from the 1920s and 1930s alongside glassy high-rises from the 1960s to the present.

(4) History of the Surrounding Area

(a) *Wilshire Boulevard*

Wilshire Boulevard was once a migration route for prehistoric mammoths and a dirt path for Spanish rancheros before becoming a modern thoroughfare. Ranchers grazed cattle and sheep in open pastures, and farmers grew crops like barley and wheat. While the City expanded rapidly from the east and beachfront communities like Santa Monica grew in the west, the space in between remained rural. It was not until the land speculation boom of the 1880s that the first seeds of development in the Wilshire area were planted. The first visionary was Henry Gaylord Wilshire, a charismatic entrepreneur from Ohio who with his brother William purchased 35 acres at the western edge of Los Angeles in 1887 and subdivided the land in 1895. The Wilshire brothers envisioned a luxurious subdivision designed for Los Angeles' wealthy, anchored by a wide, graveled boulevard.

Wilshire Boulevard first appeared on maps in 1895 when Henry Gaylord Wilshire cleared a 400-yard strip of land in his barley field. Only later, when others took over the enterprise and

automobiles arrived in Los Angeles, did Wilshire Boulevard expand. By the mid-1920s, Wilshire Boulevard was one of the most heavily traveled streets in Los Angeles, serving as the most direct east-west route through the City.

As Los Angeles evolved into a rapidly-growing twentieth-century metropolis, Wilshire Boulevard developed with commercial and institutional uses, later referred to as “the first linear downtown. Churches, department stores, and other institutions moved to Wilshire Boulevard from downtown Los Angeles, determined to “stake their future on Los Angeles’ increasing growth away from the city center. The success of Wilshire Boulevard as a commercial corridor depended largely on the automobile, and its new buildings reflected this emphasis. Some buildings, like Bullock’s Wilshire department store, asserted their presence with tall vertical elements. Others relied on long, horizontal volumes, sometimes occupying a full block, with projecting signs, large display windows, and other attention-getting elements incorporated for easy visibility from an automobile. New buildings also employed the latest architectural styles like Art Deco, Zigzag Moderne, and Streamline Moderne, as well as popular Period Revival styles. Drive-in restaurants and cafés also catered to the automobile owner, and many of the boulevard’s new buildings featured rear or side parking lots.

After steady growth through the 1930s Wilshire Boulevard saw little commercial development during World War II. In the postwar years, however, Wilshire Boulevard’s department stores, hotels, theaters and restaurants were joined by large office buildings housing high-profile corporations. Wilshire Boulevard quickly gained a new reputation as a premier location for corporate headquarters. The 1957 lifting of the city’s 150-foot height limit restriction led to towering skyscrapers, bringing a fundamental change to the landscape. The postwar period saw a shift in the area’s architectural identity, with many commercial and institutional buildings exhibiting sleek Modern styles.

Wilshire Boulevard’s reputation as a premier business address continued through the 1970s, with dozens of new high-rise corporate buildings distributed over several miles. Commercial activity waned in the 1980s, as major retailers and corporations departed the area for the cheaper and less congested San Fernando Valley and Westside of Los Angeles. Wilshire Boulevard experienced periods of economic downturn in the 1980s and 1990s but remains a strong and diverse commercial center in Los Angeles.

(b) *Miracle Mile*

The history of the Miracle Mile segment of Wilshire Boulevard, which rose to prominence as automobiles became the preferred mode of transportation during the 1920s and 30s, dates to before the advent of the automobile. A dirt road flanked by oil wells and barley fields, few people at the turn of the twentieth century predicted the development of the western reaches of Wilshire Boulevard. One of the few early non-agricultural occupants of the Mid-Wilshire area was the Page Military Academy, which relocated from its original West Adams location to the intersection of San

Vincente Boulevard and Cochran Avenue in 1915. The new location was chosen partially because of its remoteness from more urbanized Los Angeles and Santa Monica.

Los Angeles real estate developer A.W. Ross foresaw the inevitable westward expansion of Los Angeles far earlier than most. In 1921, Ross began buying up land along Wilshire Boulevard between La Brea Avenue and Fairfax Avenue, a pursuit some referred to as “Ross’s Folly.” He envisioned a destination shopping district that would lure customers from downtown Los Angeles and rival the outlying commercial districts then forming in Hollywood and Beverly Hills. Ross’s Wilshire Boulevard development encouraged architecturally distinctive commercial buildings as a distinguishing feature. He foresaw how increasing personal automobile ownership would change settlement patterns and challenge the traditional dominance of a centralized downtown.

Ross’s development gamble along the western segments of Wilshire Boulevard eventually paid off as “Ross’s Folly” became better known as the “Miracle Mile” by the 1930s. The Miracle Mile attracted large retailers like Desmond’s, Silverwoods, and the May Company, and even supermarkets like Ralph’s boasted flashy architecture on a grand scale. Dominated by Art Deco and Streamline Moderne structures, the buildings were designed to provide easy and convenient access for the automobile shopper. Large display windows were installed in order to make merchandise visible from the street. Prominent towers were often incorporated into the design to attract the attention of passing motorists. Large parking lots were incorporated at the property’s rear, where a second “main entrance” provided convenient access from the parking lot.

After World War II, the Miracle Mile continued to be successful but was eventually overcome by the same forces of change that once made it a success. Increasing reliance on the personal automobile, the development of the freeway system and the post-War population boom ushered in the age of suburban shopping malls, which challenged older, automobile-oriented retail districts like the Miracle Mile just as the Miracle Mile had previously challenged the pedestrian-oriented retail districts downtown. Chasing their customer base, retailers once at the vanguard of the City’s decentralization relocated, leaving vacant storefronts and discount stores in their place.

The Miracle Mile witnessed a major influx of new institutional buildings, most visibly in a new museum district near the intersection of Wilshire Boulevard and Fairfax Avenue that injected new life into the commercial district. The La Brea Tar Pits had been open to the public since the 1920s, but it was not until the 1965 completion of LACMA that the Miracle Mile gained its second identity as an institutional center.

(5) Current Determinations and Previous Evaluations (Project Site)

(a) *Miracle Mile Historic District*

The two buildings located on the Project Site, 5401 Wilshire Boulevard and 5407 Wilshire Boulevard, were evaluated in 1983 as part of a Historic Resources Determination of Eligibility for a proposed Los Angeles Rail Rapid Transit Project. As a result of that survey, a National Register-eligible historic district, the “Miracle Mile Historic District,” was identified. The Miracle Mile Historic

District is located between 5320 and 5519 Wilshire Boulevard, on both sides of Wilshire Boulevard between La Brea Avenue and Burnside Avenue. It was originally composed of Period Revival, Art Deco and Streamline Moderne commercial buildings constructed in the 1920s and 1930s. Nineteen (19) buildings were identified as contributors to the District.

The Miracle Mile Historic District was determined eligible under National Register Criterion A representing the development of Los Angeles as an expanding city in the 1920s and 1930s, and under National Register Criterion C as one of the best collections of Art Deco and Streamline Moderne commercial architecture in Los Angeles.

At the time of the 1983 evaluation, the Project Site contained four separate commercial buildings (5401-5403, 5405-5411, 5413-5415, and 5421-5425 Wilshire Boulevard). Each was identified as a contributor to the Miracle Mile Historic District. Since that time, 5405-5411, 5413-5415, and 5421-5425 Wilshire Boulevard were merged into a single structure (5407 Wilshire Boulevard) and the south (primary) facades along Wilshire Boulevard were altered to create a uniform appearance. 5401 Wilshire Boulevard (identified as 5401-5403 in 1983) has largely remained unaltered.

The Miracle Mile Historic District was formally determined eligible for listing in the National Register of Historic Places by the National Park Service. As a result of the formal determination of eligibility, contributors to the District are listed in the California Historic Resources Inventory (HRI) with a California Historical Resources Status Code of 2D2.49 Status code 2D2 is defined as a “contributor to a district determined eligible for the National Register by consensus through the Section 106 process. Listed in the California Register.” See Appendix G of the Historic Resources Report included in Appendix B to this Draft EIR for the 1983 Determination of Eligibility for the Miracle Mile Historic District, which includes a description of the district, significance statement, and map of contributing and non-contributing buildings.

Because the Miracle Mile Historic District was found eligible for listing in the National Register and is listed in the California Register with a Status Code of 2D2 it was not re-surveyed as part of SurveyLA.

(b) *5401-5405 Wilshire Boulevard (Sontag Drug Building)*

An Historic-Cultural Monument (HCM) application for the former Sontag Drug Building at 5401-5405 Wilshire Boulevard was submitted to the Department of City Planning’s Office of Historic Resources on December 11, 2020. The HCM application was determined complete by the Director of Planning on January 12, 2021, and subsequently reviewed by the Cultural Heritage Commission in a public meeting on February 4, 2021. The Cultural Heritage Commission determined that the proposed designation did merit consideration and further review. However, because the HCM application was received after the deemed complete date of the Project, pursuant to Government Code Section 65913.10(a), the Office of Historic Resources terminated the HCM application.

As noted above, the 5401-5405 Wilshire Boulevard was previously listed in the California Register as a contributor to the Miracle Mile Historic District. It is also evaluated for listing as an individual historic resource later in this section for the purposes of CEQA.

(6) Current Determinations and Previous Evaluations (Potential Impact Area)

As noted above, the Project Site is located within the boundary of the Miracle Mile Historic District. There are several contributors to the District located in the Potential Impact Area. Some individual buildings within the District have also been designated as Los Angeles HCMs. A City of Los Angeles Historic Preservation Overlay Zone (HPOZ), the Miracle Mile HPOZ, is located south of the Project Site. None of the buildings on the Project Site are located within the boundaries of the Miracle Mile HPOZ. The Project Site is also located in the Wilshire Community Plan Area (CPA) of Los Angeles, which was surveyed by SurveyLA in 2015. SurveyLA identified two buildings on Wilshire Boulevard as individually eligible for historic designation and one historic district immediately north of the Project Site. These resources are discussed below and listed in Table IV.A-1.

(7) Contributors to the Miracle Mile Historic District in the Potential Impact Area

(a) *5363-5379 Wilshire Boulevard*

This two-story commercial building with a three-story octagonal tower on the northeast corner of Wilshire Boulevard and Cloverdale Avenue was originally constructed in 1928. It was remodeled in 1936 in a Streamline Modern style. It is located to the east of the Project Site across Cloverdale Avenue. The wood frame and brick building has cement plaster cladding and flat roofs. The retail shops on the ground floor all have replacement aluminum storefront systems. The second story has a band of recessed steel sash windows with an upper divided-light window separated by scored plaster piers. The entrance to the building on Wilshire Boulevard has a rounded canopy with channeled fascia. The tower has three divided-light steel sash windows and vertical reeded plaster ornamentation.

This building was identified as a contributor to the Miracle Mile Historic District and is listed in the California Register.

(b) *5366-5374 Wilshire Boulevard*

This two-story commercial building on the south side of Wilshire Boulevard, one parcel east of Cloverdale Avenue, was originally constructed in 1926. It was remodeled in 1938 and designed in a Streamline Modern style. It is located to the southeast of the Project Site across Wilshire Boulevard. The wood frame and brick building has cement plaster cladding and a flat roof. The building originally had four storefronts with apartments on the second floor. In 1938 a camera store at 5370 Wilshire Boulevard, "The Darkroom," remodeled the storefront to resemble a camera. It was designed by architect Marcus P. Miller. Its black vitrolite glass façade is a notable

example of programmatic architecture in Los Angeles. The other storefronts have been altered and the second floor has an added metal screen.

This building is listed in the California Register as a contributor to the Miracle Mile Historic District. The façade of the building, including the storefront in the shape of a camera was designated Historic-Cultural Monument No. 451 in August 1989.

(c) *5410 Wilshire Boulevard*

This ten-story Art Deco commercial building, referred to as the “Dominguez-Wilshire Building,” was constructed in 1930 and occupies the entire block between Cloverdale and Cochran Avenues on the south side of Wilshire Boulevard. It is located directly south across Wilshire Boulevard from the Project Site. Designed by the celebrated architectural firm of Morgan Walls & Clements, the building has a two-story retail block supporting a ten-story office tower. The retail block is divided vertically by stepped pilasters and has rounded corners. The vertically articulated tower recedes in setbacks to a pyramidal roof. The building is embellished with Zigzag decorative motifs and has the main automobile entrance from the rear surface parking lot. The building was rehabilitated in 2000.

This building is listed in the California Register as a contributor to the Miracle Mile Historic District.

**Table IV.A-1
Previously Identified Historical Resources**

Address	APN#	Date	Name	Historic Resource Status
Wilshire Blvd. between La Brea Ave. and Burnside Ave.	Various	1928-1938	Miracle Mile Historic District	Formally determined eligible for listing in the National Register and listed in the California Register.
Bounded by San Vicente Blvd. to the south, La Brea Ave. to the east, Orange Grove Ave. to the west and Wilshire Blvd. to the north.	Various	1921-1953	Miracle Mile HPOZ	City of Los Angeles HPOZ.
Parcels located along S. Ridgeley Dr., S. Burnside Ave. and S. Dunsmuir Ave., between West 6th St. and Wilshire Blvd.; and Cochran Ave., Cloverdale Ave. and Detroit St., between West 3rd St. and Wilshire Blvd.	Various	1920-1952	Ridgeley Drive – Detroit Street Multi-Family Residential Historic District	Identified as eligible for listing in the National Register, California Register and as a Los Angeles HPOZ by SurveyLA.
5366-5374 Wilshire Blvd.	5089-002-025	1935	“The Dark Room Camera Store” 2-story commercial building with a Mimetic storefront depicting a camera.	HCM No. 451 (façade only) and a contributor to the Miracle Mile Historic District

**Table IV.A-1
Previously Identified Historical Resources**

Address	APN#	Date	Name	Historic Resource Status
5455 Wilshire Blvd.	5508010 02 5	1960	22-story Corporate International office building.	Identified as individually eligible for listing in the National Register, California Register and as a Los Angeles HCM by SurveyLA.
5466-5470 Wilshire Blvd.	5089- 003- 021	1928	2-and 4-story Spanish Revival commercial building	Found individually eligible for CR and local listing by Survey LA. (Also, contributor to the Miracle Mile Historic District.)
5500 -5522 Wilshire Blvd.	5089- 004- 016	1929	Wilshire Tower	HCM No. 332 (Also contributor to the Miracle Mile Historic District.)
5515-5519 Wilshire Blvd.	5508- 011- 026	1936	El Rey Theater	HCM No. 520 (Also contributor to the Miracle Mile Historic District.)
Source: Historic Resources Group, 2023. Refer to Appendix B of this Draft EIR.				

(d) *5450 Wilshire Boulevard*

This one-story commercial building on the southwest corner of Wilshire Boulevard and Cochran Ave was originally constructed in 1936 and designed in the Streamline Moderne style by architectural firm Morgan Walls & Clements. It is located to the southwest of the Project Site across Wilshire Boulevard. The reinforced concrete building has cement plaster cladding and a flat roof. Used primarily for a single retail tenant, the storefront has large picture windows.

This building is listed in the California Register as a contributor to the Miracle Mile Historic District.

(8) Other Identified Resources in the Potential Impact Area

(a) *5455 Wilshire Boulevard*

This 22-story Corporate International style commercial office building is located immediately west of the Project Site on the northwest corner of Wilshire Boulevard and Cochran Avenue. The building was constructed in 1960 and designed by Los Angeles architects W. Douglas and D. Everett Lee. Rectangular in plan, the building consists of a steel-frame office tower rising above a podium parking structure. The tower features an extruded metal frame curtain wall of glass windows and spandrel panels arranged in alternating horizontal bands. The podium parking is

screened by vertical metal louvers. The slightly recessed ground floor is clad in marble and features a deeply recessed main entry from Wilshire Boulevard.

In 2015, 5455 Wilshire Boulevard was found eligible for listing in the National Register, California Register and for local listing by SurveyLA as an “excellent example of a Corporate International office building on Wilshire’s Miracle Mile, designed by notable local architects W. Douglas and D. Everett Lee.”

(b) *5466-5470 Wilshire Boulevard*

This 2- and 4-story Spanish Colonial Revival commercial building is located on the southeast corner of Wilshire Boulevard and Dunsmuir Avenue. It was constructed 1928 by A.W. Ross who spearheaded the original development of the Miracle Mile as a commercial district. The building is L-shaped in plan and consists of a 4-story volume at the corner of Wilshire Boulevard and Dunsmuir Avenue with a 2-story volume continuing east on Wilshire Boulevard. The combination flat and hipped roof is partially clad in red clay tiles; wall cladding is smooth cement plaster. Storefronts line the ground floor along Wilshire Boulevard with offices on the upper floors. Windows on the upper floors are replacement metal frame within punched rectangular openings. Decorative terra cotta spandrel panels delineate the cornice line and fourth floors.

5466-5470 Wilshire Boulevard is listed in the California Register as a contributor to the Miracle Mile Historic District. The building was also found eligible for listing in the California Register and for local listing by SurveyLA as “the location of developer A.W. Ross’ office during the height of development on Wilshire’s Miracle Mile in the late 1920s-early 1930s.”

(c) *5500-5522 Wilshire Boulevard*

This Art Deco retail/commercial office building, referred to as the “Wilshire Tower,” is located on the south side of Wilshire Boulevard where it spans the entire block between Dunsmuir Avenue and Burnside Avenue. The building was designed by noted architect Gilbert Stanley Underwood and constructed in 1929. It consists of a two-story base housing commercial retail space with a central office tower rising an additional eight stories. The design combines elements of Zigzag and Streamline Moderne.

Wilshire Tower is considered the first Art Deco landmark tower built on the Miracle Mile and set the standard for future development. The ground floor retail spaces were originally occupied by Los Angeles retailers Desmond’s and Silverwoods. It was designated Los Angeles Historic-Cultural Monument No. 332 in 1987. It is also listed in the California Register as a contributing building to the Miracle Mile Historic District.

(d) *5515-5519 Wilshire Boulevard*

Originally constructed as a movie theater in 1936, the El Rey Theatre is located on the north side of Wilshire Boulevard mid-block between Dunsmuir Avenue and Burnside Avenue. The theater

was designed by noted theater designer Clifford A. Balch in an exuberant Art Deco style featuring scored and fluted plaster surfaces, decorative terra cotta courses and panels, stepped horizontal fins, and neon-edged projecting marquee and blade sign.

The El Rey Theatre was designated Los Angeles Historic-Cultural Monument No. 520 in 1991 and is also listed in the California Register as a contributor to the Miracle Mile Historic District.

(e) *Ridgeley Drive-Detroit Street Multi-Family Residential Historic District*

Located north of the Project Site, the Ridgeley Drive-Detroit Street Multi-Family Residential Historic District was identified through SurveyLA in 2015. The Ridgeley Drive-Detroit Street Multi-Family Residential Historic District is composed of single and multi-family historic homes built during the period of 1920 to 1952. The residential district is situated within the Mid-Wilshire neighborhood of central Los Angeles, just north of the Miracle Mile commercial and institutional corridor along Wilshire Boulevard and southeast of the historic Park La Brea development. District parcels are located along South Ridgeley Drive, South Burnside Avenue and South Dunsmuir Avenue, between West 6th Street and Wilshire Boulevard; and South Cochran Avenue, South Cloverdale Avenue and South Detroit Street, between West 3rd Street and Wilshire Boulevard.

The area was initially subdivided in the 1920s by G. Allan Hancock, son of Henry Hancock who first acquired Rancho La Brea in 1863. Developed as a single tract, the neighborhood is laid out across a flat rectilinear grid with uniform setbacks, detached garages, driveways with cut curbs, and one to five-story residences. Many of the district's historic residences retain character-defining features, original plans, massing, and scale while comprised primarily of Period Revival architecture. Residences range in architectural style from Spanish Colonial Revival, Mediterranean Revival, Tudor Revival, French Revival and Late Chateausque. Additionally, there are several compatible Minimal Traditional and Mid-Century Modern-style residences. Of the 214 total properties, 192 are contributors and 22 are non-contributors (many of which are large apartment buildings constructed in the late 1980s and early 1990s). Twelve multi-family residences within the district are also designated as Los Angeles HCMs.

The Ridgeley Drive-Detroit Street Multi-Family Residential Historic District is also significant as an early Jewish neighborhood, reflecting the community's movement west from areas such as Boyle Heights and South Los Angeles following World War II. Early Jewish residents were of Russian, Lithuanian, German, Austrian and Polish descent, some of whom listed Yiddish or Hebrew as their primary language. Many of the properties in the district were built and owned by Jewish individuals, indicating that early restrictive racial covenants may not have targeted Jewish families in the area. The district predates many other Jewish enclaves in the Wilshire area and remains a vibrant Jewish community today.

(f) *Miracle Mile HPOZ*

The Miracle Mile HPOZ was established in 2017. The HPOZ is bounded by San Vicente Boulevard to the south, La Brea Avenue to the east, Orange Grove Avenue to the west and

Wilshire Boulevard to the north. The HPOZ is composed of one-story single-family residences, and one- and two-story multi-family residences properties immediately south of the segment of Wilshire Boulevard known as Miracle Mile. The majority of contributing buildings were constructed in the 1920s, '30s, '40s and early 1950s. The Period of Significance for the HPOZ is 1921-1953 and architectural styles largely reflect Period Revival styles popular during the years before and immediately after World War II. As noted in the preservation plan for the HPOZ, the district is “characterized by the consistency of building styles and massing, as well as its spatial and landscape features such as concrete sidewalks, mature trees, relatively consistent lot sizes, uniform setbacks, and a skewed orthogonal street pattern.”

(9) Historical Resource Evaluations

Buildings located on the Project Site are reevaluated in this section for their eligibility for listing as historic resources. These re-evaluations are organized in this section as follows:

(a) *Integrity Evaluation of 5407 Wilshire Boulevard for Eligibility as a Contributor to the Miracle Mile Historic District*

As noted above, the Project Site is located within the boundary of the California Register-listed Miracle Mile Historic District which was first evaluated as a historic district in 1983. At the time of the 1983 determination, the Project Site contained four separate commercial buildings which were all identified as contributors to the Miracle Mile Historic District. None of the buildings were previously identified as eligible for historic listing individually. In 1991, three of the four contributing buildings were merged into a single, unified structure (5407 Wilshire Boulevard). Examination of 5407 Wilshire Boulevard as part of the Historic Resources Report has revealed substantial integrity issues as a result of the unification of the three buildings. 5407 Wilshire Boulevard is therefore re-evaluated in this section for its eligibility for listing as a contributor to the Miracle Mile Historic District. Because the three original buildings have now been combined into a single unified building, 5407 Wilshire Boulevard is not evaluated for individual eligibility.

(b) *Evaluation of the Sontag Drug Building for Eligibility as an Individual Resource and as a Contributor to the Miracle Mile Historic District*

The Sontag Drug Building at 5401 Wilshire Boulevard, also identified as a contributor to the Miracle Mile Historic District, has largely remained unaltered on its exterior. The Project would preserve the east and south facades of the Sontag Drug Building while removing the remainder of the building to allow for construction of subterranean parking. A one-story building that incorporates the original east and south façades will replace the removed portions of the Sontag Drug Building.

Out of an abundance of caution and to fully recognize the potential impacts to historical resources as a result of the proposed façade preservation and new construction, the Sontag Drug Building is evaluated in this section for historic significance as an *individual* resource in addition to its

current status as a contributor to the Miracle Mile Historic District. Evaluation of the Sontag Drug Building as an individual resource uses contexts and themes from the Los Angeles Citywide Context Statement (HCS) applicable to the Sontag Drug Building.

(c) *Integrity Evaluation of Contributing Buildings to the Miracle Mile Historic District*

In the intervening years since the 1983 evaluation of the Miracle Mile Historic District, several buildings identified as contributors have been demolished and other contributing buildings have been altered. In order to better understand potential impacts to the entire district, this section also reviews the *integrity* of the remaining contributors to the Miracle Mile Historic District located outside the Project Site. Regardless, the eligibility of the Miracle Mile Historic District for listing in the California Register is accepted for the purposes of this analysis and it is treated herein as a historical resource for the purposes of CEQA.

(d) *Reevaluation of 5407 Wilshire Boulevard as a Contributor to the Miracle Mile Historic District*

(i) *5407 Wilshire Boulevard Integrity Analysis*

5407 Wilshire Boulevard is an amalgamation of what were originally three separate buildings (5405-5411 Wilshire Boulevard, 5413-5415 Wilshire Boulevard, and 5421-5425 Wilshire Boulevard) into a single large building. The three original buildings were all identified as contributors to the Miracle Mile Historic District in 1983 but are no longer discernible as separate and distinct buildings today. 5407 Wilshire Boulevard (collectively 5405-5425 Wilshire Boulevard) has been substantially altered after identification as a contributor to the Historic District in 1983, and the integrity of the component contributing buildings has been severely compromised:

- **Location:** The building remains on the original site of the three component buildings and therefore retains integrity of location.
- **Design:** The 1991 conversion into a single building has resulted in the removal of significant character-defining features of the original buildings, altering their exterior appearance. The current form presents an integration of historic features and more recent elements as a single, unified design. The interior demising walls were removed creating one large interior space. Therefore, it does not retain integrity of design.
- **Setting:** The existing neighborhood consists primarily of low- and mid-rise commercial buildings that reflect the area's historic character. The property therefore retains integrity of setting.
- **Materials:** The exterior of 5407 Wilshire Boulevard has undergone extensive alterations. The storefronts and ceramic tile base of the 1934 and 1936 buildings have been removed and the openings filled with new construction. Projecting display windows have been added to the façade of the 1936 building, and hollow metal exit doors, concrete stairs, and raised planters have been added to the façades of both buildings. The building that housed

the Flying Saucer Restaurant and Brown's Wilshire Bakery (built in 1938) was demolished and a large addition on the west side of the 1934 building was constructed that mimics some of the Streamline Moderne features of the older structures. The interior demising walls have been removed creating one large interior space. These alterations have resulted in the removal of significant historic materials; therefore, the building no longer retains integrity of materials.

- **Workmanship:** The three original buildings have been substantially altered and no longer retain the physical evidence of period construction techniques. The building does not retain integrity of workmanship.
- **Feeling:** Because the original three buildings were combined into a single building and substantially altered, the original three buildings are no longer readily discernible. Therefore, 5407 Wilshire Boulevard no longer retains integrity of feeling.
- **Association:** 5407 Wilshire Boulevard no longer retains enough physical features to convey the original configuration of three commercial buildings in the Miracle Mile portion of Wilshire Boulevard from the 1930s. 5407 Wilshire Boulevard does not retain integrity of design, materials, workmanship, or feeling and therefore no longer conveys the original condition associated with the growth of commercial development on Wilshire Boulevard in the 1930s. It therefore no longer retains integrity of association.

Although remnant façade features from two of the original buildings remain, these features now appear as components of a single, unified façade for one building. Therefore, the three original contributing buildings are no longer intact and do not retain sufficient integrity to remain eligible as contributors to the Miracle Mile Historic District. 5407 Wilshire Boulevard is, therefore, considered herein as a non-contributor to the Miracle Mile Historic District for the purposes of CEQA.

(e) *Evaluation of 5401 Wilshire Boulevard (Sontag Drug Building)*

(i) *Relevant Contexts and Themes*

(a) *Los Angeles Citywide Historic Context Statement*

Los Angeles' Citywide 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.

The Sontag Drug Building is distinguished by its Streamline Moderne architectural style as applied to a retail commercial building. It is evaluated as an individual resource below using the following contexts and themes:

Context: Architecture and Engineering, 1850-1980

Sub-Context: L.A. Modernism, 1919-1980

Theme: Related Responses to Modernism, 1924-1970

Sub-Theme: Streamline Moderne, 1935-1945

Summary Statement of Significance: Resources evaluated under this sub-theme are significant in the area of Architecture as excellent examples of the Streamline Moderne styles and exhibit quality of design through distinctive features. Streamline Moderne architecture was popular between the mid-1930s and mid-1940s; the style underscored the American public's affinity for technology, progress, and modernity, and evinces a sense of motion and speed. It was applied to single-family and multi-family residences, as well as some commercial and institutional properties. On rare occasion, it was applied to industrial properties.

Period of Significance: 1935-1945

Period of Significance Justification: The Streamline Moderne style reached its zenith between the mid-1930s and World War II, at which point new construction came to a halt and Americans' taste in architecture evolved toward more puritanical idioms of Modern architecture. The period of significance for this theme begins in 1935, when the earliest known examples of the style were built in Los Angeles; it ends in 1945, which marks the beginning of the post-World War II era and the period by which the style had squarely fallen out of favor with the American public.

Geographical Location(s): Citywide; commercial and institutional examples are concentrated in Hollywood and the Wilshire area, and particularly among major vehicular and commercial corridors; residential examples are located in the Silver Lake, Hollywood, Los Feliz, and Wilshire areas and occasionally in the hillside communities of the San Fernando Valley. Industrial examples are found near Downtown and Hollywood.

Criteria: NR: C CR: 3 Local: 3

Associated Property Types:

- Residential – Single-Family Residence
- Residential – Multi-Family Residence
- Commercial

- Institutional
- Industrial

Property Type Description: The Streamline Moderne style was a versatile idiom that was applied to an array of property types. Some of the most iconic and architecturally distinctive examples of the style are represented in the context of commercial buildings; however, the style was often expressed in the form of custom single-family residences and small-scale multi-family residences. To a lesser extent, the style was also applied to institutional and industrial properties. Groupings of resources in the style may be evaluated as historic districts. Given Streamline Moderne's relatively brief period of popularity, examples of the style are relatively rare in Los Angeles.

Eligibility Standards:

- Was constructed during the period of significance
- Exhibits quality of design through distinctive features
- Is an excellent example of the style

Character-Defining/Associative Features:

- Retains most of the essential character-defining features from the period of significance
- Horizontal orientation
- Rounded corners and curved surfaces, emulating a "windswept" appearance
- Flat or nearly flat roof
- Speedlines at wall surfaces, such as horizontal moldings and continuous sill courses
- Smooth stucco cladding
- Metal, often steel casement, windows
- Unadorned wall surfaces, with minimal ornament
- Windows "punched" into walls, with no surrounds

Integrity Considerations:

- Should retain integrity of Location, Design, Materials, Workmanship, and Feeling from the period of significance
- Retains sufficient integrity to convey significance
- Original setting may have changed (surrounding buildings and land uses)
- Original use may have changed
- Replacement of some windows and doors may be acceptable if the openings have not been resized and original fenestration patterns have not been disrupted

(f) *Evaluation as an Individual Resource*

(i) *Evaluation Under Criterion NR A/CR 1/LA County CR 1*

This investigation did not identify any associations with events that have made a significant contribution to the broad patterns of local, regional, or national history specific to the Sontag Drug Building. The Sontag Drug Building is broadly associated with the development of the Miracle Mile during the 1920s and 30s, which anticipated the transformation of settlement patterns and the decentralization of commercial centers in the 20th century as the automobile became the preferred mode of transportation. This association, however, is not specific to the Sontag Drug Building individually but is conveyed collectively with neighboring commercial development of the period along the Miracle Mile segment of Wilshire Boulevard. The collective significance of Miracle Mile development patterns has been more appropriately recognized as the Miracle Mile Historic District of which the Sontag Drug Building is a contributing property. For these reasons, the Sontag Drug Building is not eligible for listing individually under criteria A/1/1.

(ii) *Evaluation Under Criterion NR B/CR 2/LA County CR 2*

This investigation did not identify any associations with the lives of individuals or groups important to national, state, or local history to suggest that the Sontag Drug Building is significant under Criterion B/2. As a commercial retail building, the Sontag Drug Building has been home to a variety of businesses since its original occupation by the Sontag Cut-Rate Drug Company ended in 1944. These included various retail concerns including a consumer electronics store, delicatessen, and a print shop but none appear to be associated with historically important persons or groups.

As noted in the 2020 HCM application for the Sontag Drug Building, the upper-story office was occupied by the prominent real estate firm, the Shattuck Company, beginning in 1960. The company's namesake founder, Charles B. Shattuck (1907-1964) was an esteemed figure in the real estate industry who rose to national prominence and held important positions with several national real estate organizations. By the time the Shattuck Company set up shop at 5401 Wilshire, however, Shattuck was near the end of his life; his long career more closely associated with the Shattuck Company's original headquarters on Vermont Avenue. As such, the Sontag Drug Building was not important in the real estate career of Charles B. Shattuck. For these reasons, the Sontag Drug Building is not eligible for listing as a historic resource under criteria B/2/2.

(iii) *Evaluation Under Criterion NR C/CR 3/Local 3/LA County CR 3*

The Sontag Drug Building meets the eligibility standards under the Streamline Moderne sub-theme since it exhibits quality of design through distinctive features and is an excellent example of the Streamline Moderne architectural style as applied to a commercial building. The Sontag Drug Building was also constructed in 1936, during the period of significance for this theme. The

Sontag Drug Building exhibits several key aspects of the Streamline Moderne architectural style. These include its smooth stucco exterior walls, rounded corners, continuous band of storefront glazing, overlapping curving planes and volumes, continuous cornices, squared spire, patterned bands, facets, and fluting.

As such, the Sontag Drug Building is individually eligible for historic listing under criteria C/3/3 as an excellent intact example of a Streamline Moderne commercial building. The period of significance under this criterion is 1936, the date of construction for the building.

(iv) Evaluation Under Criterion NR D/CR 4

This investigation did not uncover any evidence to suggest that the Sontag Drug Building is significant under Criterion D/4. Criteria D/4, which most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. This evaluation applies only to above ground or “built” resources, and no evidence was uncovered to suggest that the Sontag Drug Building itself has any potential to yield or reveal information important in prehistory or history.

For these reasons, the Sontag Drug Building is not eligible for listing as a historic resource under D/4/4.

Although there have been some alterations to the building over time, 5401 Wilshire Boulevard retains a high degree of integrity:

- **Location:** The building remains on its original site and therefore retains integrity of location.
- **Design:** The building retains the significant character-defining features of its original Streamline Moderne style, including horizontal massing, smooth concrete plaster exterior walls, decorative terra cotta trim, and steel-sash windows. Therefore, it retains integrity of design.
- **Setting:** The existing neighborhood consists primarily of low- and mid-rise commercial buildings that reflect the area’s historic character. The property therefore retains integrity of setting.
- **Materials:** Although there have been some minor alterations over time, the building retains the majority of its exterior historic materials.
- **Workmanship:** The building retains the physical evidence of period construction techniques and therefore retains integrity of workmanship.
- **Feeling:** The building retains the significant physical features that convey its historic character as mid-1930s commercial property, and therefore retains integrity of feeling.
- **Association:** The building continues to convey its historic character as an early twentieth-century commercial structure along the Miracle Mile section of Wilshire Boulevard, and therefore retains integrity of association.

Because the Sontag Drug Building retains all seven aspects of integrity, it remains eligible as a contributor to the Miracle Mile Historic District identified in 1983 and listed in the California Register. Sontag Drug Building is also individually eligible for historic listing under criteria C/3/3 as an excellent intact example of a Streamline Moderne commercial building.

It is considered herein as a contributor to the Miracle Mile Historic District and as an individually eligible resource for the purposes of CEQA.

(g) *Miracle Mile Historic District*

The 1983 evaluation methodology for the Miracle Mile Historic District differs from the methodology as practiced today. Boundaries were drawn to specifically exclude a 22-story office building constructed in 1960 (5455 Wilshire) despite it being located on Wilshire Boulevard and contiguous with other buildings in the Historic District. One additional building (5421-5425 Wilshire Boulevard) was noted as “not presently within the boundaries” of the District, “but considered appropriate as a contributor.” Another building at 5376 Wilshire Boulevard is identified as “non-contributing” on the map included in the 1983 documentation but is excluded from the count of 19 buildings within the Historic District. Current historic district evaluation methodology would not arbitrarily omit contiguous contributing or non-contributing buildings. In addition, several buildings identified in 1983 as contributing to the Miracle Mile Historic District have subsequently been demolished or substantially altered. For these reasons, the 1983 finding of a historic district containing 19 contributing buildings is no longer accurate when looked at today.

The omission of 5455 Wilshire Boulevard is not addressed in the 1983 documentation, but it is assumed the building was excluded because its construction date of 1960 is well outside of the ten-year period (1928-1938) during which all of the buildings identified as contributing were constructed. 5455 Wilshire Boulevard was constructed in a Corporate International architectural style, reflecting its mid-20th century development date. It does not display the Art Deco, Streamline Moderne or Period Revival architectural styles and features associated with the initial, pre-World War II development of the Miracle Mile segment of Wilshire Boulevard. Using current methodology, 5455 Wilshire Boulevard would be included within the Historic District boundary as a *non-contributing* building.

The reasons for excluding 5421-5425 Wilshire Boulevard from the list of contributing buildings despite it being “considered appropriate as a contributor” and located on Wilshire Boulevard contiguous with other contributing buildings is also unclear. Evaluated today, the building as it appeared in 1983 would be considered a contributor to the Historic District. In summary, using current evaluation methodology, 19 contributing buildings and 3 non-contributing buildings would comprise the Miracle Mile Historic District as *it existed* in 1983.

Of the 19 buildings originally evaluated as contributing to the Historic District in 1983, several have subsequently been demolished or substantially altered. 5318-5326 Wilshire Boulevard, a 1936 two-story commercial building identified as a contributing building in 1983, was demolished in 2015 to make way for the construction of the LA Metro subway station at Wilshire Boulevard

and La Brea Avenue. A one-story commercial building at 5359 Wilshire Boulevard was also demolished in 2006 and replaced by a 4- and 5-story apartment building. The original façade was retained and attached to the 2006 apartment building.

As noted above, three buildings located on the Project Site (5405-5411 Wilshire Boulevard, 5413-5415 Wilshire Boulevard, and 5421-5425 Wilshire Boulevard) were merged into a single structure (5407 Wilshire Boulevard). Although remnant façade features from two of the original buildings remain, these features now appear as components of a single, unified façade for one building.

Field investigation revealed that the one-story commercial building at the northeast corner of Wilshire Boulevard and Dunsmuir (5467 Wilshire Boulevard) has been substantially altered since it was identified as a contributing building in 1983. Alterations include façade modifications and infill of windows that removed storefronts, display windows and closed the main entrance on Wilshire Boulevard. Only the upper portions of the building's south- and west-facing facades retain any of the original Streamline Moderne detailing. Similarly, the primary façade of the one-story commercial building at 5507-5511 Wilshire Boulevard has undergone a wholesale overhaul implementing a neo-Art Deco façade. Alterations include a new primary entrance, new flanking windows and tile recladding of the entire façade.

In summary, since the Miracle Mile Historic District was first identified in 1983, the following changes have occurred:

- One contributing building has been demolished;
- One contributing building has been demolished and replaced with an apartment building;
- Three contributing buildings have been partially demolished and combined into one (1) building; and
- Two buildings have been substantially altered and no longer retain sufficient integrity to be eligible for listing as contributors.

Today, the Miracle Mile Historic District contains 12 contributing buildings and 7 non-contributing buildings. Despite these alterations, the Historic District is treated herein as a historical resource for the purposes of CEQA. A summary of the Miracle Mile Historic District is included in Table IV.A-2.

**Table IV.A-2
Miracle Mile Historic District Summary**

No.	ADDRESS	APN#	DATE	DESCRIPTION	1983 ASSESSMENT	CURRENT STATUS	2023 ASSESSMENT	OTHER HISTORIC
1	5318-5326 WILSHIRE	5089-001-026	1936	2-story Spanish Revival commercial building	Contributor	DEMOLISHED Contributing building removed for Metro Station construction.	Currently a construction staging site.	N/A
2	5350-5352 WILSHIRE	5089-002-003	1938	2-story Streamline Moderne commercial building	Contributor	EXTANT	Contributor	N/A
3	5354-5356 WILSHIRE	5089-002-002	1930	1-story commercial building	Contributor	EXTANT	Contributor	N/A
4	5358-5364 WILSHIRE	5089-002-026	1930/ Remodeled 1939	2-story Streamline Moderne building	Contributor	EXTANT	Contributor	N/A
5	5359 WILSHIRE	5508-008-001		1-story Zigzag Moderne commercial building	Contributor	DEMOLISHED Façade retained and incorporated into an apartment building constructed in 2006.	Non-contributor	N/A
6	5363 WILSHIRE	5508-008-027	1928	1- and 2-story Streamline Moderne commercial building with corner tower	Contributor	EXTANT	Contributor	N/A
7	5366-5374 WILSHIRE	5089-002-025	1926/ Remodeled in 1939	2-story commercial building with Mimetic storefront (Dark Room)	Contributor	EXTANT.	Contributor	HCM No. 451 (façade only)
8	5401-5405 WILSHIRE	5508-009-001	1936	1-story Streamline Moderne commercial building	Contributor	EXTANT	Contributor	Appears individually eligible for historic listing.

**Table IV.A-2
Miracle Mile Historic District Summary**

No.	ADDRESS	APN#	DATE	DESCRIPTION	1983 ASSESSMENT	CURRENT STATUS	2023 ASSESSMENT	OTHER HISTORIC
9	5405-5411 WILSHIRE	5508-009-029	1936	1-story Streamline Moderne commercial building.	Contributor	Primary façade altered and building combined with 5413 5415 and 5421-5425 Wilshire Blvd. into a single structure (540 Wilshire Blvd.) in 1991.	Non-contributor (Single building at 5407 Wilshire)	N/A
10	5410 WILSHIRE	5089-003-008	1931	2-story commercial block with central 10-story office tower (Dominguez-Wilshire Building)	Contributor	EXTANT	Contributor	N/A
11	5413-5415 WILSHIRE	5508-009-029	1934	1-story Streamline Moderne market building originally constructed as "A&P Food Palace"	Contributor	Primary façade altered and building combined with 5405 5411 and 5421-5425 Wilshire Blvd. into a single structure (540 Wilshire Blvd.) in 1991.	Non-contributor (Single building at 5407 Wilshire)	N/A
12	5421-5425 WILSHIRE	5508-009-029	1938	1-story commercial building with two Period Revival storefronts	Noted as "not presently within the boundaries" of the district, "but considered appropriate as a contributor"	Partially demolished and combined with 5405-5411 and 5413-5415 Wilshire Blvd. into a single structure (540 Wilshire Blvd.) in 1991.	Non-contributor (Single building at 5407 Wilshire)	N/A
13	5450 WILSHIRE	5089-003-019	1937	1-story Streamline Moderne commercial building	Contributor	EXTANT	Contributor	N/A
14	5455 WILSHIRE	5508010025	1960	22-story Corporate Modern office building.	Building drawn out of the district and not counted in 198	EXTANT	Non-contributor	Identified as individually eligible for listing in the NR, CR and for local listing by SurveyLA.

**Table IV.A-2
Miracle Mile Historic District Summary**

No.	ADDRESS	APN#	DATE	DESCRIPTION	1983 ASSESSMENT	CURRENT STATUS	2023 ASSESSMENT	OTHER HISTORIC
15	5458-5464 WILSHIRE	5089-003-020	1936	1-story Streamline Moderne commercial building	Contributor	EXTANT	Contributor	N/A
16	5466-5470 WILSHIRE	5089-003-021	1928	2-and 4-story Spanish Revival commercial building	Contributor	EXTANT	Contributor	Identified as individually eligible for CR and local listing by Survey LA.
17	5467 WILSHIRE	5508-010-024	1936	1-story Streamline Moderne commercial building	Contributor	EXTANT (Substantial alteration)	Non-contributor	N/A
18	5500 -5522 WILSHIRE	5089-004-016	1929	2-story commercial block with central 9-story office tower (Wilshire Tower)	Contributor	EXTANT	Contributor	HCM No. 332
19	5505 WILSHIRE	5508-011-001	1929	2-story Art Deco/Modere commercial building	Contributor	EXTANT	Contributor	N/A
20	5507-5511 WILSHIRE	5508-011-002	1937	1-story commercial building	Contributor	EXTANT (Substantial alteration)	Non-contributor	N/A
21	5515-5519 WILSHIRE	5508-011-026	1936	Deco/Modern e theater building (El Rey Theater)	Contributor	EXTANT	Contributor	HCM No. 520

Source: Historic Resources Group, 2023. Refer to Appendix B of this Draft EIR.

(10) Historical Resources in the Potential Impact Area

The larger area surrounding the Project Site is rich in historical resources. Previously identified historical resources located adjacent to, but outside the Project Site include other contributing buildings to the Miracle Mile Historic District, some of which have also been listed as individual resources or identified as eligible for historic listing as individual historical resources. A historic district identified by SurveyLA, the Ridgeley Drive-Detroit Street Multi-Family Residential Historic

District, sits immediately north of the Project Site. The Miracle Mile HPOZ is located in the vicinity of the Project Site south of Wilshire Boulevard. All of these resources are considered herein as historical resources for the purposes of CEQA.

3. PROJECT IMPACTS

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the 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 §15064.5;*

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

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

Historical Resources

For the analysis of historical resources, in order to determine whether a project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5, the City uses the following threshold:

A project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in the significance of a historical resource occurs if the project involves:

- 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 site or in the vicinity.

Under CEQA, the key issue relates to how a proposed development may impact the potential eligibility of a structure(s) or a site for designation as a historical resource. The Standards were developed by the U.S. Department of the Interior as a means to evaluate and approve work for federal grants for historic buildings and the federal rehabilitation tax credit. Similarly, the Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to HCMs. Therefore,

the Standards are used for regulatory approvals for designated historical resources, but not for evaluations of potential resources. Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a “safe harbor” by providing either a categorical exemption or a negative declaration for a project which meets the Standards.

Under CEQA, a project would have a significant effect on the environment if the project would result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a).³⁶ 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.”³⁷ The CEQA Guidelines further state that “[t]he significance of a historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local register of historic resources...or its identification in a historic resources survey.”

Archaeological Resources and Human Remains

Thresholds (b) and (c) were scoped out of the Draft EIR in the Initial Study, which is included in Appendix A-1 of this Draft EIR. As demonstrated therein, impacts would be less than significant, and no further analysis is required.

b) Methodology

Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so; (2) a determination of whether the Project would result in a “substantial adverse change” in the significance of the resource

or resources. As part of their evaluation for the Historic Report, HRG conducted field surveys of the existing buildings, structures, objects, and landscaped areas located on the Project Site and in the vicinity. Additionally, HRG reviewed previous historical resource evaluations, inventories, building permits, Sanborn maps, historical photographs, records searches, and newspaper articles of the Project Site and vicinity.

c) Project Design Features

No Project Design Features (PDFs) have been identified with respect to cultural resources.

d) Analysis of Project Impacts

Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

(1) Impact Analysis

This section examines potential impacts to historical resources that would be caused by demolition, new construction, and rehabilitation activities on the Project Site as part of the Project. The Project would demolish an existing building at 5407 Wilshire Boulevard which is a non-contributing building to the Miracle Mile Historic District and construct a new and much larger building in its place. The Project would also preserve in place and rehabilitate the south- and east-facing facades of Sontag Drug Building, which is a contributing building to the Historic District and was also identified in this analysis as eligible for listing as an individual historic resource.

Accordingly, the Project would remove a building located within a historic district; construct a new building in its place; and preserve the primary façades of a building that is a contributor to the Miracle Mile Historic District, and eligible for historic listing as an individual historic resource and incorporate them into a new building in the same location. Alteration of a historical resource and/or the immediate surroundings of a historical resource to such a degree that its significance would be materially impaired constitutes a substantial adverse change under CEQA. The significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and justify its inclusion in, or eligibility for inclusion in the California Register of Historical Resources or in a local register of historical resources.

In order for the demolition, new construction, and incorporation of preserved facades into a new building, proposed by the Project to be considered a substantial adverse change, however, it must be shown that the Project would materially impair the integrity and/or significance of the Miracle Mile Historic District and/or other nearby historical resources. Historical resources located on the Project Site are most likely to be vulnerable to impacts related to changes caused by demolition, rehabilitation and adjacent new construction. Historical resources located outside of, but immediately adjacent to the Project Site also can be adversely impacted because they border the affected area. Resources physically separated from the Project Site by other buildings, streets or distance are not likely to be adversely impacted due to the spatial separation from the affected area.

This analysis focuses on the Project Site and the parcels in the Potential Impact Area which are the areas reasonably foreseen to be potentially vulnerable to significant impacts caused by the Project.

(a) *Potential Impacts to the Miracle Mile Historic District*

The Miracle Mile Historic District is historically significant as a linear grouping of properties associated with the commercial development of Los Angeles in the 1920s and 1930s, and as a rare, intact collection of Art Deco and Streamline Moderne commercial architecture in Los Angeles. The Historic District is composed of a variety of commercial property types from the third and fourth decades of the 20th century lining Wilshire Boulevard. District buildings are oriented

toward the street with architectural articulation largely confined to street-facing façades. The Historic District's historic significance is experienced primarily from the street - either by pedestrians or passing vehicles. In addition to individual contributing buildings, features important to the District include the pattern of tightly spaced buildings defining a linear commercial corridor, active public engagement at street level, and the public circulation space delineated by a uniform building street wall.

The Project Site is located inside the Miracle Mile Historic District boundaries and the Project would involve three component activities that have the potential to adversely impact the District:

- Demolition of the existing building at 5407 Wilshire Boulevard.
- Preservation of two façades of the existing Sontag Drug Building and their incorporation into a new one-story building in the same location as the Sontag Drug Building.
- Construction of new building on the Project Site.

Potential impacts of these activities to the Miracle Mile Historic District are discussed below.

(i) Demolition of 5407 Wilshire Boulevard

The Project would demolish the existing building at 5407 Wilshire Boulevard. As discussed earlier in this section, 5407 Wilshire Boulevard is an amalgamation of what were originally three separate buildings into a single large building. The three original buildings were all identified as contributors to the Miracle Mile Historic District in 1983 but are no longer discernible as separate and distinct buildings today. Although remnant façade features from two of the original buildings remain, these features now appear as components of a single, unified façade for one building. Therefore, the three original contributors are no longer intact and do not retain sufficient integrity to remain eligible as contributors to the Miracle Mile Historic District.

Because 5407 Wilshire Boulevard is a non-contributing building to the Miracle Mile Historic District, its demolition will not diminish the number of contributing buildings to the Historic District. All of the extant contributing buildings to the Historic District will remain intact after removal of 5407 Wilshire Boulevard, and the Historic District will continue to convey its historic significance as an intact grouping of Art Deco and Streamline Moderne commercial buildings associated with commercial development in Los Angeles during the 1920s and 30s. Because the Historic District will continue to convey its historic significance, it will remain eligible for listing in the National Register and California Register. **Therefore, demolition of 5407 Wilshire Boulevard would not result in significant impacts to the Historic District.**

(ii) Preservation of Primary Sontag Drug Building Façades and Incorporation into a New Building

The primary south and east façades of the existing Sontag Drug Building at 5401 Wilshire Boulevard would be preserved in place and rehabilitated, preserving the building's Streamline Moderne architectural stylistic features. After completing the removal of non-structural elements

from the building's interior, steel bracing beams would be positioned along the south and east elevations to secure the south- and east-facing façades. The existing 1947 rear addition, north wall, west wall, and roof would be removed and later recreated to approximate the original dimensions and volume of the original Sontag Building. The reconstructed roof area would incorporate a landscaped outdoor terrace.

The Sontag Drug Building is listed in the California Register as a contributor to the Miracle Mile Historic District. Potential impacts from the preservation of the primary facades of the Sontag Drug Building and their incorporation into a new one-story building are analyzed below with respect to the building's historic significance as is a *contributor* to a historic district. A historic district derives its significance as a single unified entity, and it is the Miracle Mile Historic District as a whole that is the historic resource in question. Potential impacts to the Sontag Drug Building are first, therefore, considered in the context of the overall impact to the Miracle Mile Historic District.

As noted above, the Project would require the demolition of a substantial amount of original building fabric including the west wall, north wall, roof, and foundation of the Sontag Drug Building. Retention of the south and east façades, however, would preserve important physical features that convey the building's distinctive Streamline Moderne architectural style. These include overlapping planes and projecting volumes of smooth plaster, rounded corners, continuous cornices with geometrically patterned bands, and decorative fluting. It is these features that represent the building's signature Streamline Moderne architectural style and mid-1930s provenance. The Project would require the removal of the remaining building volume to allow for subterranean excavation. The building portions to be removed include the utilitarian north (rear) façade and 1947 addition the west wall, north wall, and roof. Interior spaces would also be removed. The preserved south and east façades would be incorporated into a new one-story building in the same location as the existing Sontag Drug Building. When complete, the new building will generally appear as the Sontag Drug Building was originally designed, with the extant character-defining features of the primary south and east façades preserved and restored.

Although the preserved south- and east-facing façades of the Sontag Drug Building would continue to convey important aspects of the original building's Streamline Moderne architectural style, a substantial amount of original building fabric including the west wall, north wall, and roof would be removed. The replacement building, (incorporating the preserved facades) while generally the same in size, scale, and massing, would ultimately be a new building containing no original materials or fabric outside of the preserved façades. This will adversely affect the Miracle Mile Historic District by substantially reducing the integrity of one contributing building.

The Project would not alter or demolish, however, any other contributing buildings to the Miracle Mile Historic District. All of the 11 other contributing will remain intact in their current locations and would not be materially altered by the façade preservation and new construction. All of the other contributing buildings that characterize and contribute to the Miracle Mile Historic District would remain and continue to convey their historic significance. Despite the substantial alteration of one

contributing building, the majority of the contributing buildings, all of which contain important physical characteristics of the Historic District, will remain. Despite the loss of integrity of the contributing Sontag Drug Building, the Miracle Mile Historic District would continue to reflect its important associations with the commercial development of the Miracle Mile area in Los Angeles during the 1920s and 30s after implementation of the Project.

For the purposes of CEQA impacts analysis, this investigation presumes that the preservation of the Sontag Drug Building's primary south- and east-facing façades, if done improperly, has the potential to damage historic features and fabric and reduce the integrity of the south and east façades such that they would no longer convey an accurate representation of the Streamline Moderne architectural elements that contribute to the overall character of the Miracle Mile Historic District. Without mitigation to ensure minimal loss of original materials and character-defining features during the preservation of the south and east façades and their incorporation into a new one-story building, the proposed Sontag Drug Building façade preservation could result in significant impacts to the Miracle Mile Historic District.

Preservation of the south- and east-facing façades of the Sontag Drug Building and their incorporation into a new one-story building also has the potential to imply a false historic condition by suggesting that the resulting new building with incorporated preserved facades represents the Sontag Drug Building in its original condition. Without mitigation to make clear that the primary façades of the Sontag Drug Building were preserved and incorporated into a new building, incorporation of the preserved façades in a new building has the potential to create a false sense of historic development. Without mitigation measures that address the façade preservation and new construction and communicate its true alteration history, the new building replacing the Sontag Drug Building may further reduce the overall integrity of the Miracle Mile Historic District.

Preservation of the Sontag Drug Building's two primary façades and their incorporation into a new building at the same location will adversely affect the Miracle Mile Historic District by reducing the integrity of one contributing building. **Therefore, without mitigation, Project impacts on the Miracle Mile Historic District as a result of changes to the Sontag Drug Building would be potentially significant.**

(iii) Construction of a New Building on the Project Site

The Project would construct a new 42-story mixed-use building at the center of the Miracle Mile Historic District. The 516-foot-tall building will consist of a 39-story residential tower over a 3-story podium and 3 levels of subterranean parking. At 42 stories, the proposed new building would be substantially taller than any other existing building located within the Historic District. The non-contributing office building immediately west of the Project Site at the northwest corner of Cochran Avenue and Wilshire Boulevard is the tallest existing building in the immediate vicinity. Constructed in 1960, that building is 22 stories tall. Contributing buildings to the District, constructed in the 1920s and 30s, are largely one- and two-story buildings. Two exceptions are the former Wilshire Tower building at 5500-5522 Wilshire Boulevard and the retail and office

complex at 5410 Wilshire Boulevard which include tower components that are 9 and 10 stories in height respectively. The tower portion of the Project would be intermittently visible looking north from Wilshire Boulevard and its cross-streets within the District. The new building would introduce an imposing new skyline element to the more modest building heights located within the District.

The podium level would rise 49 feet in height with the tower set back from the podium edges, effectively reducing the perception of mass and height from street level. At 49 feet, the podium height would be compatible with the heights of contributors to the Historic District, which generally range from one to four stories in height. The tower placement incorporates a substantial setback from the west, allowing the podium level height to define the western edge of the Project. The tower is also set back from the east so that the full height of the new building is not immediately juxtaposed with the new one-story building that would replace the Sontag Drug Building and incorporate its two primary façades. A small portion of the level 3 podium deck would cantilever over the new building replacing the Sontag Drug Building on the east side. The overhanging deck would be substantially set back from Wilshire Boulevard and not be visible from the public right-of-way. New construction would be separated from the north (rear) façade of Sontag Drug Building by a street-to-street drive providing access to the parking garage.

In addition, the Project design is intended to reinforce the existing urban pattern context established within the Miracle Mile Historic District. The Project's south-facing façade includes active retail uses on the ground floor with direct pedestrian access at street level. The building would orient to the sidewalk, continuing the pattern of the street-facing storefronts along Wilshire Boulevard. Aspects of the architecture would also reinforce the existing design context established within the District. The architectural design includes a unique curvilinear form inspired by the rounded corners and volumes of the surrounding Streamline Moderne architecture.

Integrity is the ability of a historical resource to convey its historic significance. Despite the introduction of substantial new construction within the Miracle Mile Historic District, all but one of the seven aspects of integrity would be unaffected by the Project. The Project would not affect the integrity of *location, design, materials, or workmanship* for the District or its component contributing buildings. With the exception of the Sontag Drug Building of which two façades would be preserved and incorporated into a new one-story building in the same location, all of the other contributing buildings to the Historic District would remain intact in their current locations and would not be materially altered by new construction associated with the Project. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical components that characterize and contribute to the Historic District would remain and continue to convey their historic significance.

Because all the important physical characteristics of the Historic District will remain, the Historic District would continue to reflect its important associations with the commercial development of the Miracle Mile area in Los Angeles during the 1920s and 30s, accordingly integrity of *association* would also remain unaffected by the Project. The only aspect of integrity that could possibly be affected by the Project is *setting*.

Setting features important to the Miracle Mile Historic District include the configuration of streets and sidewalks fronting Historic District buildings, the pattern of tightly spaced buildings defining a linear commercial corridor, and the public circulation space delineated by a uniform building street wall. Adding considerable height and mass to the Historic District will not adversely alter these setting features. Moreover, height differences have existed within the Historic District since it was first identified during the 1980s. The non-contributing 1960s office building immediately west of the Project Site at the northwest corner of Cochran Avenue and Wilshire Boulevard is 22 stories tall.

Despite new construction that is substantially taller than anything currently located in the Miracle Mile Historic District, all the relevant aspects of integrity will be unaffected by the Project, so that the historic integrity of the Historic District and all its contributing buildings will be retained. While the Project would alter the Historic District setting by adding a new building substantially taller than the existing buildings in the Historic District, this alteration would not materially impair the Historic District such that it can no longer convey its historic significance. After construction of the Project, the Historic District, including all but one of its contributing buildings, will remain intact and collectively will continue to convey their historic significance. For these reasons, the significance and integrity of the Miracle Mile Historic District will not be materially impaired. **Therefore, the Project would not result in significant impacts to the District as a result of the new building.**

(b) *Potential Impacts to the Sontag Drug Building as an Individual Historic Resource*

The Sontag Drug Building is also considered historically significant as an *individual* resource for the purposes of CEQA. In this context, potential impacts to the building as a single entity are considered.

(i) *Preservation of the Primary Sontag Drug Building Façades and Incorporation into a New Building*

As noted above, the primary south and east façades of the Sontag Drug Building would be preserved in place and incorporated into a new one-story building at the same location.

The Project would require the demolition of a substantial amount of original building fabric including the west wall, north wall, roof and foundation. The majority of the Sontag Drug Building's original building fabric would be removed except the primary south and east façades. Retention and rehabilitation of the south and east façades would preserve the most important physical features that convey the building's distinctive Streamline Moderne architectural style. The building itself, however, will be removed. When evaluated within the context of an individually eligible building, the two remaining facades would become remnants of what was once a complete building.

The majority of the Sontag Drug Building would be removed except the primary south and east façades. The substantial demolition of the Sontag Drug Building would result in significant direct impacts to the Sontag Drug Building as defined by CEQA. Per CEQA Guidelines §15064.5(b), the physical demolition of a historical resource is a significant direct impact that cannot be mitigated to a less-than-significant level. **Therefore, Project impacts related to the historical significance of the Sontag Drug Building would be significant.**

(c) *Potential Impacts to Historic Resources in the Potential Impact Area*

(i) *Ridgeley Drive-Detroit Street Multi-Family Residential Historic District*

The Ridgeley Drive – Detroit Street Multi-Family Residential Historic District was identified through SurveyLA in 2015. Located immediately north of the Project Site, the potential Ridgeley Drive – Detroit Street Historic District is composed of single and multi-family homes built during the period of 1920 to 1952. The Project Site is located outside the potential Ridgeley Drive – Detroit Street Historic District and all activity associated with the Project would remain outside of the potential Ridgeley Drive – Detroit Street Historic District boundaries.

The Project does not include the demolition, relocation, rehabilitation, alteration, relocation or conversion of any contributing or non-contributing building to the potential Ridgeley Drive-Detroit Street Multi-Family Historic District. All the existing buildings that comprise the potential Ridgeley Drive – Detroit Street Historic District would remain unchanged and in their original location after implementation of the Project.

The Project would construct a new 42-story mixed-use building directly south of the Ridgeley Drive – Detroit Street Multi-Family Residential Historic District, adjacent to two contributing buildings at the southern edge of the block between Cochran Avenue and Cloverdale Avenue. At 42 stories, the proposed new building would be substantially taller than any potential Ridgeley Drive – Detroit Street Historic District building, all of which are between one- and four-stories in height. The tower would be intermittently visible looking south from the potential Ridgeley Drive – Detroit Street Historic District, introducing an imposing new skyline element as a backdrop to the more modest building heights located within in the potential Ridgeley Drive – Detroit Street Historic District.

The two potential Ridgeley Drive – Detroit Street Historic District buildings directly bordering the Project Site (661 Cloverdale Avenue and 660 Cochran Avenue) are both two-story apartment buildings constructed in 1928. The proposed new building would be constructed to the northern property line where the podium level would rise 49 feet in height. Although this height is twice the height of the immediately adjacent apartment buildings to the north, it is generally consistent with several contributing buildings within the Ridgeley Drive – Detroit Street Multi-Family Residential Historic District which reach heights of over 50 feet. These include 4-story apartment buildings at 603 Cochran, 636 Cochran, and 601 Cloverdale.

The tower would be set back over 40 feet from the northern property line, and over 60 feet from the western property line, substantially reducing the perception of height from street level. Despite introducing substantial new height to the skyline looking south, the proposed new construction would not result in significant adverse effects to the potential Ridgeley Drive-Detroit Street Multi-Family Historic District. Features important to the significance of the potential Ridgeley Drive-Detroit Street Historic District. are largely contained within the proposed Historic District boundaries and are best experienced within the proposed Historic District. The new construction associated with the Project would not interrupt the configuration of buildings, their spatial relationships to each other, and their relationship to the street that characterize the potential Ridgeley Drive – Detroit Street Historic District as it is experienced. The pattern of regularly spaced residential buildings, uniform setbacks, shallow landscaped front yards, and sidewalks with planted parkways would remain intact and uninterrupted.

Integrity is the ability of a historical resource to convey its historic significance. Despite the introduction of substantial new construction outside of, but adjacent to the potential Ridgeley Drive – Detroit Street Historic District all but one of the seven aspects of integrity would be unaffected by the Project. The Project would not affect the integrity of *location, design, materials, or workmanship* for the potential Ridgeley Drive – Detroit Street Historic District or any of its component contributing buildings. These resources would remain intact in their current locations and would not be materially altered by new construction associated with the Project. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the potential Ridgeley Drive – Detroit Street Historic District and contributing buildings would remain and continue to convey their historic significance. Because all the important physical characteristics of the potential Ridgeley Drive – Detroit Street Historic District will remain, they would continue to reflect their important associations with residential development in Los Angeles during the first half of the 20th century, therefore integrity of *association* would also remain unaffected by the Project. The only aspect of integrity that could possibly be affected by the Project is *setting*.

Setting features important to the Ridgeley Drive – Detroit Street Multi-Family Residential Historic District include the configuration of streets and sidewalks fronting District buildings, the pattern of regularly spaced residential buildings with uniform setbacks, sidewalk parkways and shallow landscaped yards. The addition of a 42-foot building at the southern edge of the potential Ridgeley Drive – Detroit Street Historic District would not adversely alter these setting features.

Despite new construction that is substantially taller than anything currently located in the Ridgeley Drive – Detroit Street Multi-Family Residential Historic District, all of the relevant aspects of integrity would be unaffected by the Project, so that the historic integrity of the potential Ridgeley Drive – Detroit Street Historic District and all its contributing buildings would be retained. While the Project would alter the potential Ridgeley Drive – Detroit Street Historic District setting by constructing substantially taller building immediately south of the potential Ridgeley Drive – Detroit Street Historic District, this alteration would not materially impair the potential Ridgeley Drive – Detroit Street Historic District such that it can no longer convey its historic significance. After

construction of the Project, the potential Ridgeley Drive – Detroit Street Historic District, including all of its contributing buildings, would remain intact and continue to convey its historic significance. For these reasons, the significance and integrity of the potential Ridgeley Drive – Detroit Street Historic District would not be materially impaired. **Therefore, the Project would not result in significant impacts on the potential Ridgeley Drive – Detroit Street Multi-Family Residential Historic District.**

(d) *Other Historic Resources*

All additional historical resources identified in the vicinity of the Project Site, including individually eligible buildings on Wilshire Boulevard and the Miracle Mile HPOZ, are physically separated from the Project Site by other buildings, streets, or distance. Because it would be located a substantial distance from these resources, all activities associated with the Project, including demolition of 5407 Wilshire Boulevard; construction of a 42-story, mixed-use building; and the preservation of the primary Sontag Drug Building façades and their incorporation into a new building, would not demolish or physically alter any of these resources or their immediate surroundings.

As such, the Project would not materially impact the integrity or significance of any of these resources, which would continue to convey their historic significance after implementation of the Project. **Therefore, the Project would not result in significant impacts on any historical resources in the vicinity of the Project Site.**

(2) Mitigation Measures

The following mitigation measures are required to address impacts to the Sontag Drug Building as a contributor to the Miracle Mile Historic District:

MM-CULT-1 Prior to any demolition or removal of historic fabric, the Sontag Drug Building shall be documented in accordance with Historic American Building Survey (HABS) guidelines and standards by a qualified historic preservation professional. Documentation shall include photographs of the existing conditions, any historic plans, photos, or drawings and narrative information regarding the historic significance and development history of the site.

MM-CULT-2 Planning and implementation of the retention and preservation of the south- and east-facing façades of the Sontag Drug Building and their incorporation into a new one-story building at the same location, shall include a Preservation Plan consisting of procedures and methodologies for shoring, materials and character-defining feature protection strategies, contingencies if materials or character-defining features are damaged, as well as construction plans and shoring plans. The Preservation Plan shall be developed by a qualified structural engineer experienced in the preservation of historic buildings in consultation with a preservation architect or other qualified professional who meets the Secretary of the Interior's Professional Qualifications Standards to ensure minimal loss of

original materials and character-defining features during and after the preservation of the Sontag Drug Building south and east façades and their incorporation in a new one-story building. The Preservation Plan shall be submitted to OHR and Planning prior to demolition permits being issued.

MM-CULT-3 The Project shall include an interpretive program located on the Project Site which addresses the commercial history of the site and its component buildings. The interpretive program may include permanent physical displays of photographs and explanatory text that informs the public about the history and original configuration of the buildings as well as the alterations to the Sontag Drug Building.

(3) Level of Significance After Mitigation

Mitigation Measures CULT-1 through CULT-3 would not reduce significant impacts associated with the Project to a less-than-significant level. Impacts to the Sontag Drug Building as an individual resource will remain **significant and unavoidable** after implementation of these measures.

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 discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), the Project requires the excavation of the underlying alluvial sediments and the removal of the artificial fill. According to the Archaeological Report (attached as Appendix C to the Initial Study, which is included as Appendix A-1 of this Draft EIR), the potential for unidentified archaeological resources at the Project Site is found to be low. Nevertheless, the Project would implement Mitigation Measure MM 4.4-2 from the City's Housing and Safety Element EIR.

(2) Mitigation Measures

The Project would implement Mitigation Measure MM 4.4-2 from the City's Housing and Safety Element EIR.

(3) Level of Significance After Mitigation

Implementation of Mitigation Measure MM 4.4-2 from the City's Housing and Safety Element EIR would ensure that Project impacts with respect to archaeological resources are less than significant.

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

(1) Impact Analysis

As discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), no human remains are known to exist at the Project Site. Although unlikely, there is a possibility that human remains could be encountered during excavation and grading activities. Should human remains inadvertently be encountered, the Project would comply with the existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Compliance with these existing regulations would ensure appropriate treatment of any potential human remains discovered during grading and/or excavation activities. Therefore, Project impacts on human remains would be less than significant, and no mitigation measures are required.

(2) Mitigation Measures

Project impacts related to human remains would be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

(a) *Historical Resources*

Cumulative impacts may occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity or contribute to changes within the same historic district. A significant cumulative impact associated with the Project and a related project(s) would occur if the combined impact would materially and adversely alter those physical characteristics that convey the historic significance of a historical resource and that justify its listing, or eligibility for listing, as a historical resource. In assessing cumulative impacts on historical resources, the focus is on related projects that have the potential to contribute to alterations to identified historical resources either on the Project Site and in the Potential Impact Area.

The related project at Cloverdale Avenue and Wilshire Boulevard (Cloverdale and Wilshire Project, Case Number: ENV-2022-7530-EIR) would construct new buildings on a site that includes the commercial buildings on the south side of Wilshire Boulevard between Cloverdale

Avenue and Detroit Street. This block of Wilshire Boulevard is included in the Miracle Mile Historic District boundary and contains contributing buildings to the Historic District. As noted in the Initial Study document for that project, all of the existing buildings are proposed to remain as part of the related project, including the contributors to the Miracle Mile Historic District. New construction associated with the Cloverdale and Wilshire project is contained to the southern half of that project site currently occupied by a surface parking lot. The Cloverdale and Wilshire Project would not alter or demolish any of the contributing buildings to the Historic District located on that project site and all aspects of integrity would be retained.

As such, the Cloverdale and Wilshire Project would not result in impacts to the Miracle Mile Historic District that would be cumulatively considerable with those associated with the Project. **Therefore, cumulative impacts related to historical resources would be less than significant.**

(2) Mitigation Measures

Cumulative impacts would be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

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