

# IV. Environmental Impact Analysis

---

## B. Cultural Resources

### 1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on historical resources. The analysis of historical resources is based on the *Cultural Resources Technical Report* (Historic Report) prepared for the Project by Jenna Snow, February 2021, and included in Appendix E.1 of this Draft EIR. The analysis of archaeological resources is based on Cultural and Paleontological Resource Evaluation and Impact Assessment, prepared for the Project by Statistical Research, Inc., dated February 2021 (Archaeological Report) and included in Appendix E.2 of this Draft EIR.

### 2. Environmental Setting

#### a. Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historic 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 historic resources of national, state, regional, and local significance include the *National Historic Preservation Act of 1966, as amended*; the *California Environmental Quality Act* (CEQA); the California Register of Historical Resources (California Register); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.120 *et seq.*), all of which are summarized below.

#### (1) National Register of Historic Places

Authorized under the National Historic Preservation Act of 1966, as amended, the National Register of Historic Places (National Register) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect the country's historic and archaeological resources. The National Park Service administers the National Register program. To be eligible for listing and/or to be listed in the National Register, a resource must possess significance in American history and culture,

architecture, engineering, or archaeology. The following four criteria for evaluation have been established to determine the significance of a resource:

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

In addition to meeting any or all of the criteria listed above, properties nominated must also possess historic integrity. Historic integrity is defined by National Register Bulletins 15 and 16 as the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's period of significance, and the ability of the property to convey its importance. The National Park Service defines seven aspects of integrity, including *location*, *design*, *setting*, *materials*, *workmanship*, *feeling*, and *association*. These are defined by National Register Bulletin 15 as follows:<sup>1</sup>

- *Location* is the place where the historic property was constructed or the place where the historic event took place.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

---

<sup>1</sup> U.S. Department of Interior, National Park Service, National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, 1990, revised 2002, p. 44–45.

- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.

While it is not necessary for a property to retain all seven aspects of integrity, or “all its historic physical features or characteristics,”<sup>2</sup> the National Park Service notes that the property must retain “the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant and *when* it was significant.”<sup>3</sup>

As to *when* a property was significant, the National Park Service defines the period of significance as “the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for...listing”<sup>4</sup> in the national, state, or local registers.

In evaluating a resource, a property's *character-defining features* are also considered. *Character-defining features* are those visual aspects and physical features or elements, constructed during the property's period of significance, that give the building its historic character and contribute to the integrity of the property.

## (2) California Register of Historical Resources

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. The California Register is an authoritative guide in California used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.<sup>5</sup> The criteria for eligibility for listing in the California Register are based upon National Register criteria. Specifically, in order for a property to be considered eligible for listing in the California Register, it must be significant under any of the following four criteria identified by the Office of Historic Preservation:

---

<sup>2</sup> *National Register Bulletin 15.*

<sup>3</sup> *National Register Bulletin 15.*

<sup>4</sup> *National Register 16A.*

<sup>5</sup> *California Public Resources Code Section 5024.1(a).*

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California, or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process.

### (3) California Environmental Quality Act

CEQA requires that environmental protection be given significant consideration in the decision-making process. Historic resources are included under environmental protection. Thus, any Project or action which constitutes a substantial adverse change on a historical resource has a significant effect on the environment and shall comply with the State CEQA Guidelines.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which Project impacts are considered to be significantly adverse. Specifically, a “substantial adverse change” means “demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

CEQA defines a historical resource as a resource listed in, or determined eligible for listing, in the California Register. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not a historical resource and therefore exempt from CEQA consideration. CEQA provides that a historic resource is a resource that is:

- Listed in the California Register;
- Determined eligible for the California Register by the State Historical Resources Commission;
- Included in a local register of historic resources;

- Identified as significant in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g); or
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

#### (4) Local Designation

The Los Angeles City Council designates Historic-Cultural Monuments on recommendation of the City's Cultural Heritage Commission (CHC). The City's Cultural Heritage Ordinance, Chapter 9, Section 22.171.7 of the City of Los Angeles Administrative Code, defines a historical or cultural monument as:

*[A] Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles. A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:*

- 1. 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;*
- 2. Is associated with the lives of historic personages important to national, state, city, or local history; or*
- 3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.*

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument (HCM) status. Buildings may be eligible for HCM status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria listed in the Cultural Heritage Ordinance.”

The City of Los Angeles also recognizes historic districts as Historic Preservation Overlay Zones (HPOZ).<sup>6</sup> The HPOZ is a planning tool that adds a level of protection to an

<sup>6</sup> *Los Angeles Municipal Code Section 12.20.3.*

area by creating a review board to evaluate proposals for alterations, demolitions, or new construction. An HPOZ is intended to include a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Contributing resources must meet at least one of the following criteria:<sup>7</sup>

1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or city; or
3. Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of a historic place or area of historic interest in the City.

#### (5) City of Los Angeles Historic Resources Survey (SurveyLA)

SurveyLA is the City's first comprehensive program to identify and document properties that appear to be historically significant. Surveys conducted under SurveyLA cover the period from approximately 1865 to 1980 and include individual resources such as buildings, structures, objects, natural features, and cultural landscapes, as well as areas and districts. Archaeological resources will be included in a future survey phase. Significant resources reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys commenced in 2010 and have been completed. The survey results are compiled in report format and posted on the Office of Historic Resources' (OHR) website.

As described in detail in the SurveyLA Field Survey Results Master Report, the surveys identify and evaluate properties according to standardized criteria for listing in the National Register, California Register, and for local designation as HCMs and HPOZs. 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. SurveyLA utilizes the Los Angeles Citywide Historic Context Statement to provide a framework for identifying and evaluating

---

<sup>7</sup> *Los Angeles Municipal Code Section 12.20.3 F.3(c).*

the City's historical resources. Development of the Citywide Historic Context Statement is also ongoing with oversight by the OHR.

### (6) City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan includes a Conservation Element (Conservation Element). Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes a policy to continue to protect historical and cultural sites and resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>8</sup>

### (7) Central City North Community Plan

The Central City North Community Plan includes the following objectives and policies related to cultural resources:

- Objective 17-1: To ensure that the community's historically significant resources are protected, preserved, and/or enhanced.
- Policies 17-1.1: Encourage the preservation, maintenance, enhancement, and reuse of existing buildings and the restoration of original facades.
- Objective 17-2: To encourage private owners of historic properties/resources to conserve the integrity of such resources.
- Policies 17-2.1: Assist private owners of historical resources to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.
- Objective 18-1: To enhance and capitalize on the contribution of existing cultural and historical resources in the community.
- Policy 18-1.1: Support the existing artists community in Central City North as a cultural resource for the community.

### (8) Archaeological Resources

Federal, state, and local governments have developed laws and regulations to protect significant cultural resources that may be affected by actions that they undertake or

---

<sup>8</sup> *City of Los Angeles General Plan, September 2001, Conservation Element, pp. II-6 through II-9.*

regulate. The National Environmental Policy Act (NEPA), National Historic Preservation Act, and CEQA are the basic federal and state laws governing the preservation of historical and archaeological resources of national, regional, state, and local significance. As archaeological resources are also considered historical resources, regulations applicable to historical resources are also applicable to archaeological resources. Whereas federal agencies must follow federal archaeological regulations, most projects by private developers and landowners do not require this level of compliance. Thus, as the Project would not require a federal permit and would not use federal money, federal archaeological regulations are not applicable to the Project.

*(a) California Environmental Quality Act*

State archaeological regulations affecting the Project include the statutes and guidelines contained in CEQA (Public Resources Code Section 21083.2 and Section 21084.1) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15064.5). CEQA requires lead agencies to carefully consider the potential effects of a project on archaeological resources. Several agency publications, such as the technical assistance bulletins produced by the State Office of Historical Preservation, provide guidance regarding procedures to identify such resources, evaluate their importance, and estimate potential effects.

Subdivision (c) of CEQA Guidelines Section 14 CCR 15064.5, "Determining the Significance of Impacts to Archaeological and Historical Resources," requires that:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource.
- If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria for historical resources, but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2.<sup>9</sup> If it can be demonstrated that a project may

---

<sup>9</sup> *Per subdivision (g) of PRC Section 21083.2, a unique archaeological resource means 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: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.*

impact a unique archaeological resource, Section 21083.2 states that the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. In addition, to the extent that unique archeological resources are not preserved in place or left in an undisturbed state, mitigation measures shall be required as specified in Section 21083.2. The project applicant shall provide a guarantee to the lead agency to pay one-half of the estimated cost of mitigating the significant effects. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

- If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the EIR, but they need not be considered further in the CEQA process.

CEQA recognizes that archaeological resources are part of the environment, and a project that “may cause a substantial adverse change in the significance of an historical resource [including archaeological resources] is a project that may have a significant effect on the environment” (PRC Section 21084.1). For purposes of CEQA, an historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the California Register (PRC Section 21084.1). Refer to the previous discussion in this section regarding the California Register for a list of the criteria used to determine whether a resource is eligible for listing in the California Register and is, therefore, considered an historical resource under CEQA.

Archaeologists assess sites based on all four criteria, but usually focus on the fourth criterion previously provided, which is whether the resource “[h]as yielded, or may be likely to yield, information important in prehistory or history.” The California Code of Regulations also provides that cultural resources of local significance are eligible for listing in the California Register (CCR, Title 14, Section 4852).

In addition to archaeological resources that qualify as historical resources, CEQA requires consideration of project impacts to unique archaeological resources, defined as 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 that 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 [PRC Section 21083.2(g)].

In addition to having significance in accordance with the applicable criteria, resources must have integrity for the period of significance. The period of significance is the date or span of time within which notable events transpired at a site, or the period that notable individuals made their important contributions to a site. Integrity is the ability of that property to convey its significance.<sup>10</sup>

*(b) Los Angeles General Plan Conservation Element*

Section 3 of the Los Angeles General Plan 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 historical and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>11</sup>

**(9) Human Remains**

*(a) California Environmental Quality Act*

With regard to human remains, CEQA Guidelines Section 15064.5 addresses consultation requirements if an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project site. This section of the CEQA Guidelines, Health and Safety Code Section 7050.5, and PRC Section 5097.9 also address treatment of human remains in the event of accidental discovery.

---

<sup>10</sup> U.S. Department of Interior, National Park Service, *National Register Bulletin, Guidelines for Evaluating and Registering Archaeological Properties*, 2000.

<sup>11</sup> *City of Los Angeles General Plan, Conservation Element, September 2001, pp. II-6 through II-9.*

*(b) California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8*

California law protects human remains, including Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the respectful treatment of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)).

PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission within 24 hours (Section 7050.5(c)). The Native American Heritage Commission will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by the Native American Heritage Commission. The most likely descendant may recommend means of respectful treatment of human remains and associated grave goods.

## **b. Existing Conditions**

### **(1) Historical Background of the Project Site**

The Historic Report included in Appendix E.1 of this Draft EIR includes a detailed description of the historical background and context of the Project Site and surrounding area. Below is a summary of the discussion included in the Historic Report.

As discussed in the Historic Report, the Project Site is located within the Central City North Community Plan area, in a neighborhood called Victor Heights, which is roughly bounded by Sunset Boulevard to the south, the 110 Freeway to the east, and Elysian Park to the north and west. The neighborhood was named for Victor Beaudry, the younger brother of Prudent Beaudry. Originally from Quebec, the Beaudry brothers moved to Northern California to seek their fortunes. The brothers eventually moved to Los Angeles and Prudent Beaudry served as mayor of Los Angeles between 1874 and 1876. Victor Beaudry had a variety of professional pursuits, including real estate development, a merchant, first president of the Los Angeles City Water Company, city councilman, and co-owner of the Temple Street Cable Road.

The Project Site occupies the site of the former Beaudry Park developed as a private park by Victor Beaudry. Located at the center of the Victor Heights Tract, Beaudry

Park was sold in 1883 to the Daughters of Charity of St. Vincent de Paul, who constructed St. Vincent's Sanitarium. Prior to that time, Beaudry Park was said to have been planted with "a veritable forest of fruit and ornamental trees," although historic photos of St. Vincent's Sanitarium do not show such a forest. In 1913, St. Vincent's Sanitarium became the first in California to be accredited by the American College of Surgeons. St. Vincent's Sanitarium opened a new facility in the Westlake neighborhood of Los Angeles in 1927. The new hospital was constructed just as a fire earlier that year had damaged the north wing of St. Vincent's Sanitarium. St. Vincent's Sanitarium was demolished, and the site remained generally vacant, with the exception of a 36-unit apartment building at the east side of the site, until the Project Site was acquired by the Metropolitan Water District (MWD) for development of its headquarters.

MWD's headquarters ultimately included four structures, as identified in Figure II-2 in Section II, Project Description, of this Draft EIR. As shown therein, these four structures included the MWD Courtyard Building (Building 1), located generally in the northern portion of the Project Site, the MWD Bridge (Building 2), the MWD Admin Building (Building 3), located generally in the southern portion of the Project Site, and the MWD Annex (Building 4), located along the northernmost portion of the Project Site.<sup>12</sup> MWD initially constructed Buildings 1, 2, and 3, which were completed in 1963. By the time MWD moved into their new headquarters in 1963, MWD had already outgrown the new headquarters, requiring MWD to lease additional office space nearby. This solution was not optimal and prompted MWD to construct an office tower annex (Building 4, MWD Annex), which was completed in 1973. All four buildings were designed by William Pereira and Associates. MWD occupied the Project Site until 1993 and, in 1994, the property was transferred to Holy Hill Community Church.

Holy Hill Community Church used Buildings 1, 2, and 3, while Building 4 remained vacant, and constructed the last of the existing on-site buildings (Building 5),<sup>13</sup> which appears as an extension of Building 2 and is situated between Buildings 1 and 3 and used as the church's new sanctuary. The Holy Hill Community Church experienced financial troubles and were prompted to subdivide and create an airspace parcel (Parcel A) that now contains the general envelope of Building 4; thereby rendering the remainder of the Project Site as Parcel B (1111 Sunset Boulevard). In 2011, the Holy Hill Community Church sold Parcel A, and in 2014 declared bankruptcy and vacated Parcel B. The four existing buildings within Parcel B at 1111 Sunset Boulevard (Buildings 1, 2, 3, and 5) are currently vacant and comprise the Project Site. Building 4 at 1115 Sunset Boulevard, known as the

---

<sup>12</sup> *The Historic Report identifies the MWD Courtyard Building (Building 1) as Buildings 3a and 3b, the MWD Bridge (Building 2) as Building 2, the MWD Admin Building (Building 3) as Building 1, and the Elysian apartment building (Building 4, also known as the MWD Annex) as Building A.*

<sup>13</sup> *The Historic Report identifies the church addition as Building 4.*

Elysian apartment building, which began conversion to a residential use in 2007, is currently occupied by 96-unit residential apartments above a ground floor restaurant. While the Elysian apartment building is part of the Project Site, it is not included as part of the Project work scope.

## (2) Historical Context of the Project Site

Based on the historical background of the Project Site, the following historical contexts, as defined by SurveyLA, apply to the Project Site: Public and Private Institutional Development, 1850–1980, with the subcontext Government Infrastructure and Services, 1850–1980, and theme Municipal Water and Power, 1916–1980; and Architecture and Engineering, 1850–1980, with the subcontext L.A. Modernism, 1919–1980, and theme Post-War Modernism, 1946–1976. Additional themes are represented by potential archaeological deposits at the Project Site, including healthcare and medicine, religion and spirituality, industrial development (specifically oil and petroleum exploration and production), and multi-family domiciles.

### (a) *Beaudry Park*

The hills north of Los Angeles were among those outlying areas of interest to speculators in the years leading up to the southern California real-estate boom of the 1880s. Canadian brothers Prudent and Victor Beaudry speculated in Los Angeles real estate on a large scale. Within Victor Heights, which was named for Victor Beaudry, on the knoll of the Elysian Hills comprising the Project area, Beaudry developed a park in 1873. The park was designed by landscape gardener F. Tamiet, who also designed the City Plaza. By 1881, Beaudry Park reportedly contained some 5,500 trees, fountains, and drives. In 1883, Victor Beaudry transferred ownership of the park property to the Sisters of Charity. Additional information regarding Beaudry Park was presented in the Archaeological Report prepared for the Project (see Appendix E.2 of this Draft EIR).

### (b) *Los Angeles Infirmary/Sisters' Hospital/St. Vincent's Hospital*

The following summary of the Project Site during the tenure of the Sisters of Charity is drawn from the Archaeological Report (see Appendix E.2 of this Draft EIR). The Sisters of Charity built a brick hospital on their property at the former Beaudry Park. The architectural firm of Kysor and Morgan designed the building, which had five towers, six communal wards, and 60 private rooms. Initially, it served largely as a sanitarium for respiratory patients and, under contract, for railroad workers injured on the job. Later, maternity care and other specialties were added. The hospital operated as a nurse training facility. In 1902, construction was completed on a new west wing for the hospital; the contractor for the addition was George Booth.

In addition to the hospital itself, the facility at various times included laundry buildings, a water tank, furnace, coal shed, carpenter shop, billiard room, summer houses, outpatient clinic cottages, nurses' residences, and other outbuildings. Extensive landscaping improvements were completed on the grounds, which contained trees, flower beds, semi-tropical plants, fountains, and a small lake.

Various historical aerial photographs and maps dating between 1923 and 1950 indicate a "shrine" within the Project area. The small structure had the appearance of a miniature church, with a cross on the roof over the door. It was constructed of concrete or cement block, and was situated in a landscaped area, enclosed by a circular path.

In 1927, a fire in the hospital caused considerable damage, and reduced capacity. Later that year, the hospital moved into a new building in the Westlake District of the City.

E. L. Doheny's 1892 oil discovery led to a drilling boom on Los Angeles town lots. The Los Angeles City Oil Field became the biggest producer in the state. The field ran in a roughly westerly direction for approximately 4.5 miles from Elysian Park.

The Project area marks the western extent of the East Field portion of the Los Angeles City Oil Field. The first well was drilled in the East Field in late 1896, about 0.75 mile east of Project area. In the area, wells were drilled using derricks, and nearly all required pump jacks to bring oil to the surface. Because the Los Angeles City Field was in an urbanized area lacking pipelines and rail connections, the extracted oil was used locally for fuel.

Reportedly, two wells had been drilled and abandoned in the Project area east of the hospital by 1897. After first protesting drilling applications in the vicinity of the hospital, the Sisters of Charity leased oil rights in 1900. Maps dated 1904 and 1906 depict eight and six wells in the southern and southeastern edges of the Project area, respectively. The Sanborn Fire Insurance Company map dated 1906 and updated in 1952 revealed some mapped features that had been pasted over at an unknown time between those dates. These included three oil wells and two oil tanks along the southern Project boundary, and another oil well and an illegible feature in the interior of the property. A 1923 aerial photograph reveals the locations of three oil derricks, represented by long, triangular shadows at the southeastern edge of the Project area. The online Well Finder database provided by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources lists six wells drilled within the Project site area.

*(c) 1930s–1950s Apartments*

Various maps, aerial photographs, and other archival research indicate that, after demolition of the hospital building, one building fronting on Alpine Street remained in use as an apartment building until at least 1958. Details regarding this period in the Project area were presented in the Archaeological Report (see Appendix E.2 of this Draft EIR).

*(d) Metropolitan Water District*

As discussed in the Historic Report included in Appendix E.1 of this Draft EIR, MWD was founded in 1928 with the main goal of bringing water from the Colorado River to the Los Angeles basin and its environs, in order to meet increasing water demands for a growing population. MWD began as a small, regional public entity that grew gradually during the 1930s and 1940s, before annexing “most of Southern California into its service territory” after World War II. Southern California’s exponential population growth and increasing demand for water led to the rapid expansion of MWD projects and personnel, leading the agency to construct a new headquarters at the Project Site in 1961.

Like many other early Los Angeles public agencies, MWD began as a regional partnership between the City of Los Angeles and roughly 12 other Southern California cities. Initially, MWD was charged with financing and building the Colorado River Aqueduct, a 242-mile “engineering marvel that once was the longest and most expensive aqueduct in the world.” As a result of Southern California’s rapid economic, housing, industrial, and population growth in the decades after World War II, MWD began a “major system expansion” in 1952 that would help meet heavily increased water demand.

Because growth of MWD’s projects and personnel during the 1940s and 1950s showed no signs of slowing, MWD’s Board of Directors commissioned a survey to study the construction of new MWD headquarters. The Headquarters Survey, issued in 1958, studied MWD’s requirements for potential locations and concluded that the new headquarters office building should be constructed in Downtown Los Angeles near the Civic Center. MWD chose the Project Site for several reasons: transportation convenience, parking facilities, relative accessibility of the site by visitors, room for future expansion, and “prestige and dignity of location.” However, probably the most important factor was close proximity to the hub of business and government in Los Angeles in order to facilitate “easy contact among the management and governmental agencies of the community.” Thus, the choice of the Project Site can be seen as part of a broader civic effort to centralize government, business, and cultural spaces through new construction.

In addition to the agency’s regular operations during the 1960s, MWD would also come to play a central role in providing “vital support” for the State Water Project, which led to additional need for personnel and office space. The State Water Project was the first

phase of the California Water Plan, “a long-range comprehensive program for the coordinated development and beneficial use of the water resources of the State.” After much study of possible options, MWD’s Board of Directors voted to construct an eight-story adjoining office tower (Building 4) on the Project Site, designed by William Pereira and Associates, which opened in 1973.

During the 1990s, MWD continued to grow as it responded to ever-increasing population growth and water demands. As MWD’s operations and personnel continued to grow, the agency once again required more office space. MWD moved out of their headquarters at the Project Site in 1993, relocating to office space at downtown’s California Plaza until a new headquarters was built next to Union Station. MWD remains “a global leader in water resources management and diversification, conservation efforts, and reclamation. MWD now serves as the region’s de facto water policymaker, promoting storage” for dry-year use, “as well as providing financial incentives for member-agency local projects such as conservation, reclamation, and desalination.”

*(e) William Pereira and Associates*

As described in the Historic Report included in Appendix E.1 of this Draft EIR, William Leonard Pereira (1909–1985) was an important Los Angeles architect in the postwar period. Though his buildings were often quite stark and sterile in their appearance, they were noted for their functional style with a certain flair that made them unmistakable. Remarkably prolific, he was known for his style of architecture, which came to define the look of mid-20th century America. He is credited for a huge number of architectural and urban design projects and may be best known for the Transamerica Building in San Francisco (1973), LAX Theme Building (with Paul R. Williams and Welton Becket, 1957–1961, HCM #570) (“Theme Building”), and the master plan for Irvine Ranch (1961).

Pereira was born in Chicago and graduated from the University of Illinois in 1930. In 1934, he received a commission by the movie theater chain Balaban and Katz, which was owned by Paramount. Paramount Pictures then hired him as an architect and art designer and brought him to Los Angeles in 1938. Pereira established his own architecture firm in Los Angeles around 1940.

Hearing that his former classmate from University of Illinois had left Lever Brothers, William Pereira invited Charles Luckman to form a Los Angeles-based architecture firm. By 1955, Pereira and Luckman had 400 employees and more than \$500 million in projects in progress. In addition to the buildings noted above, Pereira and Luckman are responsible for the designs of CBS Television City in Los Angeles (1952), Robinson’s Department Store in Beverly Hills (1952), Disneyland Hotel in Anaheim (1958), United States Air Force and Naval Base in Cadiz, Spain (1956), and Nellis Air Force Base in Las Vegas (1957).

William Pereira and Charles Luckman split in 1958 over a disagreement between approaches in architectural and marketing practices.

In 1958, William Pereira reorganized his practice as William L. Pereira and Associates, Architects and Planners. By 1970, he had promoted three additional principals, Gin D. Wong, James H. Langenheim, and James M. Sink.

Design of the three initial buildings at the Project Site for MWD can be attributed to James H. Langenheim. James Hay Langenheim (1921–2010), joined Pereira and Luckman in 1951, the same year he graduated from the University of Southern California (USC). As provided in the Historic Report included in Appendix E.1 of this Draft EIR, during his time at Pereira and Luckman, James Langenheim was promoted from vice president to partner of the Pereira firm, which indicated he shared “design responsibility for Disneyland Hotel, Convair Astronautics and General Atomics in San Diego, the new IBM Building in Los Angeles, Robinson’s–Palm Springs, Beckman Helipot, the Chrysler Training Center in Santa Ana and Prudential Center in Boston, among others.” In addition, he was partner-in-charge of design of the Los Angeles County Museum of Art (LACMA) and it is rumored that he created the original design of the LAX Theme Building, a distinctive white building that resembles a flying saucer landing on its four legs. After leaving the firm, James Langenheim moved to Archisystems, where he served as vice president of architecture and design. One of his first projects was reconstructing the Desert Inn and County Club in Las Vegas (1978). The same year, he began design on the Fashion Show mall in Las Vegas. In the 1980s, as principal of James Langenheim & Associates, he designed Aaron and Candy Spelling’s 56,500 square-foot Chateausque mansion in Los Angeles.

*(f) Robert Herrick Carter & Associates*

Landscape features on the Project Site were designed by the prolific landscape design firm Robert Herrick Carter & Associates. Robert Herrick Carter (1920–1989) was a pioneer landscape architect in California. A native of Los Angeles, Carter studied architecture at USC, where he also played football, before opening his nursery in 1948, Van Herrick’s Environmental Planting, which focused on providing interior plants for rental.

Carter founded the landscape design firm Robert Herrick Carter & Associates in the 1950s. One of his first, notable projects was the Union Oil Headquarters with William Pereira & Associates, completed in 1960. Carter designed the interior atrium to change every few months with the seasons. Carter saw his role as integrating architecture and landscape. Carter’s firm was prolific, even though there were never more than six or seven landscape designers at one time. The firm typically worked in close collaboration with the design architect.

In addition to the more corporate projects, Carter designed the landscape for the William Pereira residence as well as the David E. Bright residence that incorporated the owners' sculpture collection. Carter often incorporated water features into his landscape, as seen in his work at MWD, as well as LACMA, the Cinerama Dome, and his residential projects. He was awarded numerous awards from the Los Angeles Beautiful Committee and a 1975 honor from American Association of Nurserymen for his design of the stepped rooftop garden at Lindner Plaza.

*(g) .A. Modernism: Post-War Modernism, 1946–1976*

Post-War Modernism was a continuation of Modern movements and is an amalgamation of architectural expressions from the earlier periods, including the International and Bauhaus styles. Modernism became the pre-eminent design solution from about 1932 to about 1984 for commercial and institutional buildings and Los Angeles became a center of innovation, attracting designers from all over the world. Los Angeles-based Modernist architects of the pre-WWII and Depression era such as Lloyd Wright, Richard Neutra, and Claud Beelman were joined by emerging architects of the Modern movement, such as Welton Becket, Raphael Soriano, William Pereira, and Craig Ellwood.

Various styles of Post-War Modernism are characterized by a simplification of form and elimination of ornament. Most examples have flat roofs, deep roof overhangs, and a mix of masonry and glass exterior cladding. The Project Site combines elements of Post-War Modernism with New Formalism. Common features of New Formalism include use of travertine, marble, and granite; buildings set on a podium; use of arches, colonnades, classical columns; smooth wall surfaces; and formal landscape with use of pools, fountains, and sculptures. Expression of New Formalism within the Project Site can be seen in its use of concrete sunscreens over expanses of glass and a landscaped plaza with fountains.

Eligibility criteria established by SurveyLA for the subtheme Corporate International, 1946–1976 for an institutional property type are:

- Box-shaped form
- Constructed of concrete, steel and glass
- Flat roofs, either with flush eaves or cantilevered slabs
- Horizontal bands of flush, metal-framed windows, or curtain walls
- Lack of applied ornament

- Articulated ground story, often double-height and set back behind columns or pilotis
- Integral parking lot, either subterranean or above grade
- Landscaped plaza or integral plantings at ground floor

### (3) Historic Designations

A nomination as an HCM for the Project Site that included Building 4 was considered by the CHC in September 2015. However, the CHC did not achieve a majority vote for designation. The Project Site was therefore not declared an HCM. The Project Site is not listed in the National Register or the California Register.

SurveyLA published findings for the Central City North Community Plan Area in September 2016. The Project Site was considered a potential historic district, including the existing Elysian apartment building at 1115 Sunset Boulevard and the parking garage located at 1040 Alpine Street. While identifying the complex, SurveyLA did not evaluate it, remarking, “The property has undergone substantial modifications over time. Due to these alterations, more research is needed to determine if the property retains sufficient integrity to convey its significance.... Therefore, the evaluation could not be completed.” The Historic Report prepared for the Project, included in Appendix E.1 of this Draft EIR, provides such additional research and analysis and concludes that the Project Site is not a historical resource, as discussed further below.

### (4) Adjacent and Nearby Properties

#### *(a) Angelino Heights*

Angelino Heights Historic Preservation Overlay Zone (HPOZ) is located across Sunset Boulevard from the Project Site. The Angelino Heights HPOZ was established in 1981 as the first locally designated historic district in the City of Los Angeles. Angelino Heights’ historic character is rooted in its founding as one of the City’s first suburbs, established in 1886. Two brothers, Prudent and Victor Beaudry, laid the groundwork for the development of the area. The popularity of Angelino Heights in the 1890s was due to the need for a residence with close “proximity to work, commerce and recreation, along with the... exclusivity of an area.” Angelino Heights fit the bill because it was similar to Bunker Hill in its views and terrain, and slightly farther from, yet still close enough, to easily travel to the city center. The neighborhood’s historic character is owed, in part, to its place as home to burgeoning film industry stars Mary Pickford and Gloria Swanson, and as the scene for Keystone Cops chase scenes.

Angelino Heights is primarily residential, dotted with a church and a few small stores. The streets throughout its hilly terrain are laid out primarily in a curvilinear style, rather than a grid. The homes are a mix of Victorian-era architecture dating to the 1890s, Craftsman style bungalows from the 1910s, a few Spanish Colonial Revival homes, as well as more recent construction. Angelino Heights retains a uniquely Victorian-era atmosphere due to a banking recession in 1888 that slowed construction. By the time “prosperity returned in the late 1890s, other areas had become more prominent.” Between 1900 and 1915, a second wave of development lent itself to the newly popular Craftsman style of architecture. As described in the Historic Report included in Appendix E.1 of this Draft EIR, Angelino Heights has remained separate from surrounding neighborhoods because of its hilly terrain and its geographical position, “bordered by Echo Park to the west, the Hollywood Freeway to the south, and Sunset Boulevard on the north.” As distant suburbs became more popular throughout the twentieth century, the Angelino Heights neighborhood “sank into obscurity, unrecognized by the great majority of Angelenos.”

Preservation of the neighborhood was driven in part by the controversy surrounding the large-scale demolition of nearby Bunker Hill during the 1950s, which prompted a number of Angelenos to protect and restore some of downtown’s oldest homes. The Angelino Heights HPOZ was adopted by the City Council in 1983. Located within the HPOZ, the 1300 block of Carroll Avenue is listed in the National Register of Historic Places and contains the highest concentration of 19th century Victorian homes in Los Angeles.<sup>14</sup> The Angelino Heights HPOZ has no relationship to Sunset Boulevard, which sits just outside the Zone’s northeast border. The Project Site is generally not visible from the Angelino Heights neighborhood, although the 1973 office tower annex (Building 4), is visible from a few intersections on East Edgeware Road.

### *(b) Victor Heights*

As discussed in the Historic Report, Victor Heights is roughly bounded by Sunset Boulevard to the south, the 110 Freeway to the east, and Elysian Park to the north and west. The neighborhood was named for Victor Beaudry, the younger brother of Prudent Beaudry. Like Angelino Heights, Victor Heights was established in 1886 through the sale and subdivision of property owned by Victor Beaudry. Victor Heights is situated on similarly hilly terrain overlooking Bunker Hill, the downtown financial district and the Los Angeles Civic Center. The neighborhood is composed of both curvilinear and grid patterned streets and contains a mix of single- and multi-family residences.

---

<sup>14</sup> City Office of Historic Resources, *Angelino Heights*, <https://preservation.lacity.org/hpoz/la/angelino-heights>, accessed February 10, 2021.

As previously noted, the Project Site occupies the site of the former Beaudry Park. Victor Heights has not been designated as an HPOZ, likely due to the broad range of architectural styles representing a number of periods. These include large Victorian-era homes built at the turn of the 20th century, 1920s Spanish Colonial Revival structures, and 1980s multi-family residential buildings. The neighborhood is currently experiencing a construction boom with a handful of newly completed multi-family residential buildings. Most of the earlier residences have been substantially altered.

SurveyLA identified two residences, 1021 West Alpine Street and 1027 North Alpine Street, as appearing eligible for individual designation. Both properties are located approximately a half block to the east of the Project Site. The residence at 1021 West Alpine Street was identified by SurveyLA as an “excellent and rare example of a Craftsman bungalow in Central City North; residence predates much of the surrounding development by [a] decade or more.” The residence at 1027 North Alpine Street was identified as an “excellent and intact example of early residential development in Central City North; residence predates much of the surrounding development by [a] decade or more.” SurveyLA also described the residence at 1027 North Alpine Street as an “excellent example of Vernacular Hipped Cottage in Central City North.” One other property in Victor Heights was identified in SurveyLA, 1013 West Alpine Street, located at the corner of West Alpine Street and Centennial Street. SurveyLA identified the building as locally eligible under Criterion A/1/1<sup>15</sup> as the “long-term location of an Italian neighborhood market, a rare remaining remnant of Los Angeles’ Little Italy which is no longer extant.”

The survey report for SurveyLA Central City North Community Plan Area notes that “Central City North was the symbolic cultural center for a number of the region’s most prominent ethnic groups, encompassing Chinatown, parts of Little Tokyo, parts of the original Mexican pueblo, and Little Italy.” The survey report identifies St. Peter’s Italian Catholic Church at 1039 North Broadway, as the “heart of what was then Little Italy.” The church is over a mile to the northeast of the Project Site, suggesting that the I-110 Freeway separated a small section of the former Little Italy neighborhood in Victor Heights from the main portion. Despite the neighborhood’s cultural significance, the Historic Report determined that no potential historic district exists within the Victor Heights neighborhood.

---

<sup>15</sup> As detailed above in the Regulatory Framework, the eligibility criteria for listing on the National Register, the California Register, and as a local HCM designation align to a large degree with the eligibility criteria at each level of listing. The National Register identifies the criteria for listing as letters (A-D) while the California Register and the local HCM identify the criteria in numbers. The Criterion A/1/1 therefore refers to the National Register, California Register, and local HCM criteria for listing related to a building’s or property’s association with events that have made a significant contribution to the broad patterns of American history and cultural heritage.

(c) *Everett Park*

Just outside the Angelino Heights HPOZ and immediately to the west of the Project Site sits Everett Park, a small grassy area dotted with a few trees that sits at the top of steep, loop-shaped Everett Street. Everett Park was historically part of Angelino Heights, circa early 1900s, but eventually became separate from that neighborhood, possibly due to increasing development along Sunset Boulevard. Like the Angelino Heights HPOZ, the tract was subdivided in the 1880s; however, this particular tract was subdivided by William Stilson and Everett E. Hall. The street takes its name from Everett E. Hall. A number of homes on Everett Street date to the early 1900s. Two are identified in SurveyLA as appearing eligible for designation: 980 North Everett Street and 1001 North Everett Street. The former was identified as appearing significant as an “excellent example of a Craftsman residence. Very intact. Exhibits quality of design through distinctive features.” The residence at 1001 North Everett Street was identified as significant as a “rare, intact example of early residential development in the area; most examples from this period do not retain integrity” as well as an “excellent, unique example of Neoclassical stylistic influences applied to a residential building.” Since SurveyLA was completed for this area in 2014, the residence at 1001 North Everett Street was listed as a local Historic-Cultural Monument (HCM #1110). While there are historic resources within Everett Park, as discussed in the Historic Report, no potential historic district was identified around Everett Park.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, 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?***

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

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

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

### (1) Historical Resources

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic 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 (historical/architectural) 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 historic resource. The Secretary of the Interior's 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 then for the federal rehabilitation tax credit. See 36 Code of Federal Regulations Section 67.7. Similarly, the Cultural Heritage Ordinance provides that compliance with the Secretary of the Interior's Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to Historic-Cultural Monuments. See Los Angeles Administrative Code Section 22.171.14.a.1. Therefore, the Secretary of the Interior's Standards are used for regulatory approvals for designated resources but not for resource evaluations. Similarly, CEQA recognizes the value of the Secretary of the Interior's 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 Secretary of the Interior's Standards. See State CEQA Guidelines Section 15331 and 15064.5(b)(3).

According to Appendix G of the State CEQA Guidelines, the threshold of significance is whether a project causes a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5. That section provides a detailed definition of "substantial adverse change." In summary, the definition of substantial adverse change and, hence, the threshold of significance is whether a project

demolishes or materially alters in an adverse manner the physical characteristics that convey historical significance of the resource or that justify its eligibility for the California Register of Historical Resources or a local register such as the list of HCMs. In other words, if a project would render an eligible historic resource ineligible then there would be a significant adverse effect under CEQA.

This refinement to the factors listed in the City's L.A. CEQA Thresholds Guide has been reviewed and concurred with by the City Planning Department's Office of Historic Resources.

## (2) Archaeological Resources

- If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:
  - Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
  - Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
  - Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
  - Is at least 100 years old<sup>16</sup> and possesses substantial stratigraphic integrity; or
  - Involves important research questions that historical research has shown can be answered only with archaeological methods.

## b. Methodology

The Historic Report provided in Appendix E.1 of this Draft EIR is based, in part, on historic permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, primary and secondary historical accounts, as well as review of the National Register, the California Register, and the Los Angeles Historic Resources Survey to identify any previously recorded properties within or near the Project Site. Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a

---

<sup>16</sup> *Although the CEQA criteria state that "important archaeological resources" are those which are at least 100- years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.*

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.

### **c. Project Design Features**

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

### **d. Analysis of Project Impacts**

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. As the differences in the land use mix under the two development scenarios do not affect the analytics related to cultural resources, the analysis of potential impacts associated with cultural resources provided below accounts for both development scenarios and the term “Project” is used.

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

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

##### ***(a) Evaluation of Historic Significance***

##### ***(i) Project Site***

As discussed in the Historic Report, since the eligibility criteria for local HCM designation align in large degree with the eligibility criteria of the National Register and the California Register, the following evaluation considers eligibility under each of the criteria at the federal, state, and local levels under a single heading. For a property to be considered

a historical resource under CEQA, it need only appear eligible for designation under one criterion.

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

According to the Historic Report, the Project Site appears significant for its association with MWD. Much of the history of Los Angeles connects to the history of water: acquiring it, moving it, distributing it, processing it. Four of the buildings at the Project Site were constructed for MWD as their headquarters, and MWD occupied the buildings between 1963 and 1993. Although eligibility criteria established for SurveyLA for Administration Buildings associated with the theme Municipal Water and Power, 1916–1980, specifically calls out association with Los Angeles Gas and Electric Corp., Bureau of Power and Light, and the Department of Water and Power, MWD appears equally significant, if not more important to all of Southern California than those organizations. Therefore, the Project Site would have appeared eligible under Criterion A/1/1 with a period of significance of 1963, the year MWD moved to the Project Site, until 1993, the year MWD moved out. However, as discussed below, due to losses of integrity, the Project Site is no longer able to convey its significance for its association with MWD and is, therefore, not a historical resource for purposes of CEQA.

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

As a large municipal organization, few, if any, specific individuals can be associated with the Project Site and none rise to the level required to warrant consideration under Criterion B/2/2.

*Criterion C/3/3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values*

When constructed, Buildings 1, 2, and 3 at the Project Site were excellent examples of Post War Modernism, combining Corporate Modernism with elements of New Formalism. Significant, character-defining features of the three, interconnected buildings included the large, pierced concrete screens on Buildings 1 and 3, as well as fountains and water features along the south and west elevations. Other character-defining features of the buildings were their box-like forms; construction of concrete, steel, and glass; flat roofs; lack of ornamentation; horizontal bands of windows; cantilevered balconies; and distinctive fins. Designed by the prominent architecture firm of William Pereira and Associates, Buildings 1, 2, and 3 are also significant for their association with the work of a creative individual and for its landscape design by the firm of Robert Herrick Carter and Associates. While the three buildings and landscape design, at one time, may have been significant under Criterion C/3/3 with the period of significance of 1963, given the series of alterations

the buildings have undergone, the character-defining features have been lost. In particular, as described in the Historic Report, construction of Building 5 destroyed all sense of the relationship Buildings 1, 2, and 3 had with each other as well as significant landscape features. As such, the three buildings and landscape lack integrity and are no longer able to convey that significance. Building 4 (now the Elysian apartments) continued design idioms of the three earlier buildings and could also have been individually significant under Criterion C/3/3 with the period of significance of 1973, the year it was completed. However, due to recent construction activities and additions, this building also lacks integrity and is not able to convey that significance.

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

The Project Site cannot be reasonably expected to yield information important in prehistory or history; therefore, it is not eligible under Criterion D/4.

#### Historic District

The Project Site, including Building 4 and the parking structure at 1040 Alpine Street, was considered a potential historic district in SurveyLA under two criteria: Criterion A/1/1, “significant as a rare complex of 1960s–1970s institutional development associated with the growth and consolidation of the Metropolitan Water District of Southern California (MWD)” and Criterion C/3/3, “significant as the work of master architect William L. Pereira, designed in 1961 in the Mid-Century Modern style.” However, findings of SurveyLA were inconclusive, noting that “[t]he property has undergone substantial modifications over time. Due to these alterations, more research is needed to determine if the property retains sufficient integrity to convey its significance.” As noted below, the buildings at the Project Site lack substantial integrity and can no longer convey their significance, neither as the headquarters of MWD nor for its association with William L. Pereira. Therefore, the grouping of buildings does not appear eligible as a historic district.

#### Integrity

For a property to be eligible for designation at the local, state or national level, it must meet at least one eligibility criterion listed above as well as retain sufficient integrity to convey that historic significance. Integrity is defined as physical and visual characteristics of a property necessary to convey its significance. The seven aspects of integrity are *Location, Design, Setting, Materials, Workmanship, Feeling, and Association*. To satisfy the integrity requirement, a property must retain at least a majority of the seven aspects of integrity. The following describes how the Project Site does or does not meet each of the seven aspects of integrity:

- *Location*: The Project Site retains integrity of location as none of the buildings appear to have moved or been moved to the Project Site.
- *Design*: Buildings 1, 2, 3, and 4<sup>17</sup> at the Project Site appear to have been substantially altered since they were constructed. Some of the most visible alterations include:
  - Building 1: Removal of all pierced, concrete screens at north and south elevations; removal of all concrete balcony railings; removal of north elevation at west side; replacement of some fenestration; removal of signage at west elevation; degradation of pools; loss of historic fabric in board room and cafeteria.
  - Building 2: Removal of west elevation, including entry walkways, fountains, and other water features; removal of east elevation entry canopy; excavation of east elevation to create a new main entrance; addition of parapet at east elevation; removal of main entrance from second floor to first floor; change of circulation pattern; replacement of fenestration at east elevation; removal of fenestration at west elevation.
  - Building 3: Removal of all pierced, concrete sunscreens at west and east elevations and within courtyard; removal of all concrete balcony railings; replacement of some fenestration; removal of south elevation at west side; removal of pools west of Building 3.
  - Building 4: Replacement of all fenestration; addition of two-story penthouse; removal of all concrete balcony railings; extension and fusing together of paired fins; addition of wide overhanging cornice; new interior finishes and spaces; addition of water features at entrance.
  - Landscaping: Character-defining features of the landscape, hardscape and site, including retaining walls, designed by Robert Herrick Carter have been lost over time, specifically by construction of Building 5 and excavation of the east entrance. All pools and fountains were demolished and the gently sloping grassy knoll at the east entrance was removed. Remnants of some pools remain at the south elevation, but their size and shape have also been altered over time to accommodate use for children’s play equipment. A small pool, not original to the MWD construction or part of Robert Herrick Carter’s design, was added to Building 4 as part of the 2013 renovation. Planters in the landscaped triangle that separate Sunset Boulevard from North Beaudry Avenue also appear to post-date Carter’s design.

---

<sup>17</sup> *The Historic Report identifies the MWD Courtyard Building (Building 1) as Buildings 3a and 3b, the MWD Bridge (Building 2) as Building 2, the MWD Admin Building (Building 3) as Building 1, and the Elysian Building (Building 4, also known as the MWD Annex) as Building A. The Historic Report identifies the church addition (Building 5) as Building 4.*

Given all of the alterations described above, the Project Site lacks integrity of design and cannot convey any of its original design intent.

- *Setting*: Integrity of setting is defined as the relationships between buildings and open space. Construction of Building 5 removed all sense of the relationship of Buildings 1, 2 and 3 had with each other as well as significant landscape features, including water features such as fountains and pools and a gently sloping grassy knoll. In addition, construction of Building 5 changed access to the complex, removing the entry along the west elevation and reconfiguring the entry along the east elevation. Therefore, the Project Site does not retain integrity of setting.
- *Materials*: The Project Site does not retain integrity of materials given the substantial alterations to almost all buildings, specifically loss of all pierced, concrete sunscreens and concrete railings along balconies as well as loss of water features. In addition, with the exception of some areas of original tile flooring, almost all interior finishes have been removed, including those in the former board room and cafeteria. Therefore, the Project Site lacks integrity of materials.
- *Workmanship*: Loss of materials has resulted in loss of integrity of workmanship, or evidence of artisans' labor and skill in constructing or altering a building.
- *Feeling*: Because the Project Site has lost integrity of setting, design, materials, and workmanship, as discussed above, the Project Site does not retain integrity of feeling, which is defined as a property's expression of the aesthetic or historic sense of a particular period of time resulting from the presence of physical features that, taken together, convey the property's historic character.
- *Association*: The Project Site does not retain integrity of association, which refers to the direct link between an important historic event and/or person and a historic property. With the addition of Building 5, loss of most water features and refurbishment of Building 4, the Project Site no longer conveys any sense of its former association with MWD.

As evaluated in the Historic Report, given the extensive alterations to all the buildings and landscape, specifically as a result of construction of Building 5, it would not be possible to bring the Project Site back to anything resembling what it was when it was occupied by MWD without extensive reconstruction. However, an evaluation of integrity must be based on a building's current physical state rather than anticipation of future restoration or reconstruction of visual character. National Register guidance indicates that a reconstructed property is eligible for designation only if it is an accurate reconstruction; i.e., historic drawings would need to be replicated exactly, using historic materials. In addition, a reconstruction is only eligible if "no other building, object, or structure with the

same association survives.” While MWD occupied the Project Site for 30 years, it also occupied the still-extant Million Dollar Theater for approximately 35 years prior to that time.

As determined in the Historic Report, the Project Site was found significant for its association with MWD, as well as for its distinctive architecture designed by the important firms of William Pereira and Associates and Robert Herrick Carter and Associates. However, as concluded in the Historic Report, due to its numerous and extensive alterations, additions, and removal of almost all character-defining features, the Project Site does not convey sufficient integrity to convey that significance and therefore is not eligible for listing in the National Register or the California Register or as a local HCM. Therefore, it is not a historical resource as defined by CEQA.

### *(ii) Project Site Vicinity*

As discussed in the Historic Report and summarized above, there are two designated historical resources in the vicinity of the Project Site, the Angelino Heights HPOZ and the residence at 1001 Everett Street. There are also three properties that were identified in SurveyLA as appearing eligible for designation. These three properties are treated as historical resources for purposes of this analysis.

### *(b) Potential Direct Impacts to Historical Resources*

The Project would require the demolition of the existing vacant buildings on the Project Site. The Project would not remove the existing Elysian apartment building. As determined in the Historic Report, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removing existing on-site vacant buildings would be less than significant.

### *(c) Potential Indirect Impacts to Adjacent Historical Resources*

Located east of Sunset Boulevard, the Angelino Heights HPOZ is situated across Sunset Boulevard from the Project Site and the Carroll Avenue National Register-listed historic district is located approximately 0.5 mile away from the Project Site. While there are very limited views to the Project Site from a few areas within the northeastern side of the Angelino Heights HPOZ, specifically a few intersections on East Edgeware Road, it is generally visually disconnected to the HPOZ. As discussed in the Historic Report, while the Project would be visible from the Angelino Heights HPOZ, it does not impact the integrity of the residential buildings within the HPOZ nor does it impair in any way the features that convey the historic district’s significance.

Similarly, the Project would not impact the residence at 1001 Everett Street, which is located at the top of a hill, overlooking the Project Site. It was designated an HCM as an

example of the Neoclassical Revival style. As discussed in the Historic Report, while the Project would be visible from 1001 Everett Street, the Project would not diminish its architectural design or integrity, the reason for its significance.

Finally, the three buildings in the Victor Heights neighborhood that were identified in SurveyLA as appearing eligible for designation would not be impacted by the Project. Two of the three properties, 1021 West Alpine Street and 1027 North Alpine Street, were identified as appearing eligible for their architectural design. The third property, 1013 West Alpine Street, was identified as significant for its association with the Little Italy neighborhood. As concluded in the Historic Report, the Project would not diminish the architectural design of the properties located at 1021 West Alpine Street and 1027 North Alpine Street or impact the association between the property located at 1013 West Alpine Street and the Little Italy neighborhood, the reasons for their significance.

*(d) Conclusion*

**Based on the above, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. As such, impacts to historical resources would be less than significant.**

**(2) Mitigation Measures**

Project-level impacts related to historical resources would be less than significant. Therefore, no mitigation measures are required.

**(3) Level of Significance After Mitigation**

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

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, based on a records search conducted by the South Central Coastal Information Center (SCCIC), there are five cultural resources mapped by the SCCIC within a quarter mile of the Project Site. One of the five cultural resources includes the Holy Hill Community Church/MWD Complex located within the Project Site. According to the Archaeological Report (see Appendix E.2 of this Draft EIR), construction of the MWD Sunset Boulevard Headquarters Campus and the Holy Hill Community Church buildings likely destroyed

subsurface remains of historical-period and prehistoric activities within the footprints of the buildings, particularly where basements were excavated. However, there is a potential for the presence of intact archaeological remnants outside the current building footprints and throughout the remainder of the Project Site.

Specifically, the analysis found that parts of the Project to the west, south, and southeast of existing buildings have moderate to high sensitivity for the presence of buried historical-period archaeological resources. The northern portion and the northeastern perimeter of the Project area have moderate sensitivity for the presence of buried historical-period archaeological resources. Further, any intact buried archaeological deposits related to Beaudry Park which remain extant within the Project area, they could provide important information about early park design in Los Angeles, and the work of F. Tamiet. Intact buried archaeological deposits related to the hospital which remain extant within the Project area, could provide important information about the daily lives and activities of workers and patients, the morphology of the facility, and the development of healthcare facilities in the City of Los Angeles.

Should intact, buried archaeological deposits related to the historical-period shrine remain extant within the Project area, they could provide important information related to our understanding of the expression of religion and spirituality in urban contexts, and in relation to healthcare facilities in particular. Any intact, buried archaeological deposits related to oil exploration and development in the Project area could provide important information related to the history of industrial development in the Los Angeles basin, particularly oil exploration and extraction. Intact, buried archaeological deposits related to the 1930s-1950s occupation of the apartment building in the northeast portion of the Project area could provide important information to elucidate our understanding of multi-family residences and their evolution following World War II.

Project construction plans call for excavations up to 64 feet (19.5 m) deep in some areas, which would likely destroy any cultural or archaeological resources which may be present within those depths. However, it is highly unlikely that there would be any cultural resources once bedrock is encountered. Based on the findings of the project geotechnical investigation (Geotechnologies, Inc. 2017, updated 2021), no archaeological resources are expected to be present below the point where bedrock exists, at depths ranging between 1 and 16 feet across the Project.

Therefore, the Initial Study determined that the Project could potentially cause a substantial adverse change in the significance of an archaeological resource and included Mitigation Measure CUL-MM-1 to address potential impacts to archaeological resources. Based on the analysis above, CUL-MM-1 is amended as follows:

**CUL-MM-1:** Prior to the start of Project ground disturbance, including demolition, digging, trenching, plowing, drilling, tunneling, grading, leveling, removing peat, clearing, augering, stripping topsoil or a similar activity (“Ground Disturbance Activities”) at the Project Site, a qualified principal archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior’s Standards for Archaeological Documentation, to reduce potential Project effects on unanticipated archaeological resources unearthed during construction, with an emphasis on potential historical-period materials. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. The Cultural Resource Monitoring and Treatment Plan shall also include a section describing the protocol, in the event that unanticipated human remains are discovered during Project construction.

Prior to commencing any Ground Disturbance Activities at the Project Site, the Applicant, or its successor, shall retain archeological monitor(s) who are qualified to identify archaeological resources and who shall be approved by the Department of City Planning, Office of Historic Resources (“OHR”).

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitors shall provide Worker Environmental Awareness Program (“WEAP”) training to construction crews involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing that the training was completed for all members of the construction crew involved in Ground Disturbance Activities.

The archeological monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times from the surface of native soil down until bedrock is encountered which is anticipated to be at depths ranging from 1 to 16 feet. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project Site, the principal archaeologist shall determine if additional monitors are required for other locations where such simultaneous Ground

Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the Ground Disturbing Activities encounter bedrock in the Project area, or when the archaeological monitor determines that monitoring is no longer necessary.

**With implementation of Mitigation Measure CUL-MM-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, impacts with respect to Threshold (b) would be less than significant with mitigation incorporated. No further analysis is required.**

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, no known traditional burial sites have been identified on the Project Site. In addition, the likelihood that human remains of historical or prehistoric age are preserved within the Project Site is low. Specifically, based on historical research conducted as part of the Archaeological Report (see Appendix E.2 of this Draft EIR), no references to burials on the property in association with the operation of the Sisters' Hospital (St. Vincent Hospital) were found. Further, extensive disturbances associated with the construction of the MWD complex have likely removed any historical-period deposits associated with the former hospital as well as any prehistoric deposits that may have existed within the Project Site. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5(e), Public Resources Code Section 5097.98, and California Health and Safety Code Section 7050.5. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. **Therefore, as determined in the Initial Study, in the unlikely event that any human remains are discovered during construction, compliance with regulatory requirements would reduce potential impacts to a less than significant level. As such, impacts with respect to Threshold (c) would be less than significant after compliance with regulatory requirements.**

## **e. Cumulative Impacts**

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

As indicated in Section III, Environmental Setting, of this Draft EIR, there are a total of 89 related projects in the vicinity of the Project Site. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure

III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site, including the Sunset Everett Mixed Use Project (Related Project No. 29) located at 1185 Sunset Boulevard, and the Everett Street Project (Related Project No. 32) located at 1013 Everett Street.

*(a) Historical Resources*

Related Project No. 29 involves demolition of 11 buildings constructed between 1905 and 1975 and the construction of a mixed use residential and retail development. A Historic Resources Report, prepared in January 2014 by GPA Consulting determined that none of the 11 buildings appeared individually eligible for listing in the National or California Registers, nor individually eligible as a local HCM. Furthermore, none of the buildings contribute to any potential historic district. As no historical resources were identified as part of this related project, the Draft Environmental Impact Report for Related Project No. 29 did not identify any potential historical resources impacts.<sup>18</sup>

Related Project No. 32 involves demolition of a single-family home constructed in 1905 and the development of a multi-family residential building. The house was considered by the CHC in 2016, which declined to take it under consideration. The house is therefore not eligible as a local HCM. Furthermore, due to extensive alterations, it is not likely eligible for listing in the National or California Registers. Therefore, demolition of the structure on the site of Related Project No. 32 would not result in the demolition of a historical resource.<sup>19</sup> Furthermore, as noted above, no potential historic district was identified around Everett Park.

CEQA Guidelines Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The Project has not been shown to have either a direct or an indirect impact on historical resources; nor were any historical resources identified at either of the two closest related projects. **Therefore, the Project and related projects would not result in significant cumulative impacts to historical resources. As such, the Project’s contribution would not be cumulatively considerable, and cumulative impacts to historical resources would be less than significant.**

---

<sup>18</sup> City of Los Angeles, Department of City Planning. *Sunset & Everett Mixed Use Development Project, 2016*, [https://planning.lacity.org/eir/Sunset\\_and\\_EverettMixed-UseDevProj\\_and\\_EverettSmallLotSubdiv/DEIR/index.html](https://planning.lacity.org/eir/Sunset_and_EverettMixed-UseDevProj_and_EverettSmallLotSubdiv/DEIR/index.html), accessed December 20, 2019.

<sup>19</sup> City of Los Angeles, Department of City Planning. *Case No. DIR-2016-1039-DB, ENV-2016-1040-MND*, <http://planning.lacity.org/PdisCaseInfo/Home/GetDocument/NTMzYjU3M2ltOTVhYy00YWYwLWExYTctYTnhYzFhMmRiM2Fj0>, accessed December 20, 2019.

*(b) Archaeological Resources*

With regard to potential cumulative impacts related to archaeological resources, such potential impacts are generally site specific as they relate to the particular underlying conditions of a site. Notwithstanding, as discussed above, with implementation of Mitigation Measure CUL-MM-1, the Project would not result in significant impacts to archaeological resources during ground disturbing activities. Like the Project, the related projects are located in an urbanized area that has been previously disturbed. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, including CEQA Guidelines Section 15064.5, Public Resources Code Section 21083.2, as well as any site-specific mitigation identified for that related project. **Therefore, the Project and related projects would not result in cumulative impacts to archaeological resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts to archaeological resources would be less than significant.**

*(c) Human Remains*

As with the potential for uncovering archaeological resources, the potential for discovering human remains is site specific based on the underlying conditions and historical uses of that site. Notwithstanding, like the Project, the related projects are located on sites that have been previously disturbed and the uncovering of human remains is not expected. Furthermore, like the Project, if human remains are discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5(e), Public Resources Code Section 5097.98, and California Health and Safety Code Section 7050.5. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. **Therefore, the Project and related projects would not result in cumulative impacts to human remains. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts to human remains would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts related to historical resources and human remains would be less than significant. As such, no mitigation measures related to historical resources or human remains are required. As set forth above, the Project would implement revised Mitigation Measure CUL-MM-1 related to archaeological resources.

### (3) Level of Significance After Mitigation

Cumulative impacts related to historical resources and human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included for these issues, and the impact level remains less than significant. With implementation of Mitigation Measure CUL-MM-1, the Project would not contribute to cumulative impacts associated with archaeological resources and such cumulative impacts would be less than significant.