

APPENDIX E
HISTORIC ARCHITECTURAL ASSESSMENT

HISTORIC RESOURCES TECHNICAL REPORT

Historic Resources Survey, Evaluation, and Analysis of Potential Project Impacts



MAY 2020

OCEAN AVENUE PROJECT

Santa Monica, California 90403

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1. INTRODUCTION

A. STATEMENT OF PURPOSE

This technical report documents and evaluates potential historic resources that may be affected by the implementation of the proposed Ocean Avenue Project (the Project) in Santa Monica, California. This report was prepared to facilitate environmental compliance under the provisions of the California Environmental Quality Act (CEQA) to assess the potential impacts of the proposed Project on historic resources. The survey assessment includes a discussion of survey methods utilized, the regulatory framework for historical resources, environmental setting of the study area, identification and assessment of historic resources, an analysis of potential project impacts on the identified resources, and applicable mitigation measure recommendations for any potential adverse impacts to the properties identified as historically significant. This report does not address the identification or assessment of potential project impacts to archaeological or paleontological resources.

B. PROJECT SITE LOCATION

The Ocean Avenue Project (Project) site is located in the City of Santa Monica, in the western portion of Los Angeles County, California. It is sited in downtown Santa Monica and comprises approximately 1.89 acres with approximately 350 feet of frontage along Ocean Avenue, 320 feet of frontage along Santa Monica Boulevard, and 200 feet of frontage on Second Street. More specifically, the Project site is located approximately 0.4 miles north of the Santa Monica Pier, approximately 0.5 miles northwest of City Hall, approximately 0.1 miles west of the 3rd Street Promenade and approximately 0.3 miles northwest of the open-air Santa Monica Place shopping center. (Figure 1-1, Project Vicinity).

The Project site occupies the southern half of the 1300 block of Ocean Avenue and is bounded by Ocean Avenue to the west, Santa Monica Boulevard to the south, and Second Street to the east. The north half of the block is developed with commercial properties of varying size, shape, use and function, dates of construction, and architectural style. The Ocean Avenue project site encompasses four tied parcels at the northwest corner of Santa Monica Boulevard and 2nd Street (129 Santa Monica Boulevard); four additional tied parcels at the northwest corner of Ocean Avenue and Santa Monica Boulevard (101 Santa Monica Boulevard); and three individual parcels abutting the 101 Santa Monica improvement to the north (1337, 1333, and 1327 Ocean Avenue). An alley (First Court alley) runs north-south through the

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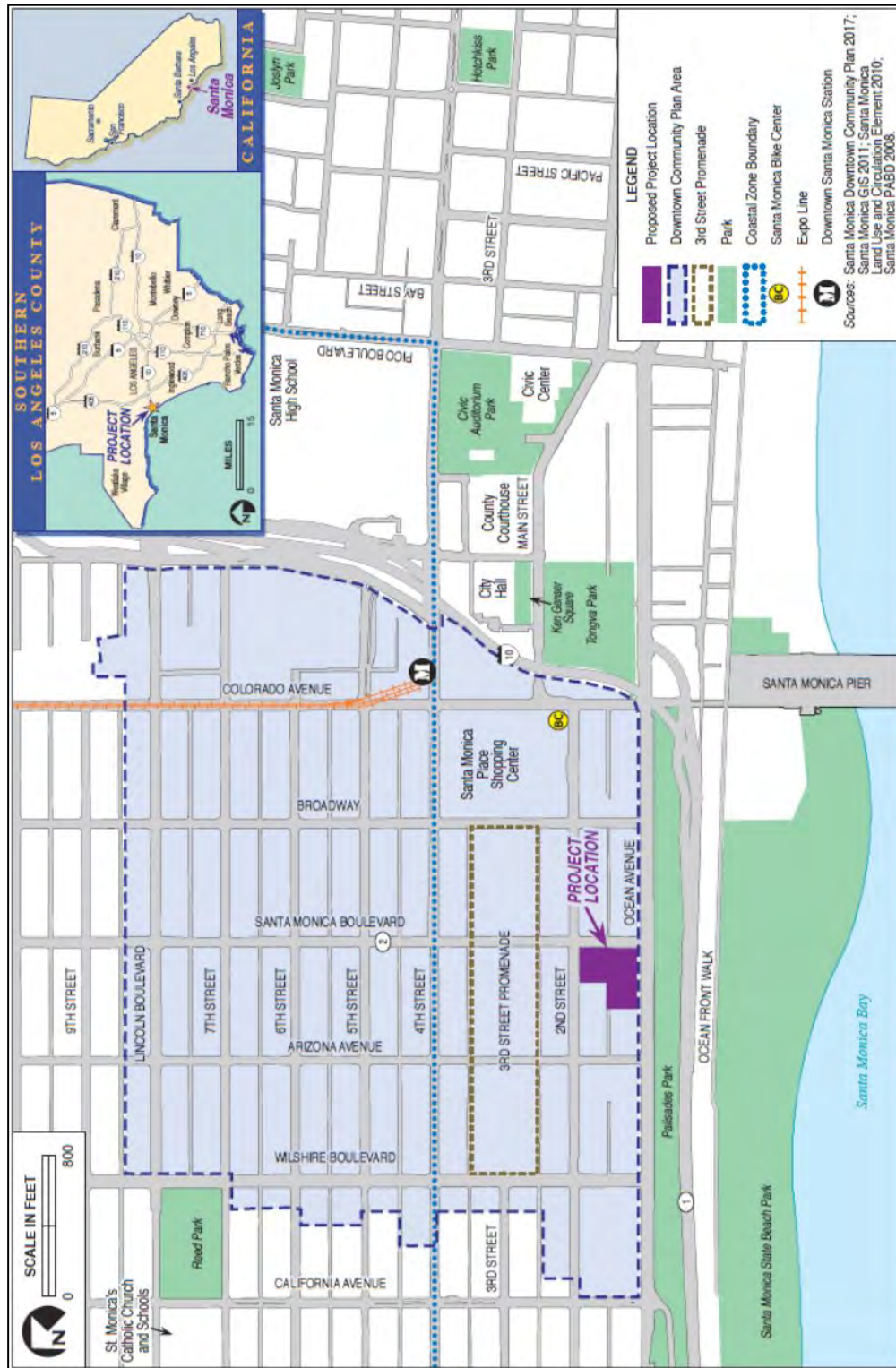


FIGURE 1-1

PROJECT VICINITY MAP

OCEAN AVENUE PROJECT
Santa Monica, California

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FIGURE 1-2

PROJECT SITE MAP
OCEAN AVENUE PROJECT
Santa Monica, California



Project site connecting Santa Monica Boulevard to Arizona Avenue. With all of the parcels included in the proposed development the project site creates an “L”-shape configuration.

C. PROJECT BACKGROUND

The Project site is located in the downtown area designated in the City’s Land Use and Circulation Element (LUCE) as the “Downtown Core.” The area is the City’s major regional retail and employment district with a human-scale and pedestrian-orientation at the street level.¹ The Downtown Core designation allows for a broad range of uses, including retail, restaurant, hotel, cultural and entertainment, office, and residential. The LUCE envisions Downtown as a thriving urban district serving the needs of residents and visitors and encourages a balance of high quality uses that will generate activity during daytime and evening hours. Moreover, the Project site is specifically identified in the LUCE as a site on which to focus new investment given its accessibility to transit and ability to accommodate mixed-use development, contribute to the pedestrian-oriented environment, and support substantial community benefits (see LUCE Policy D1.5). The LUCE does not establish maximum building height limits and target FAR or other specific standards in the Downtown Core designation; rather the LUCE defers to the standards of the DCP. The Project site is zoned Downtown District, per Chapter 9.10 of the Zoning Ordinance, and refers all development standards to the DCP.

The City Council adopted the DCP for the Downtown District in August 2017. The DCP implements the LUCE’s vision for the Downtown, including the Project site. The DCP includes detailed actions to guide new public and private development within the Downtown District, including urban form, circulation, open space, arts and culture, economic sustainability, housing, and historic preservation.

The DCP identifies three preferred community benefits for the Project site, including affordable housing, cultural institution, and historic preservation. The Project proposes to satisfy all three of the DCP’s preferred community benefits for this site, as well as additional community benefits as to be outlined in a Development Agreement with the City (see Section 2.6.10, Development Agreement). The proposed Project would include affordable and market-rate housing, a new Cultural Use Campus, and historic preservation with the rehabilitation of City-designated Landmarks on this Downtown site. Additionally, the proposed Project would implement the DCP’s vision for its uses by adding a new hotel, ground floor commercial uses (restaurant/retail), publicly accessible open space (including a rooftop public observation deck), and subterranean parking accessed by First Court Alley, while limiting its maximum height to

¹ *Santa Monica LUCE, p. 2.1-51.*

130 feet and the FAR to 2.97 (less than the maximum allowable FAR of 4.0). Therefore, the proposed Project is designed to be substantially consistent with the DCP.

C. PROJECT DESCRIPTION SUMMARY

The Ocean Avenue Project proposes the redevelopment of approximately 82,569 square feet of land (1.89 acres) within the identified Project Site with a mixed-use project designed by Gehry Partners, LLP, comprised of a hotel, apartments, cultural and historic uses, an elevated public observation deck, retail/restaurant uses, open space, and subterranean parking. Two existing City-designated landmarks are located on the Project Site and will be retained, relocated on site, and rehabilitated for adaptive use.

The proposed Project includes construction of a new hotel building consisting of 120 rooms and associated meeting, banquet, and spa space located within the Project Site along Ocean Avenue north of Santa Monica Boulevard and 100 residential apartments located on the upper floors of the buildings located at the corner of Ocean Avenue and Santa Monica Boulevard as well as new buildings developed on the project parcels at Santa Monica Boulevard and Second Street. In addition, it would include approximately 36,100 square feet of retail and restaurant uses (including outdoor dining areas) and a roughly 35,500 square feet of cultural/historic use campus (e.g. museum, gallery, event space) located at the north end of the Ocean Avenue side of the project site. The cultural campus would consist of the two existing City-designated landmarks located at 1333 and 1337 Ocean Avenue that would be rehabilitated and moved slightly on their parcels with a new building located behind (east) the two historic properties. The proposed Project also calls for a three-level subterranean parking garage providing space up to roughly 285 vehicles, long-term bicycle parking/storage, and below-grade floor area associated with the hotel, restaurant, and cultural uses. A public observation deck will be provided on the roof top of the hotel building.

In total, the proposed Project would construct five new buildings on site. The design of the new work is contemporary using set-of-the-art materials and features, which will help to differentiate the historic buildings from the new construction. A variety building heights and volumes ranging from two and twelve stories are also proposed for the new commercial buildings and hotel. Within the Project Site, a portion of the First Court alley is proposed to be rerouted into an “L”-shaped configuration resulting in vehicular access traveling south from Arizona Avenue down First Court alley then turning east to Second Street.

D. HISTORIC RESOURCES ASSESSMENT METHODOLOGY

In order to identify and assess the project site for historical significance, a multi-step methodology was utilized. A record search to identify previously documented historic resources

was conducted. This search included a review of the National Register of Historic Places (National Register) and its annual updates, determinations of eligibility for National Register listings, the California Register of Historical Resources (California Register), and the California Historical Resources Inventory System (CHRIS) maintained by the State Office of Historic Preservation (OHP). The City of Santa Monica Historic Resources Inventory (SMHRI) was also reviewed to identify any previously surveyed properties within the study area.

Site inspections of the project site were made to assess existing conditions, define the historic resources survey study area, document potential significant properties, and identify character-defining features of those properties evaluated as historically significant. A survey of the study area, including photography and the collection of archival background data, was then performed. Additional background and site-specific research was also conducted in order to evaluate potential historic resources within their proper historic context.

Criteria of the National Register, California Register, and the City of Santa Monica preservation program, as applicable, were employed to evaluate newly identified properties and/or re-confirm the significance of any previously identified properties. In addition, the survey methodology of the OHP was utilized. More specifically, in conducting the identification and evaluation of historic resources located within the study area, the following tasks were performed:

- Searched archival records of the National Register, California Register, CHRIS, and the SMHRI.
- Conducted field inspections of the study area (project site) and photographed the site and its features.
- Collected and reviewed relevant historic images and archives including, but not limited to those at the Regional History Center at the University of Southern California, the Los Angeles Public Library, the Santa Monica Public Library, the Santa Monica Historical Museum, and the University of California, Los Angeles and the University of California, Santa Barbara.
- Conducted site-specific research on historic resources including a review of relevant architectural plans, building permits, tax assessor records, Sanborn Fire Insurance Maps, historic tract maps, and other archival documents.
- Reviewed and analyzed previous documentation, ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation, designation assessment processes, and related programs.

To ensure that the methodology described herein incorporated the most current, recognized standards and was rooted in professional best practices, the following information materials maintained by the NPS and OHP were consulted and utilized:

- *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*
- *National Register Bulletin 16A: How to Complete the National Register Registration Form*
- *National Register Bulletin 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings*
- *National Register Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning*
- *National Register Bulletin 39: Researching a Historic Property*
- *OHP: Instructions for Recording Historical Resources*

The evaluation survey and impacts analysis assessment also utilized the following documents as supplemental information:

- *Historic Resource Assessment Comprehensive Update Report: 101 Santa Monica Boulevard, Santa Monica, California*, prepared by Chattel, Inc. | Historic Preservation Consultants (Chattel, Inc.), March 5, 2018.
- *101 Santa Monica Boulevard-Comparison with Like Properties Memorandum*, prepared by Chattel, Inc. | Historic Preservation Consultants (Chattel, Inc.), June 26, 2018.
- *Ocean Avenue Project, Santa Monica, California: Conformance Recommendations Memorandum*, prepared by Chattel, Inc. | Historic Preservation Consultants (Chattel, Inc.), October 8, 2019 (updated November 26, 2019; January 27, 2020).

The above documents provided additional information on the historic evaluation of the 101 Santa Monica Boulevard property for the purposes of CEQA as well as an overview of conceptual level design plans of the proposed Project specifically focusing on the two designated City Landmark buildings located within the Project site. The conformance recommendation memos further assesses the proposed Project for compliance with the

Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) and makes recommendations for future design development in order to maintain SOI Standards compliance.

The current historic resources assessment and CEQA compliance analysis of the proposed Project as well as the preparation of this technical report were completed by Jan Ostashay, Principal, Ostashay & Associates Consulting (OAC). Ms. Ostashay with over 25 years of historic preservation experience satisfies the U.S. Secretary of the Interior's Professional Qualification Standards in history and architectural history.

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2. REGULATORY FRAMEWORK

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. In addition, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities.

Numerous laws and regulations require federal, state, and local agencies to consider the effects of a proposed project on historic resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing or overseeing the action, and prescribe the relationship among other involved agencies (e.g., State Historic Preservation Office and the Advisory Council on Historic Preservation). The National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); the California Register; Public Resources Code (PRC) 5024; and the City of Santa Monica's Municipal Code are the primary laws, policies, and programs governing and affecting preservation of historic resources of national, state, and local significance.

CEQA requires that environmental protection be given significant consideration in the decision-making process of a proposed project. Historic resources are included under environmental protection. Thus, any project or action which may cause a substantial adverse change in the significance of an historic resource is a project that also has a significant effect on the environment. CEQA includes in its definition of historic resources a resource listed in, or determined eligible for listing in the California Register. Properties included on the National Register (and those formally determined to be eligible for such listing) are also automatically included on the California Register. In addition, properties designated by local municipalities can be considered historical resources under CEQA.

In order for a property to qualify for listing on the National Register, California Register, and/or as a local landmark (City of Santa Monica Landmark, Structure of Merit, or Historic District) it must satisfy the relevant criteria of significance and retain sufficient historical integrity to convey its significance. A property must retain sufficient integrity to continue to evoke the sense of place and time with which it is historically associated.

A. FEDERAL LEVEL

1. NATIONAL REGISTER OF HISTORIC PLACES

First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (National Register) was established by the NHPA, as “an authoritative guide to be used by

Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”² The National Register recognizes properties that are significant at the national, state and local levels.

B. STATE LEVEL

The OHP, implements the policies of the NHPA on a state-wide level. The OHP also carries out the duties as set forth in the Public Resources Code (PRC) and maintains the California Historic Resources Inventory (HRI) and the California Register. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the state's jurisdictions. Also implemented at the state level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

1. CALIFORNIA REGISTER OF HISTORICAL RESOURCES

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the California Register is “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”³ The criteria for eligibility for the California Register are based upon National Register criteria.⁴ Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register of Historic Places.⁵

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

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places;
- California Registered Historical Landmarks from No. 770 onward;

² *Code of Federal Regulations (CFR), 36 Section 60.2.*

³ *California Public Resources Code Section 5024.1(a).*

⁴ *California Public Resources Code Section 5024.1(b).*

⁵ *California Public Resources Code Section 5024.1(d).*

- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.⁶

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

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.⁷

2. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Under CEQA, a “project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”⁸ This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historical resource. If so, then the second part involves determining whether the project may involve a “substantial adverse change in the significance” of the historical resource.

To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted in final form on October 26, 1998 with the addition of State CEQA Guideline Section 15064.5. The State CEQA Guidelines provide that for the purposes of CEQA compliance, the term “historical resources” shall include the following three categories of historic resources:⁹

- **Mandatory**: “A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
- **Presumptive**: A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical

⁶ California Public Resources Code Section 5024.1(d).

⁷ California Public Resources Code Section 5024.1(e).

⁸ California Public Resources Code Section 21084.1 – Added in 1992 by AB 2881.

⁹ State CEQA Guidelines, 14 CCR Section 15064.5(a).

resource survey meeting the requirements in section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- **Discretionary**: Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an "historical resource" for the purposes of CEQA, as defined in Public Resources Code sections 5020.1(j) or 5024.1."

3. CALIFORNIA STATE HISTORICAL BUILDING CODE

Created in 1975, the State Historical Building Code (SHBC) provides regulations and standards for the preservation, restoration, rehabilitation, or relocation of historic buildings, structures, and properties that have been determined by an appropriate local or state governmental jurisdiction to be significant in the history, architecture, or culture of an area. Rather than being prescriptive, the SHBC constitutes a set of performance criteria. The SHBC is designed to help facilitate restoration or change of occupancy in such a way as to preserve original or restored elements and features of a resource; to encourage energy conservation and a cost-effective approach to preservation; and to provide for reasonable safety from earthquake, fire, or other hazards for occupants and users of such "buildings, structures and properties." The SHBC also serves as a guide for providing reasonable availability, access, and usability by the physically disabled.

C. LOCAL LEVEL

1. CITY OF SANTA MONICA LANDMARKS AND HISTORIC DISTRICTS ORDINANCE

The City of Santa Monica formally initiated a historic preservation program with its 1976 adoption of the Landmarks and Historic District Ordinance (Chapter 9.56 of the Santa Monica Municipal Code). Among the primary objective achieved by the Ordinance was the creation of a local designation program for buildings, structures, sites, objects, districts, and landscapes in the City that are of historical significance.

This ordinance, as amended, established the Landmarks Commission whose powers include designation of Structures of Merit and Landmarks, and recommendations to the City Council for the formal designation of Historic Districts. The Ordinance also includes criteria and procedures for designating City of Santa Monica Landmarks, Structures of Merit, and Historic Districts. Landmarks may include structures, natural features, or any type of improvement to a property that is found to have particular architectural or historical significance to the City. Furthermore, it identifies both obligations required of historic property ownership and a broad range of incentives available to owners of historic properties.

Section 9.56.140 of the ordinance empowers the Landmarks Commission, or the City Council on appeal, to issue a certificate of appropriateness (COA) for any proposed alteration, restoration, construction, removal, relocation, demolition, in whole or in part, of or to a Structure of Merit, Landmark or Landmark Parcel, or of or to a building or structure within a Historic District. A COA may be issued by the Landmarks Commission upon reviewing and approving such plans, specifications, statements of work, and any other information which is reasonably required by the Commission to make a decision on any proposed work to a designated local historic resource.

2. CERTIFIED LOCAL GOVERNMENT (CLG)

The City of Santa Monica is also a recognized Certified Local Government (CLG) as provided for in the National Historic Preservation Act of 1966, as amended, and as approved by the State Historic Preservation Officer (SHPO). As a component for being certified a CLG, the City must maintain a system for the survey and inventory of historic properties, consistent with the guidelines provided by the SHPO. Thus, the conduct of survey work is a necessary factor for participation in the CLG program under the NHPA.

3. SANTA MONICA HISTORIC RESOURCES INVENTORY

In 1980, the Planning Division staff began to inventory the City's historic resources with a study of the Central Beach Tract neighborhood. Although the objective of designating the

neighborhood as a historic district was not realized, in 1982-1983 the City authorized a city-wide survey. This became Phase I of the Historic Resources Inventory (HRI), identifying 2, 775 sites of potential significance city-wide. In 1985-1986, the City obtained a matching grant from the California Office of Historic Preservation to continue the process; Phase II of the survey documented the sections of the City north of Montana Avenue not previously inventoried. Phase III, the final increment of the Santa Monica HRI, was completed in May 1994 and encompassed the remaining 75% of the City. Following Phases I, II, and III, there were updates to the inventories completed in 1994 (following the Northridge earthquake), 1997, 2002, 2004, and 2010. The results of the 2010 survey update efforts were documented using a searchable database, which was later made available from the City's Planning & Community Development website. The most recent city-wide historic resources survey inventory update of properties was completed in 2018. As applicable, the results of the 2018 citywide historic resources inventory update assisted in the identification of resources for this historic resources technical report.

The City of Santa Monica's Historic Resources Inventory is an on-line database containing building descriptions and evaluation status of identified potential historic resources located within the city (the HRI is also available in printable table format hardcopy). Each property listed on the HRI has been evaluated by professionals using accepted industry standards and criteria. City staff uses the HRI to identify properties of potential historic significance. The information in this searchable database is provided to the public for archival purposes only. The results from the most recent historic resources survey update completed in 2018 have not yet been included in the on-line searchable HRI. Current property status of the 2018 survey update efforts are accessible on-line through the use of pdf files available at the City's Planning & Community Development website.

4. APPLICABLE GENERAL PLAN ELEMENTS

In 2002, the City adopted the Historic Preservation Element (HPE) of the General Plan. The General Plan is the City's fundamental policy document, directing the community's future growth and development. The HPE includes information about the history and historical development of Santa Monica, establishes a long-range vision for the protection of historic resources in the City, and provides implementation strategies to achieve that vision. In 2015, the City updated the General Plan Land Use and Circulation Element (LUCE), which includes a chapter on Historic Preservation (Chapter 2.3). The LUCE supplements the City's existing HPE by actively integrating the preservation of historic resources into planning efforts throughout the City. Chapter 2.3 of the LUCE includes policies to ensure that the City continues to protect what is unique and valued on a citywide and neighborhood level, including Palisades Park and the bluffs; Santa Monica Pier; and neighborhood streetscapes, architecture, and building scale.

5. DOWNTOWN COMMUNITY PLAN

The Project Site is located within the planning boundary of the Downtown Community Plan (DCP). Between 2012 and 2016, the City updated and revised its Downtown Specific Plan, a 229-acre area identified by the LUCE as bounded by Wilshire Boulevard along its northern edge, the I-10 Freeway to the south, and between Lincoln Boulevard on the east and Ocean Avenue and Palisades Park on the west.

The DCP recognizes historic preservation in the downtown area and notes that the preservation of Downtown's most important structures is an integral component of the planning process.¹⁰ In June 2016 an expedited historic resources survey of properties located within the DCP area was conducted so that the results would be available to inform the DCP update. This focused survey was a subset of the broader Citywide HRI update survey, which was concurrently being conducted for the City of Santa Monica at that time. The scope of work for the DCP survey included the evaluation of all previously identified historic resources found within the DCP's new boundaries. The survey also included the identification and evaluation of previously unrecorded resources in this area. In February 2017, the results of the Citywide HRI update survey specific to the DCP area were integrated into the DCP and later as part of the finalized 2018 Citywide HRI update survey.

Adopted by City Council on July 25, 2017, the DCP identifies preservation of historic and character-defining buildings as one of the key elements that anchor the DCP and will help maintain Downtown's identity as new infill projects take shape. The DCP provides a framework and approach that takes its cue from Santa Monica's history to support adaptive reuse, sensitive infill on underutilized parcels, and new development that embody the quality of timeless architecture and design.¹¹ Associated goals, policies, and actions for preservation within the downtown area are also outlined in the DCP.

In addition, the adopted Mitigation Monitoring and Reporting Program (MMRP) from the Downtown Community Plan Program EIR contains avoidance and minimization measures for cultural resources. Specifically for historic resources, DCP mitigation measure MM CR-1: Historic American Building Survey (HABS) Documentation states that "prior to the demolition or alteration of an identified historic resource on the HRI that cannot comply with the SOI Standards [such] historical resources shall be documented to the standards of the HABS Level 2."

¹⁰ *Santa Monica Downtown Community Plan, 2016, p. 35-38.*

¹¹ *Ibid.*

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3. ENVIRONMENTAL SETTING

A. HISTORIC CONTEXT

An historic context statement analyzes the historical development of a community, neighborhood, or property according to guidelines established by the National Park Service (NPS) and specified in the publications entitled *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* and *National Register Bulletin: How to Complete the National Register Registration Form*. It contains information about historical trends and properties, organized by important themes during a particular period of time.

An historic context is linked with tangible built resources through the concept of property type: a grouping of individual properties based on shared physical or associative characteristics. Because historic contexts are organized by theme, place, and time they link historic properties to important trends, thereby providing a framework for understanding the potential significance of a property.¹² An historic context is not a comprehensive history of an area. Rather, it is intended to highlight broad historical trends that help explain why the built environment evolved in the way that it did.

The significance of a property (or lack thereof) can be understood, judged, and explained only when it is evaluated within its historic context. Its core premise is that properties or events in history do not occur in a vacuum but rather are part of larger trends or patterns. Historic contexts are found at a variety of geographical levels or scales. A local historic context represents an aspect of the history of a town, city, county, region or any portion thereof. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made. The following setting information presents the contextual background history of the area necessary to understand and evaluate the historical significance of properties located within the survey study area.

1. SANTA MONICA

Santa Monica was originally inhabited by the Tongva people and was later incorporated into California's network of vast land grants during the state's Mexican period. In 1875, the original townsite of Santa Monica was surveyed and platted. The township grid of more than 150 blocks reached from Montana Avenue on the north, to Railroad Avenue (present-day

¹² *National Register Bulletin. How to Complete the National Register Registration Form. Washington, D.C.: National Park Service, U.S. Department of the Interior, 1997, p.4.*

Colorado Avenue) on the south, to roughly a section of 26th Street to the east, and to the Ocean Avenue to the west.¹³ Each block consisted of 24 lots bisected by an alleyway.

Between 1893 and the 1920s, the community operated as a tourist attraction, visited by mostly wealthy patrons. Those areas just outside of the incorporated city limits were semi-rural in setting and were populated with scattered residences. After the advent of the automobile in the 1920s, Santa Monica experienced a significant building boom with homes being constructed in the tracts north of Montana and east of Seventh Street for year-round residents. A number of annexations occurred in later years that further expanded the City of Santa Monica.

2. EARLY RESIDENTIAL DEVELOPMENT, DOWNTOWN AREA¹⁴

The area in what is now referred to as “Downtown” Santa Monica includes the southern portion of the original township. Only a few residential areas remain in this section of town. Nine months after the original land auction, Santa Monica had a population of approximately 1,000 people. However, following the initial influx permanent residential development was slow in the years leading up to the turn of the twentieth century. What residential building there was in Santa Monica was primarily concentrated within the blocks of Washington Avenue on the north, 7th Street on the east, Oregon Avenue (Santa Monica Boulevard) on the south, and Ocean Avenue on the west. The area south of Santa Monica Boulevard was more commercial in nature, with a cluster of small homes east of 2nd Street on Utah (Broadway) Avenue and Railroad (Colorado) Avenue. Santa Monica’s small commercial ‘downtown’ centered predominantly on 3rd Street.

Between 1893 and the 1920s, the community operated primarily as a tourist attraction/destination, visited by mostly wealthy patrons. A review of early U.S. Census records reveal that the residents of the time were primarily working class, with occupations in the nearby tourism industry, along with trades people, retailers, railroad industry workers, and retirees. Typical of the Southern California migration patterns of the period they were usually either from the Midwest or were European immigrants.

Generally, houses that occupied blocks in the southern half of the township were smaller and more modest. Larger residential structures were built by early, prominent pioneers in what is now the downtown area, along Ocean Avenue, and in the northern part of the

¹³ “A Century of History in Santa Monica, 1875-1975,” *Santa Monica Evening Outlook*, May 1975, p. 3D. These boundaries parameters represent the complete original township, which spans both the Downtown and Wilshire-Montana LUCE (Land Use & Circulation Element) neighborhoods.

¹⁴ Excerpted from the “City of Santa Monica Historic Context Statement” as part of the “Historic Resources Inventory Survey Update Report” prepared by ARG/HRG, 2018.

township. It was not uncommon for the most distinguished houses of this era to occupy large, choice corner lots and feature a carriage barn, which connoted the relative wealth and status of their owners. Construction to the eastern part of the township was generally slower to develop. Those areas just outside of the incorporated city limits were semi-rural in setting and were populated with scattered residences. Boarding houses and rooming houses, apartment hotels, and other types of more transient lodging were located in the commercial district.

The arrival of the Pacific Electric cars in 1905 sparked a period of renewed residential development within the grid of the early township. The 1918 Sanborn maps of the area confirm the prevalence of motorcars with the appearance of detached automobile garages located at the rear of numerous residential parcels. Within the township, modest single-family residences were still the dominant building type. The area's lots, most 50 feet by 150 feet in size, provided ample space for each property (lots at the north and south ends of the blocks were slightly smaller in length). Some larger residences were built on multiple parcels and prominent corners, indicating wealthy residents had established themselves in Santa Monica. These bigger houses were designed in a variety of period architectural styles including Queen Anne, Eastlake, Shingle, and the occasional Mission Revival. During this period, Nevada Avenue (present-day Wilshire Boulevard) was primarily a residential street generously landscaped and lined with Victorian era large homes, Craftsman style bungalows, and modest cottages.

After the advent of the automobile in the 1920s, Santa Monica experienced a significant building boom, with homes being constructed in the tracts north of Montana Avenue and east of Seventh Street for year-round residents. Commercial buildings, primarily one- or two-story in height, initially concentrated along 2nd and 3rd Streets between Colorado Avenue and Santa Monica Boulevard also began to expand north and eastward at this time. The impetus for this change occurred as a result of the continuing resident and tourist population growth of the City overall and their demand for consumer goods. Homes of this period were designed and built in a variety of styles including Craftsman, Colonial Revival, Mission Revival, Tudor Revival, and other period revival styles. Minimal Traditional, Streamline Moderne, and Early Modern styles began to appear during the 1930s, as well. By the time the United States entered World War II, the original township of Santa Monica was largely built out.

The downtown area where the Project site is located has changed over the years due to redevelopment. The area is now an assemblage of multi-story eclectic mixed-use, residential, and commercial properties that reflect varied architectural styles and dates of construction. However, along some of the core streets of downtown are a few extant examples of early residential and commercial architecture remaining. These rare, intact property types help reflect the City's diverse and unique architectural history.

3. CENTRAL BUSINESS DISTRICT VICINITY

The project site is located on the western edge of the City of Santa Monica's Central Business District (CBD). This commercial area is roughly bounded by Wilshire Boulevard to the north; 2nd Street to the west; Colorado Avenue/Santa Monica Freeway to the south; 4th Street (south of Santa Monica Boulevard) and 7th Street (north of Santa Monica Boulevard) to the east. Most of the improvements are commercial in function with a small scattering of residential properties and churches.

The CBD developed early in the history of Santa Monica as the location of commercial businesses catering to both local residents and the City's many visitors. Second Street, one of the oldest commercial streets in Santa Monica, and adjacent to the proposed project site, was supplanted by 3rd Street as the City's main commercial thoroughfare in the early twentieth century.¹⁵ A three-block stretch of 3rd Street was eventually closed to vehicular traffic decades later and became a pedestrian shopping area in 1965. Fourth Street between Wilshire Boulevard and Colorado Avenue evolved from a primarily residential neighborhood at the turn-of-the-twentieth-century to a predominately commercial area by the early 1920s. The impetus for this evolution from residential to commercial was the continuing growth of the residential and tourist populations as well as the subsequent demand for consumer goods.

Buildings of each period of development, from 1875 through to the present day, stand in the commercial area, their styling and historic associations providing as physical document of the commercial history of the city.¹⁶ Architecture from the 1900s and 1910s was small-scale usually one or two-stories of masonry construction and reflected a vernacular commercial style typical of the day. The most prevalent architectural styles in the area are those associated with the 1920s and 1930s, which include Spanish Colonial, Renaissance Revival, Art Deco, Streamline Moderne, and classically influenced vernacular properties. Commercial buildings located within the CBD range from one to twelve stories in height and clad in a variety of materials, including stucco, rusticated brick, terra cotta, glazed brick, and concrete. Within the Project site are two Revival style commercial buildings that were built in the 1920s. Located at 1337 Ocean Avenue is a two-story Spanish Colonial Revival style structure that was erected in 1926. This building was designated a City Landmark in 2004 for its distinctive architecture. At the northeast corner of Ocean Avenue and Santa Monica Boulevard is a two-story vernacular, altered Spanish Colonial Revival style mixed-use commercial building (101 Santa Monica Boulevard) dating from 1925.

¹⁵ "Santa Monica Historic Resources Inventory, 1985-1986: Final Report," p. 28.

¹⁶ *Ibid.*

A review of the 1950 Sanborn Fire Insurance map shows the area transformed from primarily residential to a broad mix of primarily commercial properties interspersed with the remnants of its residential past. By the 1950s, many of the initial residential structures along the streets within the CBD, including those adjacent the project site, were removed and redeveloped as large surface parking areas or multi-level hotels or commercial office buildings. Eventually, most of the older single-family residential structures that remained extant were converted to multi-family units or commercial use. The area has continued to evolve physically and architecturally. A regional retail center (mall) was added to the southern end of downtown in 1980, referred to as Santa Monica Main Place. It has since been remodeled and expanded. In recent years, the southern section of the downtown area was further changed by the completion of the Metro Expo Line in 2016, which traverses along Colorado Avenue. Commercial, institutional, and mixed-use buildings of varying heights comprise the majority of the CBD neighborhood today.

3. OCEAN AVENUE AREA

In reviewing an early Sanborn Fire Insurance map from 1895, the majority of parcels along Ocean Avenue were vacant with only a few modest single-family houses having been erected facing Palisades Park (initially called Linda Vista Park). Ocean Avenue was once a eucalyptus lined street of late 19th and early 20th century residences that faced the park and the Pacific Ocean. Miramar, the Shingle style home of one of the founders of the City, Senator John P. Jones, was a landmark of the neighborhood in the early years. Located on the northeast corner of Nevada (Wilshire Boulevard) and Ocean avenues, the site is now occupied by a hotel that perpetuates the Miramar name and is remembered by a large landmark Moreton Bay Fig tree, planted in 1899 on the Jones' estate. From the beginning the area was a residential district with a variety of period architectural styles including Queen Anne, Eastlake, Shingle, and the occasional Mission Revival.

Low-rise apartment buildings were constructed along Ocean Avenue in the early 20th century. As part of the overall commercial expansion of the city after World War II, numerous commercial office buildings were built, many of which were along Ocean Avenue, Wilshire Boulevard, and Santa Monica Boulevard. By the 1960s; however, Ocean Avenue was becoming the focal point for high-rise development in Santa Monica. One of the first developers to see opportunity in developing these commercial corridors was Lawrence Welk (1903-1992). In 1960, he developed the Union Bank Building (1961, Allison & Rible) at 2444 Wilshire Boulevard. In 1968, Welk developed the General Telephone Company Headquarters building (1971, Daniel, Mann, Johnson & Mendenhall) at 100 Wilshire Boulevard (1201 Ocean Avenue). He also developed the adjacent building, Champagne Towers; Lawrence Welk Plaza, at 1221 Ocean Avenue (1971, Daniel, Mann, Johnson & Mendenhall). Additional commercial offices were built

at 1401 Ocean Avenue (1987) and 1431 Ocean Avenue (1963). In later years, office buildings and contemporary parking structures were also built along 2nd Street near Santa Monica Boulevard and elsewhere in the downtown business district and eastward.

Many of the improvements within and adjacent to the proposed Project site are reflective of the area prior to the urbanization and development of Ocean Avenue and the nearby commercial district. There are very few physical survivors of the very early days remaining along Ocean Avenue. One of the existing buildings located within the Project site, 1333 Ocean Avenue (1906), is good example of early Queen Anne residential architecture dating from the first decade of the 20th century. Another such example is the Gussie Moran House located at 1323 Ocean Avenue (c.1887-1891), which dates to the late 19th century. Both of these particular properties are designated City Landmarks. Ocean Avenue and surrounding area are currently developed with a broad mix of residential, commercial, hotel, and restaurant uses, as well as other mixed-use improvements of varying size, style, and date of construction.

4. IDENTIFICATION AND EVALUATION OF HISTORIC RESOURCES

A. EXISTING CONDITIONS

1. PROJECT VICINITY SETTING

The Project site is located at the western edge of the City's downtown area, an urban area with a broad mix of hotel, restaurant and retail, and entertainment uses, as well as office and multi-family residential uses. The downtown neighborhood includes the southern portion of Santa Monica's original township, which was subdivided in 1875 and initially contained 150 blocks.¹⁷ As the area grew, residential development clustered within the blocks north of Wilshire Boulevard, which now lay outside of the Downtown neighborhood boundaries. The area south of Santa Monica Boulevard assumed a commercial character, while a small "downtown" developed along Third Street. Today, the City's downtown is predominately commercial in nature, and its boundaries exclude areas of the original township where substantial residential development occurred. Only a few residential properties remain, and of those, many have been rezoned for commercial uses. Commercial, institutional, and mixed-use buildings of varying height, style, and type comprise the majority of the area.¹⁸

Within the neighboring vicinity of the Project Site are a diversity of land uses and improvements. North of the site along Ocean Avenue include the 1891 Gertrude "Gussie" Moran House, a two-story, Queen Anne style City-designated Landmark building (1323 Ocean Avenue) currently in commercial use and the adjacent eight-story, Streamline Moderne style City-designated Landmark the Hotel Shangri La (1301 Ocean Avenue). South of the Project Site along Ocean Avenue is a three-story, mixed-use contemporary style building with office and restaurant uses (1401 Ocean Avenue; 1987); the eight-story Streamline Moderne style Georgian Hotel building (1415 Ocean Avenue; 1931), which is a City-designated landmark; and a fifteen-story, mixed-use contemporary building (1431 Ocean Avenue; 1963) with ground floor retail and apartments on the upper floors.

Palisades Park (City-designated Landmark) is located west of the Project site across Ocean Avenue. The park occupies the top of the bluff west of Ocean Avenue and is across the street from the project site. The park looks out over Palisades Beach Road (Pacific Coast Highway) and the beach below. The City of Santa Monica acquired the land that would become

¹⁷ *Architectural Resources Group and Historic Resources Group, City of Santa Monica Citywide Historic Resources Inventory Update, Survey Report, prepared for the City of Santa Monica, August 2018, p.16.*

¹⁸ *Ibid.*

Palisades Park from the City founders and Nevada Senator John P. Jones and the widow Mrs. Arcadia Bandini de Stearns Baker, and the Santa Monica Land and Water Company in the latter years of the nineteenth century. Once characterized by numerous Eucalyptus trees that were replaced over the years, Palisades Park today is landscaped with several types of palm trees, grassy lawns, and meandering concrete pathways.

State Highway 1 (Pacific Coast Highway) and Santa Monica State Beach are located at the base of the Palisades bluffs to the west of the Project site and Palisades Park. East of the Project Site along 2nd Street (to the north), the area includes an altered contemporary style two-story commercial building with ground floor restaurant uses, movie theater, and roof top restaurant (1332 2nd Street; 1969) and a three-story office building (1328 2nd Street; 1994). Along the east side of 2nd Street there is a seven-story commercial building (201 Santa Monica Boulevard; 1983); a six-story commercial building (1333 2nd Street; 1991); and a nine-level City owned contemporary type public parking structure. At the southwest corner of 2nd Street and Santa Monica Boulevard is an altered single-story commercial building (1402 2nd Street; 1925) and an altered two-story commercial building across the street at 202 Santa Monica Boulevard (1930).

2. Project Site Setting

The Project Site is located in a highly urban area and is near the state beach and Pacific Ocean to the west (across Ocean Avenue and below the bluff at Palisades Park). It is bordered by Ocean Avenue (west), Santa Monica Boulevard (south), Second Street (east), and three adjacent parcels along Ocean Avenue to the north. A north/south oriented alley currently runs through the center of the Project site.

Within the Project site are four commercial buildings and two surface parking lots. A two-story mixed-use commercial, residential building with a rooftop penthouse (101 Santa Monica Boulevard) is sited at the northeast corner of Ocean Avenue and Santa Monica Boulevard. Adjacent this improvement to the north is a paved parking that occupies two tied parcels. Access to the parking lot is via Ocean Avenue and the rear alley (First Court alley). The abutting lot to the north (1337 Ocean Avenue) is developed with two improvements, a two-story Spanish Colonial Revival style commercial building, which is a City- designated Landmark, and a two-story detached vernacular type structure at the rear of the parcel. Proceeding northward, the parcel at 1333 Ocean Avenue is also developed with two improvements, a Queen Anne style City-designated Landmark (Victorian House) that is sited at the front of the lot and a two-story detached vernacular style structure at the rear. The northernmost parcel that is within the Project Site along Ocean Avenue is improved with a two-story Modern style mixed-use commercial, residential building (1327 Ocean Avenue). The eastern portion of the

Project Site occupies the northwest corner of Santa Monica Boulevard and 2nd Street and is comprised of four tied parcels (129 Santa Monica Boulevard) currently used as a parking lot.

B. CRITERIA FOR EVALUATION OF HISTORIC RESOURCES

1. NATIONAL REGISTER OF HISTORIC PLACES CRITERIA

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. For National Register consideration four criteria have been established to determine the historical significance of a resource:¹⁹ A property of potential significance must meet one or more of the following four established criteria:

- Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: It is associated with the lives of persons significant in our past;
- Criterion C: It embodies 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;
- Criterion D: It yields, or may be likely to yield, information important in prehistory or history.

A property eligible for the National Register must meet one or more of the above criteria as well as retain sufficient integrity to visually and physically convey its historical significance. In addition, unless the property possesses exceptional significance, it must be at least fifty (50) years old to be eligible for National Register listing.

¹⁹ *Guidelines for Completing National Register Forms, National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986 ("National Register Bulletin 16"). This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the National Register of Historic Places.*

Integrity

In addition to meeting the criteria of significance, a property must have integrity. “Integrity is the ability of a property to convey its significance.”²⁰ According to *National Register Bulletin 15*, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.²¹ The seven factors that define integrity are location, design, setting, materials, workmanship, feeling and association. The following is excerpted from *National Register Bulletin 15*, which provides guidance on the interpretation and application of these factors:

- Location is the place where the historic property was constructed or the place where the historic event occurred.²²
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.²³
- Setting is the physical environment of a historic property.²⁴
- 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.²⁵
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.²⁶

²⁰ *National Register Bulletin 15*, p. 44.

²¹ *Ibid.*

²² “The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved.” *Ibid.*

²³ “A property’s design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.” *Ibid.*

²⁴ *Ibid.*, p.45.

²⁵ “The choice and combination of materials reveals the preferences of those who created the property and indicated the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area’s sense of time and place.” *Ibid.*

- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.²⁷
- Association is the direct link between an important historic event or person and a historic property.²⁸

In assessing a property's integrity, the National Register criteria recognize that properties change over time, therefore, it is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.²⁹ For properties which are considered significant under National Register Criteria A and B, *National Register Bulletin 15* states that a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).³⁰ In assessing the integrity of properties which are considered significant under National Register Criterion C, *National Register Bulletin 15* provides that a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.³¹

2. CALIFORNIA REGISTER OF HISTORICAL RESOURCES CRITERIA

To be eligible for the California Register, a property generally must be at least fifty (50) years of age and must be significant at the local, state, or national level under one or more of the following four criteria:

²⁶ "Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques." *Ibid.*

²⁷ "It results from the presence of physical features that, taken together, convey the property's historic character." *Ibid.*

²⁸ "A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. . . . Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register." *Ibid.*

²⁹ *Ibid.*, 15, p. 46.

³⁰ *Ibid.*

³¹ "A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style." *Ibid.*

- Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Criterion 2: Is associated with the lives of persons important in our past;
- Criterion 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; and/or
- Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be considered and evaluated for California Register listing.³²

Integrity

Integrity, as considered for the California Register, is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.³³

3. CALIFORNIA OFFICE OF HISTORIC PRESERVATION SURVEY METHODOLOGY

The evaluation instructions and classification system prescribed by the OHP in its *Instructions for Recording Historical Resources* provide a three digit evaluation code for use in classifying potential historic resources. The first digit indicates one of the following general evaluation categories.

1. Listed in the National Register or the California Register;
2. Determined eligible for listing in the National Register or the California Register;

³² *California Code of Regulations, California Register of Historical Resources (Title 14, Chapter 11.5), Section 4852(c).*

³³ *Ibid.*

3. Appears eligible for the National Register or the California Register through survey evaluation;
4. Appears eligible for the National Register or the California Register through other evaluation;
5. Recognized as Historically Significant by Local Government;
6. Not eligible for any Listing or Designation; and
7. Not evaluated for the National Register or California Register or needs re-evaluation.

The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is used to further specify significance and refine the relationship of the property to the National Register and California Register. Under this system categories 1 through 4 pertain to various levels of National Register or California Register eligibility. Category 5 pertains to properties that are ineligible for National Register or California Register listing, but are recognized as historically significant by local government. In addition, properties not eligible for listing or designation in the National Register, California Register, or at the local level, but perhaps are of local interest in the planning process are given an evaluation status code of 6.

4. CITY OF SANTA MONICA SIGNIFICANCE CRITERIA

Section 9.56.100 of the City of Santa Monica Landmark and Historic Preservation Ordinance authorizes the Landmarks Commission to designate properties as Landmarks. Such designation may be made provided that a property meets one or more of the following six statutory criteria:

- Criterion 1: It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.
- Criterion 2: It has aesthetic or artistic interest or value, or other noteworthy interest or value.
- Criterion 3: It is identified with historic personages or with important events in local, state or national history.
- Criterion 4: It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or

craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.

Criterion 5: It is a significant or a representative example of the work or product of a notable builder, designer or architect.

Criterion 6: It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

The individual designation of properties as City of Santa Monica Landmarks is held to the highest level of historical or architectural significance locally. Structures of Merit; however, are recognized historic resources that are determined to have a limited degree of individual significance. The City's Landmarks Commission may approved a Structure of Merit designation if it determines that it merits official recognition because it satisfies one or more of the following characteristics, outlined in SMMC 9.56.080 of the Ordinance:

Criterion A: The structure has been identified in the City's Historic Resources Inventory.

Criterion B: The structure is a minimum of 50 years of age and meets one of the following criteria:

1. [It] is a unique or rare example of an architectural design, detail or historical type.
2. [It] is representative of a style in the City that is no longer prevalent.
3. [It] contributes to a potential Historic District.

The Ordinance defines a Historic District as "any a geographic area or noncontiguous grouping of thematic grouping of related properties that the City Council has designated as and determined to be appropriate for historical preservation."³⁴ A Historic District may be designated if it satisfies one or more of the following four statutory criteria, as outlined in the SMMC 9.56.100(b):

Criterion 1: Any of the criteria identified in Section 9.56.100(a)(1) through (6).

Criterion 2: It is a noncontiguous grouping of thematically related properties or a definable area possessing a concentration of historic, scenic or thematic

³⁴ *Santa Monica Municipal Code, 9.56.030 (Definitions).*

sites, which contribute to each other and are unified aesthetically by plan, physical development or architectural quality.

Criterion 3: It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.

Criterion 4: It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community, or the City.

Integrity

Currently, the City of Santa Monica designation criteria does not include a definition of historic integrity in its ordinance. However, the City of Santa Monica is a Certified Local Government (CLG) as defined under the National Historic Preservation Act, as amended, and is, therefore, certified to participate in the identification, registration, and preservation of historic properties located within its jurisdiction of local government. Pursuant to the CLG program, the City has developed and implements a local historic preservation program based on federal and state standards. As required under the program, Santa Monica is obligated to maintain a system for the survey and inventory of historic properties. It is, therefore responsible to assure that survey activities are coordinated with and complementary to the state program and are conducted in conformance with state survey standards and procedures. In addition, survey standards utilized for evaluation of properties must be consistent with the National Register of Historic Places criteria methodology, the Secretary of the Interior's Standards for Identification and Evaluation, and the State Office of Historic Preservation survey methodology.

As obligated under the CLG program, the City must also consider the historical integrity of properties being surveyed and assessed for potential local landmark (and historic district) eligibility. Historic integrity is the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's...historic period." A property eligible for local designation must satisfy the applicable City significance criteria and retain enough of its historic character and original appearance to be recognizable as a historical resource.

C. IDENTIFICATION OF HISTORIC RESOURCES

1. PREVIOUS SURVEYS AND EVALUATIONS

OAC consulted the National Register, California Register, OHP HRI, relevant prior OHP Information Center records search findings, the City's HRI and online HRI database, prior environmental impact reports and associated technical reports, among other primary and

secondary sources to determine previously identified historic resources within the Project vicinity and survey study area.

Historical resources investigations included records searches and review of local HRI data to determine 1) if historical resources have previously been identified and recorded within the defined survey study area and within the nearby Project vicinity; 2) if the properties within the survey study area have been systematically surveyed by historians prior to the initiation of the current study; and 3) whether there is other information that would indicate whether or not the area of the Project Site or those properties adjacent the Project Site are historically sensitive or may be susceptible to potential indirect impacts associated with the proposed Project.

The previously recorded properties located within the Project vicinity (0.25-mile radius) are listed in the following table. As itemized in the table, there are forty-one (41) previously identified historical resources within a 0.25-mile radius of the Project Site. Of these forty-one (41) properties, eight (8) properties were identified as appearing individually eligible for the National Register and California Register (status code 3S, 3CS); another property appeared eligible individually for the California Register (status code 3CS); twenty (20) properties were identified as being designated as Landmarks by the City of Santa Monica (status code 5S1); and fourteen (14) properties were identified as individually eligible for local listing or designation through survey evaluation (status code 5S3). In addition, seven (7) properties were previously identified as being individually eligible for local listing or designation as a City of Santa Monica Structure of Merit through survey evaluation, indicated with the status code 5S3*.

Between 2012 and 2016 the City updated and revised its Downtown Specific Plan, now referred to as the Downtown Community Plan (DCP). A historic resources survey of the DCP area was conducted in 2017 as part of the Citywide HRI update, which identified a total of 78 eligible resources in the DCP area (30 are locally designated; and 48 are individually eligible) and concluded that the previously identified Central Business District Historic District no longer retains sufficient historical integrity to be eligible as a City historic district.³⁵

³⁵ *Architectural Resources Group and Historic Resources Group, City of Santa Monica Citywide Historic Resources Inventory Update, Downtown Community Plan Area, prepared for the City of Santa Monica, July 2017.*

**PREVIOUSLY RECORDED HISTORICAL RESOURCES WITHIN PROJECT VICINITY
(0.25-mile radius)**

Address/Location	Description	Built Date	Status Code
1305 2 nd Street	Mar Vista Apts.	c.1914	5S1; 3S; 3CS
1308 2 nd Street	The Christian Institute	1949	5S3
1415-17 2 nd Street	HRI 1205	1934	5S3
1438 2 nd Street	Rapp Saloon	1875	5S1; 3S; 3CS
1202-08 3 rd Street (Promenade)	Former J.C. Penney Building	1949	5S1; 3S; 3CS
1225-27 3 rd Street (Promenade)	HRI 414	1938	5S3*
1254 3 rd Street (Promenade)	HRI 1185	1937	5S3
1301-13 3 rd Street (Promenade)	Criterion Theatre and Apartments	1924	5S3; 3S; 3CS
1324 3 rd Street (Promenade)	F.W. Woolworth Building	1949	5S3*
1338 3 rd Street (Promenade)	W.T. Grant Building	1937	5S3
1354 3 rd Street (Promenade)	HRI 240	1930	5S3*
1330-34 4 th Street	HRI 532	1931	5S3
1424 4 th Street	Central Tower Building	1929	5S1; 3S; 3CS
1433-37 4 th Street	Tegner Building	1927	5S3
1443 4 th Street	HRI 1003	1929	5S3
1455 4 th Street	Lido Hotel	1931	5S1
127 Broadway	Whitworth Block	1920	5S3
201 Broadway	Carmel Hotel	1928	5S3
227 Broadway	Keller Block Building	1892	5S1; 3CS
100-1500 Ocean Ave (west side)	Palisades Park	1892	5S1
1133 Ocean Avenue	Miramar Morten Bay Fig Tree	Pre-1900	5S1
1221 Ocean Avenue	Lawrence Welk Plaza/Champagne Towers	1971	5S3
1301 Ocean Avenue	Shangri-La Hotel	1939	5S1; 3S; 3CS
1323 Ocean Avenue	Gussie Moran House	c.1891	5S1; 3S; 3CS
1333 Ocean Avenue	Victorian House	1906	5S1
1337 Ocean Avenue	Spanish Colonial Revival Commercial	1926	5S1
1415 Ocean Avenue	Georgian Hotel	1931	5S1
1431 Ocean Avenue	Pacific Plaza	1963	5S3
1301 Palisades Beach Road	HRI 1077	1930	5S3*

1309-13 Palisades Beach Road	HRI 1151	1928	5S3*
1401 Palisades Beach Road	Elkhorn Apts./Sandy Bay House	1909	5S1
1419 Palisades Beach Road	HRI 324	1909	5S3
101-117 Santa Monica Boulevard	HRI 1199	1925	5S3*
208-10 Santa Monica Boulevard	Mayfair Theatre-Majestic Theatre	1911/1929	5S1
212-16 Santa Monica Boulevard	Mayfair Theatre Terrazzo	1929	5S1
221-255 Santa Monica Boulevard	Bay Cities Guaranty Building	1929	5S1; 3S; 3CS
301 Santa Monica Boulevard	Juniper Building	1912	5S1
401 Santa Monica Boulevard	Security Building	1925	5S3*
402 Santa Monica Boulevard	Henshey's-Tegner Building and Annex	1925/1936	5S1
100 Wilshire Boulevard	Lawrence Welk Plaza/ General Telephone Building	1971	5S3
101 Wilshire Boulevard	Palisades Building/Miramar Hotel	1924	5S1
<p><u>KEY-CALIFORNIA HISTORICAL RESOURCE STATUS CODES:</u></p> <p>3S: Appears eligible for National Register as an individual property through survey evaluation.</p> <p>3CS: Appears eligible for California Register as an individual property through survey evaluation.</p> <p>5S1 : Individual property that is listed or designated locally (City of Santa Monica).</p> <p>5S3: Appears to be individually eligible for local listing or designation through survey evaluation.</p> <p>5S3*: Appears to be individually eligible for local listing or designation through survey evaluation (City of Santa Monica Structure of Merit)..</p>			

Of the forty-one (41) previously recorded historic resources listed above, five (5) properties were identified as being located within the Project site or immediately adjacent to the site. Those five properties include four (4) built improvements and a public park, which are listed as follows:

Properties within Project Site

- 1333 Ocean Avenue, Victorian House (commercial)
- 1337 Ocean Avenue, Spanish Colonial Revival Commercial Building
- 101 Santa Monica Boulevard, Mixed-Use Building (commercial/residential)

Properties Adjacent to Project Site

- 1323 Ocean Avenue, Gussie Moran House (commercial)
- 100-1500 blocks of Ocean Avenue (west side), Palisades Park

2. SURVEY AND EVALUATION METHODOLOGY

Survey Study Area Defined

The historic resources survey study area (study area) is influenced by the size, scale and nature of a project, in addition to any potential direct and indirect impacts the Project may have on identified historic resources. The current survey study area was identified based on the anticipated direct and indirect effects of the proposed Project on identified potential historic resources. The survey study area was, therefore, considered to include all parcels (improvements) within the Project site as well as those parcel lots immediately adjacent to or facing the project site (extending one parcel beyond the project site). To ensure all built environment historic resources that may be potentially affected by the proposed Project are considered those parcels within the study area that contain buildings, structures, or objects that were at least 45 years of age (or appeared to possess exceptional significance), have substantial integrity, and exhibited distinguishing characteristics or important associations known to be potentially significant were subject to intensive-level study. Upon defining the survey study area thirteen (13) properties were identified as being located within the Project site or immediately adjacent to the site.

PROPERTIES WITHIN SURVEY STUDY AREA

Description		Address/Location	Built Date
Properties within Project Site			
1	Mixed-Use Commercial Building	1327 Ocean Avenue	1951
2	Commercial Building	1333 Ocean Avenue	1906/1941
3	Commercial Building	1337 Ocean Avenue	1926/1951
4	Mixed-Use Commercial Building	101 Santa Monica Boulevard	1925
Properties Adjacent to Project Site			
5	Commercial Building	1401 Ocean Avenue	1987
6	Commercial Building	1402 2 nd Street	1925
7	Commercial Building	202 Santa Monica Boulevard	1930
8	Commercial Building	201 Santa Monica Boulevard	1983
9	Commercial Building	1333 2 nd Street	1991
10	Commercial Building	1332 2 nd Street	1969
11	Commercial Building	1328 2 nd Street	1994
12	Commercial Building	1323 Ocean Avenue	c.1887-1891
13	Public Park (Palisades Park)	100-1500 blocks Ocean Ave (west side)	1892

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KEY:

1. 1327 Ocean Avenue, Mixed-Use Commercial Building
2. 1333 Ocean Avenue, Commercial Building
3. 1337 Ocean Avenue, Commercial Building
4. 101 Santa Monica Boulevard, Mixed-Use Commercial Building
5. 1401 Ocean Avenue, Commercial Building
6. 1402 2nd Street, Commercial Building
7. 202 Santa Monica Boulevard, Commercial Building
8. 201 Santa Monica Boulevard, Commercial Building
9. 1333 2nd Street, Commercial Building
10. 1332 2nd Street, Commercial Building
11. 1328 2nd Street, Commercial Building
12. 1323 Ocean Avenue, Commercial Building
13. 100-1500 blocks Ocean Avenue (west side), Public Park



FIGURE 4-1

SURVEY STUDY AREA

OCEAN AVENUE PROJECT

Santa Monica, California

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The survey study area includes improvements in the downtown Santa Monica area of varying dates of construction, property type/use, and architectural style. There are multiple assessor parcel numbers associated with the study area. In some instances there is more than one building on a parcel and the two parking lots cover more than one parcel.

Evaluation Process

The current survey identification and evaluation process was conducted of the survey study area pursuant to OHP methodology, which gives a 45-year threshold for assessing properties for historical significance. During the current survey efforts nine (9) pre-1974 properties were identified within the study area. The nine properties further assessed herein this report included eight built improvements and a public park.

Those properties that appeared to be under the 45-year threshold (post-1975 construction) were not documented in the current survey unless they exhibited “exceptional” importance.³⁶ Upon concluding the survey assessment, none of the identified post-1975 properties warranted further consideration as they did not exhibit exceptional significance as necessary for National Register, California Register, or any type of local City of Santa Monica designation eligibility. In addition, vacant parcels and/or parking lots located within the survey study area were not recorded or assessed for historical significance.

D. EVALUATION OF HISTORIC RESOURCES WITHIN SURVEY STUDY AREA

1. Evaluation of Historic Resources within Project Site

In assessing the historic significance of properties located within the survey study area, various criteria for designation under federal, state, and local landmark programs were considered and applied. The California Office of Historic Preservation survey methodology and instructions were also used to evaluate the relative significance of properties. In total, four properties were assessed for historical significance within the Project site itself. Those properties under review within the Project Site boundary include the following:

Mixed-Use Property, 1327 Ocean Avenue (APN: 4291-014-018)

The multi-family building with commercial space located at 1327 Ocean Avenue has not been formally assessed for historical significance under any of the city’s prior survey efforts. In March 2004; however, a demolition permit application was filed for the property. At the Landmarks Commission hearing on April 12, 2004, the Commission reviewed the demolition

³⁶ As defined in *National Register Bulletin 15*, p.42.

permit application material for the property to determine whether to file an application for designation of structure as a Landmark or Structure of Merit. At that time, the Commission did not motion to file an application to designate 1327 Ocean Avenue as either a City Landmark or Structure of Merit. As part of a previous EIR prepared for a prior proposed hotel project on the site a historic resources assessment technical report was prepared in September 2006. At that time, the 1327 Ocean Avenue property was evaluated for historical significance and its eligibility for listing on the California Register. The assessment concluded that the property was ineligible for listing in the California Register due to lack of any historical and architectural merit and was, therefore, not considered an historical resource for the purposes of CEQA.³⁷ As the property is not a formally designated City of Santa Monica landmark it will be re-assessed herein at an intensive level for the purposes of CEQA as part of this environmental review.

Property Description

The legal description of the property is “Lot S, Block 148 of the Town of Santa Monica Tract.” The two-story building was completed in 1951 with some minor influences of the Minimal Traditional style evident. The property features a modified “L” shape plan for the two-story apartment complex and a rectangular plan for the adjacent small two-story office/apartment structure. A paved walkway set between the two improvements leads from the street to the back of the parcel and provides pedestrian access to the individual units, staircases, and integrated garages along the alley. The long apartment complex is capped by a complex hip roof with extended boxed eaves. The narrow office space, which is offset to the south side of the lot, is crowned by a flat roof with minimal overhang. Both structures are sheathed in stucco and are punctuated by fenestration of varying type and size that include tripartite fixed-frame with flanking sash, double-hung sash, and fixed-frame. Door assemblies include wood panel, wood flush, wood-framed glazed, multi-pane French, and sliding glass doors. The upper exterior walkway deck is sheltered by the extended eaves of the apartment building and is semi-enclosed by non-descript wrought iron railings with wrought iron posts. A small flat roof penthouse with open deck sits rooftop at the western end of the apartment building while the upper floor of the office suite also features a semi-covered open balcony deck with wrought iron railing. The buildings are united together by the second floor walkway deck near the front (west) of the parcel.

³⁷ Jones & Stokes Associates, Inc., *Cultural Resources Survey and Impacts Analysis Technical Report, September 2006*; EIP Associates, *City of Santa Monica Ocean Avenue Hotel Final Environmental Impact Report, April 2007*. The prior hotel project was ultimately approved by the City Council in April 2007, but was never built. The entitlements for the hotel project expired in June 2012.

Property History

Permits were issued to then property owner James Lewis Rogers (1903-199) of Santa Monica in October of 1950 for the construction of an eleven unit apartment building with office suite. According to the original permit, the structure had a construction value of \$66,000 and was designed by local architect Lawrence B. Clapp (1879-1956). Clapp's office was conveniently nearby at 1320 2nd Street. There is very limited information on the professional career of Clapp, though he is recognized as the designer of the Spanish Colonial Revival style Gayley Terrace apartment building in Los Angeles built in 1940.³⁸ The initial commercial use of the office suite was as an insurance agency. Early occupants of the apartment units included white and blue collar workers, widows, and retirees. By the late 1950s, the property was listed in the local city directory as the "Rebecca Panoramic Apartments;" named after Rogers' mother Rebecca McDonald Rogers. In conducting research on the property, little information was found on James L. Rogers; however, he was a member of the City of Santa Monica Redevelopment Agency in 1962. No sufficient evidence was uncovered during this current assessment to indicate Clapp as a master architect or Rogers as an important historical individual.

Significance Assessment

The eligibility of the property as a potential historical resource was assessed by evaluating it against the criteria of the National Register, California Register, and City of Santa Monica Landmark criteria. The property does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the property located at 1327 Ocean Avenue does not appear to be eligible for listing in the National Register, California Register, or as a City of Santa Monica Landmark. For the purposes of CEQA compliance it is not considered an historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

Commercial Property, 1333 Ocean Avenue (APN: 4291-014-017)

The "Victorian House" located at 1333 Ocean Avenue was designated a City of Santa Monica Landmark on June 11, 2001. The legal description of the parcel is "Lot R, Block 148 of the Town of Santa Monica Tract." According to county assessor records the Queen Anne style building dates to 1906, as no original permits are on file with the City. The building was originally designed as a single-family residence, but decades later it was converted to commercial use. A detached two-story office building was added at the rear (east) of the lot in

³⁸ *Designated a City of Los Angeles Historic-Cultural Monument (#363) in 1988 for being a high-style example of Spanish Colonial Revival architecture in the Westwood community.*

1941. This ancillary structure was not part of the formal landmark designation. According to the landmark designation Statement of Action (STOA) the Queen Anne style structure satisfied Landmark Criteria 1, 2, and 3, as follows:

The structure exemplifies...elements of the...architectural history of the City in that it was constructed circa 1906, and retains sufficient architectural integrity and historical context to reflect the early residential development of the City. The subject property is one of sole surviving property types (residential) along Ocean Avenue that illustrates the early history of Santa Monica. In addition, the structure embodies distinguishing architectural characteristics valuable to a study or a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a rare example of an architectural design, detail, or historical type to such a study. This Queen Anne style residence (now utilized as commercial) incorporates many of the trademarks of its type, including clapboard cladding, roof treatments with boxed eaves and exposed rafter tails, dentils, and a steeply pitched roof. The two-story shingled tower is another classic feature associated with this idiom. The structure also has a unique location and is an established and familiar visual feature of the City in that it is a rare example of a turn-of-the-century residential property lining the original development along Ocean Avenue. The small remaining cluster of structures, including this property and the Gussie Moran House, mark some of the few surviving properties that illustrate what Ocean Avenue was like when it was once a eucalyptus lined street developed with late 19th and early 20th century residences.

Associated character-defining features for the City-designated Landmark property are based on the information in the city landmark evaluation report (February 1, 2001) prepared for the property and the STOA detailing the findings and determinations of the Landmarks Commission. Such extant features include the following:

- Location and orientation of building on Ocean Avenue with front façade facing west
- Asymmetrical composition of front (west) façade and side elevations
- Steeply pitched multi-gable roof with boxed eaves, exposed rafter tails, dentils, and wide trim band at cornice lines
- Large side dormers
- Triangular section with pent roof in top of front (west) gable
- Horizontal wood clapboard siding and wood shingle siding

- Fenestration: recessed wood-frame sash, fixed, and fixed-pane with transom (wood material, type, size and shape, placement, casings, sills and wide mold trim surrounds)
- Large bay window at front (west) façade with mold trim surrounds
- Recessed centrally located main entry with monumental wide door, transom and mold trim surrounds
- Open front porch (now enclosed) with wood spindle balustrade and ornate column posts
- Integral second floor open porch on front (west) facade with wood spindle balustrade
- Multi-story round tower with wood shingle siding
- Red brick cheek walls with concrete caps and entry stairs centered on front (west) façade
- Brick chimney

The period of the significance for the Queen Anne landmark building is 1906, the date it was constructed and retained all of its original architectural, stylistic features. For the purposes of CEQA compliance this property is considered an historical resource, as defined under the CEQA Guidelines.³⁹

Commercial Property, 1337 Ocean Avenue (APN: 4291-014-016)

The Spanish Colonial Revival style commercial building located at 1337 Ocean Avenue was designated a City of Santa Monica Landmark on August 9, 2004. The legal description of the property is “Lot Q, Block 148 of the Town of Santa Monica Tract.” According to county assessor records the building dates to 1926, as no original permits are on file with the City. A detached garage with later (1951) addition (now used as office space) is situated at the southeast corner of the lot. This ancillary structure was not part of the formal landmark designation. According to the landmark designation Statement of Action (STOA) the two-story structure satisfied Landmark Criteria 1, 4, and 6, as follows:

³⁹ *California Environmental Quality Act, Section 15064.5(a).*

The subject property manifests elements of the City's architectural history in that the two-story Spanish Colonial Revival structure was built in 1926, and retains the essential physical features that constitute this style including stuccoed walls, red clay tile roof highlights, wrought iron balconettes, and arched shaped window and door openings. In the 1920s and 30s, the period during which this property was built, this area of the City experienced a development boom as the City transitioned to a year-round resort community. The Spanish Colonial style of the structure was especially popular during this era of the City's development and was key to the architectural history and character of the City....The subject building is now one of the few remaining historic structures along Ocean Avenue of the Spanish Colonial style. It was originally designed as a mixed-use building that included four apartment units and a ground floor commercial space; it extended the downtown commercial area northward at a time when Ocean Avenue was largely development with residential uses in that direction...the property reflects and manifests the evolutionary urban development of the City's architectural history, particularly along Ocean Avenue and maintains sufficient integrity to continue to reflect this development.

Associated character-defining features for the designated landmark property are based on the information in the city landmark evaluation report (May 4, 2004) prepared for the property and the STOA detailing the findings and determinations of the Landmarks Commission. Such extant features include the following:

- Location and orientation of building on Ocean Avenue with front façade facing west
- Rectangular building plan, height (two-story), and massing
- Symmetrical composition of front (west) façade and side elevations
- Stucco (non-lacy) sheathed exterior walls
- Flat roof with red clay barrel tiled parapet
- Front-facing gable roof element at west end of roof covered with red clay barrel tiles
- Shed roofs with red clay barrel tiles over front balconies
- Flanking balcony decks at front (west) façade, second-story
- Wood-framed French doors on front (west) façade

- Wrought iron balconettes at front (west) façade, second story
- Centered arched shaped main entry on front (west) façade
- Extended wing walls with arched shape openings and red clay tiled cap trim
- Fenestration: recessed casement, double-hung sash, and fixed-pane along front façade and side elevations (wood material, type, multi-pane, size and shape, placement, casings, and sills)
- Arched shape window and door openings

The period of the significance for the Spanish Colonial landmark building is 1926, the date it was constructed and retained all of its original architectural, stylistic features. For the purposes of CEQA compliance this property is considered a historic resource, as defined in the CEQA Guidelines.⁴⁰

Mixed-Use Property, 101 Santa Monica Boulevard (APN: 4291-014-025)

The altered Spanish Colonial Revival style commercial building located at 101 Santa Monica Boulevard has been previously identified and recorded for historical significance under prior City survey efforts. It was first surveyed as part of the reconnaissance level 1983 citywide survey (published as Phase 1 of the Santa Monica Historical Resources Inventory 1985-1986 Final Report). At that time the property was evaluated as potentially eligible for individual local designation and assigned a corresponding National Register Status Code of 5 (National Register Status Codes were amended in 2003 to the California Historical Resource Status Codes). It was also identified as a contributor to a potential locally eligible historic district, the Central Business District and was assigned a National Register Status Code of 5D. Between 1995 and 1998, the property was re-assessed for potential historical significance and its status as a contributor to the Central Business District was reconfirmed.⁴¹ As part of the reconnaissance level 2010 Santa Monica Historic Resources Inventory Update the property was once again identified and evaluated as a contributor to the potential Central Business District historic district. This finding was based on the previous reconnaissance level assessment findings with no reviews of building permits or consideration of historical integrity.

⁴⁰ *California Environmental Quality Act, Section 15064.5(a).*

⁴¹ *Parkinson Field Architecture and Janet Tearnen. Historic Resource Inventory Update Final Report, City of Santa Monica, 1995. Tearnen, Bricker, Field. Historic Resources Inventory Update for the City of Santa Monica, Central Business District and Third Street Promenade, June 1996-March 1998.*

The property was also identified in the City's Citywide Historic Resources Inventory Update – Downtown Community Plan Area report dated July 2017. The report findings referenced the preliminary results of the reconnaissance level 2018 Citywide Historic Resources Survey Update work and identified the 101 Santa Monica Boulevard property as eligible for local City of Santa Monica Landmark designation. Therefore, under the 2018 Citywide Historic Resources Survey Update the property is identified as “appears eligible for listing as a Santa Monica Landmark” as an excellent example of Spanish Colonial Revival architecture as applied to a commercial building. Its prior recognition as a contributor to the potential Central Business District historic district was removed as the district was found to lack sufficient integrity and was assessed as ineligible for local district designation. The contributing properties were then evaluated individually for historical significance.

As the property is not a formally designated City of Santa Monica landmark it will be assessed herein at an intensive level for the purposes of CEQA as part of this environmental review. The two-story commercial building with residential units on the second level was built in 1925. Located at the northeast corner of Ocean Avenue and Santa Monica Boulevard, the building had an original address range of 101-117 Santa Boulevard and 1355-1359 Ocean Avenue. The residential apartment portion of the structure on the second floor has an address of 1357 Ocean Avenue and was called the Dinmar Apartments.⁴² The property occupies four tied parcels with the commercial building situated at the southern end of site. The legal description of the property is “Lots M, N, O, and Lot P, Block 148 of the Town of Santa Monica Tract.”

Building Description

The property was designed by Los Angeles based architect A. H. O'Brien and was constructed by A.V. Perkinson, a Los Angeles contractor. Built with an “E” shaped plan with two narrow light courts that run north-south, the building is constructed of unreinforced masonry with plaster stucco sheathing the exterior walls of the primary south and west elevations. The improvement is bounded to the east by an alley, Santa Monica Boulevard to the south, Ocean Avenue to the west, and a paved parking lot to the north (also part of the property). The building is capped with a flat roof with parapet though its southwest corner is emphasized by a slightly raised partially tiled hipped roof, suggesting a tower. The main commercial spaces front along Santa Monica Boulevard and Ocean Avenue with secondary, utilitarian elevations along

⁴² Verified through Santa Monica City Directory listings, 1927-1961. The apartment portion was listed in the 1927 city directory as the Dunmar Apartments; however, by 1928 the name had changed to the Dinmar Apartments. A historical postcard also illustrates the property with a sign attached reading “Dinmar Apartment.”

the alley (east) and rear (north) of the structure. The entire building is currently referred to as Belle-Vue Plaza.

South Elevation

The south (primary) elevation fronting Santa Monica Boulevard is an asymmetrical arrangement of irregular shape altered storefronts along the street level and a linear series of sash window openings along the upper floor. This “front” façade is comprised of three sections with flanking (east/west) corner pavilions that have slightly elevated parapet walls and a center section demarcated by thirteen recessed sash windows, grille work, and a long horizontal decorative plaster band that visually separates the first and second floors. A continuous double string course defines a cornice frieze above the second floor. The parapet wall along this elevation is capped by a tiled shed roof coping accent.

At ground-level the individual storefronts that once punctuated this façade have been removed, infilled, reconfigured, and inappropriately redesigned. This lower level once contained ten large glazed storefronts some set on bulkheads with recessed entries and decorative mezzanine level clerestory transom windows. Three ground-level arched shaped openings at the eastern pavilion originally contained three separate shop units (113-115-117 Santa Monica Boulevard) that have since been modified into one space. Set above the arched openings are five windows with balconettes; the end windows are surmounted by a medallion.

The principal corner pavilion at the intersection initially extended slightly over the main recessed canted entry and featured a large decorative corbel drop. However, the upper portion of this corner has since been infilled but the canted entry orientation, although replaced and altered, remains. The south elevation of this western corner pavilion also has three second story windows with balconettes and end windows that are crowned by medallions.

West Elevation

The west façade of the building is also considered a primary elevation as it fronts onto Ocean Avenue and contains storefronts and access to the upstairs residential units. It is similar in composition, design, and alterations to the south side of the building though it is shorter in length. Composed of three sections the center segment is flanked (north/south) by corner pavilions with slightly raised parapet walls. Along the west elevation the hipped roof south (principal) pavilion at the intersection contains three sash windows with balconettes and end windows that are surmounted by medallions. The second level of the northern pavilion features four windows with balconettes with a rooftop penthouse addition (built in 1954) that contains several aluminum framed slider windows, wrought iron railings, and decorative (faux) medallions. The upper level of the center block is punctuated by seven recessed sash windows

as well as plastered grille work. Above the second floor is a continuous double string course that defines a cornice frieze as well as a parapet wall that is capped by a tiled shed roof coping accent.

The ground floor portions of this west elevation have also been altered, infilled, reconfigured and redesigned. This lower level was designed with a separate storefront with recessed entry and decorative mezzanine level clerestory transom windows in its northern bay (1355 Ocean Avenue), a separate and highly decorative arched shape entry opening with double doors to the residential lobby and second floor apartment units (1357 Ocean Avenue), and a bank of large glazed storefronts with decorative mezzanine level transom windows and a secondary side door that was part of the commercial space for 101-103 Santa Monica Boulevard. In addition, horizontal decorative molded bands enframed the upper portions of the mezzanine level clerestory fenestration for each of the storefronts.

Today, all of the decorative mezzanine level clerestory transom windows have been removed and infill; the storefront framing and glazing of the commercial space south of the apartment entrance has been removed, reconfigured, and redesigned; and the entry opening and door assembly to the upstairs residential units have been altered by the infill of the upper arched shape portion of the entryway, the removal of decorative plaster surrounds for the narrowing of the opening, and the reconfiguration and replacement of the original door and framing. Some of the horizontal decorative molded bands surmounting the storefront windows along this elevation remain partially intact.

North Elevation

The north elevation of the building is relatively unadorned with decorative ornamentation and stucco sheathing. It is utilitarian in design and function and serves as “back of house” for both the commercial and residential occupants. This secondary wall plane fronts onto a paved parking lot and is, therefore, devoid of fenestration but for the slider type windows punctuating the rooftop penthouse addition. Because of the building’s “E” shaped plan this elevation provides access to the two narrow light courts, secondary utility access for the restaurant tenants, and rooftop access via an exterior metal framed staircase. The brick walls of these light wells are also punctuated by sash windows that provide additional lighting into the upstairs apartment units.

East Elevation

The east elevation is minimally adorned with ornamentation as it is also utilitarian in design and function. This painted brick secondary side wall fronts onto an alley with an adjacent parking to the east. This elevation is defined by a series of sash frame windows of varying size

set in recessed slightly arched shaped openings at the second level. The southernmost bay (southeast corner) is finished in textured stucco as it is readily visible from the public right-of-way and wraps to the front of the building (south elevation). Within this bay is a large arched shape window opening with replaced window frame at ground-level and a sash window with non-original applied shutters surmounted by decorative banding at the parapet roofline. Set mid-way along this elevation also at ground-level is a large service dock that is enclosed by a metal screen (a trash dumpster and storage space are enclosed within this space). The northern end of this side elevation contains a narrow wood panel utility door with transom recessed within a slightly arched opening.

Property History

The subject property was constructed in 1925 on the western periphery of the developing downtown business district. The City's commercial district developed from roughly 1875 through the present day and chronicles the architectural and commercial evolution of Santa Monica. Beginning in the 1880s, the City's commercial area included Second Street from Utah (Broadway) to roughly a half block north. During the following decades Third Street became the city's principal commercial thoroughfare. The architecture of Third Street was primarily small scale brick vernacular commercial improvements of varying width. Facades were of various shades of brick with detailing in the form of glazed brick set into patterns in the surface. By 1888, a hotel and theater were built at the northeast corner of Third Street and Broadway. Within the next five years a number of architecturally distinctive commercial buildings of the period were built in the immediate vicinity. The City's commercial district continued to expand and evolve through the turn of the early part of the twentieth century primarily due to its prime beachfront location, arrival of the electric streetcar, and available real estate.

Santa Monica Boulevard (formerly Oregon Avenue), the thoroughfare where the subject property is located, was one of the City's early arterial streets and the principal access route from Los Angeles (prior to the freeway system). Several of the most well-known buildings in Santa Monica are located on this corridor, including the Mayfair Theatre at 216; the Art Deco style Bay Cities Guaranty Building at 221-225; the Juniper Building at 301; and Henshey's Department Store at 402 (now altered).

The 101 Santa Monica Boulevard property is situated at the intersection of Santa Monica Boulevard and Ocean Avenue. The building received little to no publicity in the local papers when it was built, though the *Santa Monica Evening Outlook* from April 29, 1926 noted that the Frank Meline Company, a large real estate business with its main office in downtown Los Angeles, leased the corner office space. As listed on the original 1925 permit, the property

owner at the time was S. Malsman. Solomon Malsman (1880-1970) was a Los Angeles based businessman and real estate broker who conducted business in the area from roughly the 1920s through to the mid-1940s. During this time the *Los Angeles Times* noted only a few real estate development transactions by Malsman, which were primarily in Los Angeles. The newspaper from April 1928 stated that he had become a board member of the newly formed Hollywood Boulevard Association.⁴³ No other relevant information on Malsman was found during this investigation to indicate he was a notable or significant individual in local history or otherwise.

The building was designed by Los Angeles based architect Arthur H. O'Brien (1877-1941) and was built by Al V. Perkinson (1873-1951), a building contractor in the Los Angeles area. O'Brien was born in Waukegan, Lake County, Illinois on December 5, 1877 to Michael and Sarah Clark O'Brien. In reviewing research data on O'Brien he was found living in Denver, Colorado as city directory listings from 1908-1913 and the 1910 US Census from Denver list his occupation as a draftsman/architect. By 1914, however, he had moved west to Southern California and continued working as a draftsman. *Los Angeles Times* articles from 1924 and 1925 note that O'Brien designed at least two buildings in Los Angeles, an apartment building and a commercial structure. It appears that O'Brien continued drafting until his death in San Francisco in 1941. As mentioned the builder of the subject property was Al Vernon Perkinson. He was born in Virginia on August 31, 1873, but moved to Los Angeles just after the turn of the twentieth century. He appears to have been rather active in the construction business during the first quarter of that century building commercial, residential, and factory buildings. The *Los Angeles Times* briefly references several projects primarily in the Los Angeles area from 1924 to 1930. His obituary in the *San Bernardino County Sun* newspaper from February 14, 1951, mentions that he was the building contractor for the Rose Bowl. In fact, Perkinson was contracted the construction of the south end addition of the bowl in the summer of 1927, which consisted of building two ground-level entrance tunnels at the southwest and southeast corners of the stadium.⁴⁴ Unfortunately, Perkinson went bankrupt in 1933, and the assets of his company were sold at auction.⁴⁵ Interestingly, following the Great Depression, A.V. Perkinson was listed in the 1940 US Census as living in Los Angeles with the occupation as building contractor. He eventually retired and passed away in Los Angeles at the age of 77 years.

As mentioned, the subject property was built as a two-story mixed-use commercial building with retail and office space fronting Santa Monica Boulevard and Ocean Avenue and a

⁴³ "Boulevard Group Forms," *Los Angeles Times*, April 22, 1928, E4.

⁴⁴ *Rose Bowl National Register Nomination*.

⁴⁵ "Auction Sale No. 2 Bankrupt Building Contractors Machinery & Equipment Assets of A.V. Perkinson, Inc." *Los Angeles Times*, October 22, 1933, 10.

multi-unit apartment house called the Dinmar Apartments on the upper floor (access off Ocean Avenue). The commercial spaces were configured with a series of shop units along Santa Monica Boulevard and a single commercial space along Ocean Avenue. Early occupants of these businesses units included the Frank Meline Company at the corner space (they were there for less than two years) and an awning maker, beauty shop, restaurant, and real estate office in the smaller tenant spaces. By 1928, the Santa Monica-Ocean Park Chamber of Commerce occupied one of the smaller office spaces along Santa Monica Boulevard, but by 1930 had moved to the larger corner space once occupied by the Meline Company. The Chamber of Commerce left the building altogether by 1933 and did not return until after World War II. In reviewing city directories from 1925 through at least 1960, the small commercial tenant spaces along both Santa Monica Boulevard and Ocean Avenue have contained a variety of businesses that include offices for the Young Man's Christian Association (YMCA), a real estate office, beauty shop, dressmaker, drapery business, attorney's office, candy store, hat shop (milliner), radio parts supplier, art supply shop, insurance agency, electrical parts store, National Cash Register Company (NCR) office, an American Red Cross office, and more. At the same time, the residential tenants of the Dinmar Apartments included short-term vacationers and some long-term blue and white collar workers as well as retirees and widows. The listings in the city directories indicate a rather high turnover of occupants for the apartment units as well as many of the tenants in the commercial spaces. The longest occupant in the building was a French café that occupied the prime corner space at the intersection. John James Wallace (1900-1982) who was born in Rennes, France established the Belle-Vue French Café at this location in 1937. Along with his wife Anne they operated one of the most popular restaurants in the city for decades offering unique continental fare. The Wallaces leased the commercial space at 101-103 Santa Monica Boulevard and resided upstairs at the Dinmar Apartments for many years. The Belle-Vue French Restaurant begun as a modest local eatery but the proprietors built it into a culinary destination with cocktail lounge and banquet room. In 1963, the restaurant was purchased by Eddie Piloni, a former chef, and his wife Stella. Four years later they brought in French-born chef Robert Laly to reinvent the menu by updating and expanding the French fare. The restaurant was temporarily closed in 1990 for a year as it was remodeled as a French brasserie. Only a few years later the Crocodile Café, "a young and trendy" restaurant, replaced the outdated Belle-Vue eatery. In 2004, the current tenant, Boa Steakhouse, opened in the space.

Property Architecture

In considering the property's architectural style the improvement is a substantially altered example of a Spanish Colonial Revival style commercial building. Period Revival styles, including the Spanish Colonial Revival style, grew in popularity just after World War I and were patterned after buildings of earlier periods in American and European architecture. Many

architects found Southern California the ideal setting for an architectural style that idealized and romanticized the Spanish colonial period in California and the Southwest. Numerous publications argued in favor of this style for the region's Mediterranean climate, including W. Sexton's *Spanish Influence on American Architecture and Decoration* of 1926, and Rexford Newcomb's *The Spanish House for America: Its Design, Furnishing, and Garden*, published in 1927. The style was also profiled in several periodicals of the time, including *The Western Architect*, *Sunset*, and *The Architect and Engineer*. In Southern California the Spanish Colonial Revival style flourished between 1915 and 1940, reaching its apex during the 1920s and 1930s.

The movement also received widespread attention after the 1915 Panama-California Exposition in San Diego, where lavish interpretations of Spanish baroque architecture known as Churrigueresque were showcased. The Churrigueresque style with its areas of intricate ornamentation juxtaposed against plain stucco wall surfaces and accented with towers and domes lent itself to monumental public edifices, churches, commercial buildings, and theaters, but was less suited to residential or smaller scale commercial architecture.

The popularity of the Spanish Colonial Revival style extended across nearly all property types, including a range of commercial, residential, and institutional buildings. The prevalent use of the style coincided with Southern California's popular boom of the 1920s, with the result that large expanses of Santa Monica, Los Angeles, and surrounding cities were developed in the idiom. The popularity and growth of the style helped to shape the region's expansion for nearly two decades, reaching a high point in 1929 and tapering off through the 1930s as the Great Depression gradually took hold. Like other revival styles, the Spanish Colonial Revival was often simplified or combined with design features of other Mediterranean regions such as Italy, southern France, and North Africa. Hallmarks of the Spanish Colonial vocabulary includes arch shaped doorways; asymmetrical facades; balconies and patios; window grilles; red clay tile roofs; stucco-finished walls; wood-framed casement windows with prominent lintels and sills; projecting vigas; fountains; and wood, wrought iron, tile or stone decorative elements.

Within the City of Santa Monica, particularly the downtown area, there are a number of better extant, intact commercial examples of the Spanish Colonial Revival style. Such properties include the Santa Monica Professional Building at 710 Wilshire Boulevard that was built in 1927. Designed by architect Arthur E. Harvey, the six-story building was planned to house medical professionals and attorneys and features Churrigueresque styling details of cast stone and molded concrete. Because of its well-executed architectural expression and property type the building was designated a Santa Monica Landmark in 2005. The Bay Builders Exchange Building (1928) at 1501-1509 4th Street, which is a designated City Landmark (2009), is also an intact example of the style and type located within the downtown area as are the 1928 Edwin Building, 312 Wilshire Boulevard, a designated City Landmark (2008); Tegner Building (1927) at

1433-1437 4th Street; and the Spanish Colonial Revival commercial building (1926) at 1337 Ocean Avenue, also a designated City Landmark. Additional intact, better examples of the Spanish Colonial Revival style outside the downtown area are evident in the Sovereign Hotel at 205 Washington Avenue (1927), which is a designated City Landmark and is listed on the National Register; the Parkhurst Building (1927) in the Ocean Park area of the city, 185 Pier Avenue, which is a designated City Landmark and is listed on the National Register; and the Embassy Hotel Apartments (1927), 1001 3rd Street, and also a designated Santa Monica Landmark property. As mentioned, the subject property located at 101 Santa Monica Boulevard is a significantly altered representative of the Spanish Colonial Revival style.

Integrity Assessment

While the improvement at 101 Santa Monica Boulevard does retain some decorative elements on the exterior the building has been extensively altered since it was erected in 1925. The most significant physical and visual alterations have been made to the lower half of the building's two-story primary south and west elevations. These two primary elevations do not retain sufficient integrity to articulate their original commercial design intent, which relied on visually distinct individual commercial spaces complemented by highly ornate Spanish Colonial Revival style exteriors and distinguishing storefront assemblies to draw customers in for business.

One of the most significant modifications to the exterior of the building occurred in the mid-1950s when much of the structure was remodeled and stylistically updated. In 1953, many of the storefronts were remodeled, including the corner space at 101 Santa Monica Boulevard, and removed original design features and materials, reconfigured storefronts, and incorporated several elements of modern design popular at the time. These changes drastically impacted the original design intent of the building and visually and physically altered the overall historical character of the structure. The addition of the rooftop penthouse in 1954 along the west parapet wall further compromised the historic qualities of the improvement. During the 1990s, the building underwent additional inappropriate remodeling to its south and west elevations for commercial tenant needs. The third phase of major alterations occurred to the building during the 2000s, when further modifications were made to many of the storefronts.

Building permits recorded with the City for significant exterior work made to the subject property over the years are summarized in the following table.

PERMIT HISTORY FOR SUBSTANTIAL EXTERIOR MODIFICATIONS
101 Santa Monica Boulevard

Significant Exterior Alterations Permit History	
Year	Description
1940	Alteration of café, first and second floor joists
1953	Remodel front of stores
1954	Build apartment-penthouse @ 3 rd floor
1955	New neon sign for apartments/restaurant
1957	Roof added over light-well, patios
1960	Sign permit for Belle-Vue restaurant
1960	Sandblasting of exterior surfaces
1961	Addition of wind walls on west side and for penthouse
1962	Sign permit for "Wallace Furnished Apartments" entrance added along Ocean Avenue elevation
1992	Remodel corner tenant unit
1996	Alteration to easternmost storefront on south elevation, including new storefront windows and transoms; alterations to southernmost window on east elevation, including new window in existing opening and new ceramic tile bulkhead below window; infill of existing window at east elevation with brick
1999	Install illuminated channel letter "night appearance" sign at corner
2004	Renovation of penthouse apartment on third floor
2004	Refinish first floor lobby, relocate two non-bearing partitions...repair patio deck windscreen
2007	Alterations of south elevation storefront to accommodate tenant improvements
2008	Alterations to south elevation storefront to accommodate tenant improvements, including addition of suspended metal canopy, aluminum frame transom above storefront, and new storefront doors
2009	Alterations to west elevation storefront to accommodate tenant improvements
2012-2013	Alterations to south elevation storefront to accommodate tenant improvements, including brick veneer, metal awning, metal railing for outdoor dining, signage, lighting, and closing one exterior opening
2017	Alterations to south elevation storefront to accommodate tenant improvements, including new awning, sign, opening in wall, and patio wall for outdoor dining
2017	Alterations to south elevation storefront to accommodate tenant improvements, including new paint, lighting, metal awning, signage, and railing for outdoor dining

The recorded building permits note significant exterior alterations have been made to the property, particularly the work conducted in the mid-1950s, 1990s, and 2000s has visually and physically altered the structure substantially. In addition, several other alterations that are not explicitly reflected in the permit record for the property are also visually and physically evident. Some of those later non-recorded changes made to the building include the addition of conjectural features, such as texture stucco and faux decorative trim features, to its exterior primary elevations (south and west) at the first floor level and upper penthouse floor. As such, the property also conveys a false sense of historicism.

Taken collectively, the significant alterations made to the building over the years have drastically diminished the important original historical characteristics that define it as a mixed-use Spanish Colonial Revival style commercial building. As such, the building has lost much of its historical integrity of design, workmanship, materials, association, and feeling. Its level (retention) of historical integrity, therefore, is very low.

Significance Assessment

The eligibility of the 101 Santa Monica Boulevard property as a potential historical resource was assessed by evaluating it against the criteria of the National Register and California Register, as well as the criteria for City of Santa Monica Landmark and Structure of Merit designation. As mentioned, the subject property no longer retains integrity of design, materials, workmanship, feeling, or association. The building; therefore, does not appear to be a significant example of architectural style, period, or type and no important historic associations have been discovered or are evident. Based on the analysis of this report, the 1925 mixed-use commercial building does not appear to be eligible for listing in the National Register, California Register, or as a City of Santa Monica Landmark or Structure of Merit. Hence, it does not appear to qualify as an historical resource under CEQA. The following discussion presents the findings to support this conclusion.

The subject property though associated with an earlier period of the City's economic, architectural, and residential development history does not accurately convey these historical associations due to compromised historic integrity. The property was built in 1925 in the Spanish Colonial Revival style as a mixed-use commercial building. However, because of numerous inappropriate modifications made to the exterior of the structure it no longer physically or visually expresses those important original design qualities associated with that period, style, or type. As previously discussed, many of the original features, materials, design and workmanship of the building have been removed, replaced, and/or altered in a manner that actually impacts the initial design intent and in some instances creates a false sense of historicism. Because of the extensive changes that have occurred to the building it no longer

accurately reflects, exemplifies, symbolizes, or manifests important elements of the city's history nor does it honestly represent important historical events that have made a significant contribution of the broad patterns of our history and cultural heritage.

In addition, the current survey investigation conducted and the research data collected and reviewed did not reveal any information to indicate that any of the former property owners, tenants, or residents should be considered historically significant or important in local, state, or national history.

As for architectural merit, the property is a substantially altered example of a Spanish Colonial Revival style two-story mixed-use commercial building. The 101 Santa Monica Boulevard property lacks sufficient integrity to accurately and fully convey its original highly ornate architecture or its original architectural intent to be eligible for listing on the National Register, California Register, or as City of Santa Monica Landmark or Structure of Merit. The property does not possess historical integrity or architectural significance as an exemplary, distinguishable or unique and rare representative of its type, period, or method of construction, nor does the sum of features that remain on the building possess substantive artistic or aesthetic value. There are better extant examples of the property type and style in the vicinity and the community, including the Santa Monica Professional Building (1928) at 710 Wilshire Boulevard; the Bay Builders Exchange Building (1928) at 1501-1509 4th Street; the 1928 Edwin Building, 312 Wilshire Boulevard; the Tegner Building (1927) at 1433-1437 4th Street; and the Spanish Colonial Revival commercial building (1926) at 1337 Ocean Avenue, which is adjacent to the subject property.

Further, the building does not represent the work of a master architect or builder. The architect A.H. O'Brien appears to have been a regional practitioner of Period Revival architecture in the Los Angeles area. Research indicates that he does not appear particularly notable in the architectural history of Santa Monica or Los Angeles. Contractor A.V. Perkinson appears to have been a competent builder in a variety of architectural styles and property types, judging by the historic appearance of the subject property, the work completed for the Rose Bowl addition in 1927 in which he was contractor, and the other known works attributed to him in the southland area. The professional portfolio of work for either the architect or builder is not well documented in any publications reviewed during the current survey process. As a result it cannot be concluded that O'Brien or Perkinson were notable, master practitioners working in Santa Monica or the greater Los Angeles area.

And while the building is located on a corner at the intersection of Santa Monica Boulevard and Ocean Avenue, it does not in itself qualify the property as being in a unique location. The mere fact that the building is located at this intersection does not necessarily

establish a nexus for historical significance. Both Ocean Avenue and Santa Monica Boulevard are highly traveled thoroughfares in the downtown area. However, because of the building's low height and massing as well as significant alterations, particularly along the ground-level storefront elevations its prominence as an established and familiar visual feature is greatly diminished. The building is no longer a well-executed architectural design or style and because of the inappropriate modifications that have occurred to the structure over the years it now blends in with the surrounding streetscape and commercial blocks.

2. EVALUATION OF HISTORIC RESOURCES ADJACENT PROJECT SITE

In total, five (5) properties within the survey study that are adjacent to the Project site were also assessed for historical significance as part of this environmental review. Those properties that warranted further review adjacent to the Project Site include the following:

Commercial Property, 1402 Second Street (APN: 4291-015-001)

The altered one-story, flat roof commercial building located at the southwest corner of Second Street and Santa Monica Boulevard has not been formally assessed for historical significance under any of the city's prior survey efforts. The legal description of the property is "Lot A, Block 173 of the Town of Santa Monica Tract." According to Los Angeles County Assessor records the building dates to 1925, as no original permits are on file with the City. In reviewing city directory listings and Sanborn maps, it appears the structure has an earlier construction date and is estimated at circa 1910.

Property Description and History

The rectangular shape, unreinforced masonry vernacular structure originally contained individual shop spaces along Santa Monica Boulevard and 2nd Street. Early on the local newspaper business The Daily Outlook and the Santa Monica Bay Printing and Publishing Company, established in February 1910, shared an address space at 124 Santa Boulevard (originally Oregon Avenue) for many years. The two adjacent small shop spaces initially addressed as 124 and 128 Santa Monica Boulevard contained real estate offices. At the time, three shop spaces fronted on to 2nd Street: 1400, 1402 and 1404 2nd Street. The Santa Monica Water Company occupied the corner unit at 1400 2nd Street. Over the years, the shop spaces were reconfigured and the exterior of the building remodeled for the ever-changing tenants that occupied the building. In 1974, the entire building was modified for one business, the Ye Olde King's Head Shoppe, a restaurant, pub, and gift shop. The exterior of the building was remodeled with faux Tudor inspired features such as half timbering, shingled mansard roof, quoining details, wood panel bulkhead storefronts with multi-paned windows, and brick veneer

trim accents. Though conveying a false sense of historicism, the building continues to reflect the Tudor style architecture that was intentionally designed to match its occupants business.

Significance Assessment

The eligibility of the 1402 2nd Street property as a potential historical resource was assessed by evaluating it against the criteria of the National Register and California Register, as well as the criteria for City of Santa Monica Landmark and Structure of Merit designation. The building no longer retains sufficient historical integrity as it has been extensively modified over the years. It does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the commercial property located at 1402 2nd Street does not appear to be eligible for listing in the National Register, California Register, or as a City of Santa Monica Landmark. For the purposes of CEQA compliance, it is not considered an historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

Commercial Property, 202 Santa Monica Boulevard (APN: 4291-016-018)

The altered two-story commercial building located at the southeast corner of Second Street and Santa Monica Boulevard has not been formally assessed for historical significance under any of the city's prior survey efforts. The legal description of the property is the "Southwest 50 feet of Lots V & W and Lot X, Block 172 of the Town of Santa Monica Tract." According to Los Angeles County Assessor records the building dates to 1930, as no original permits are on file with the City. In reviewing city directory listings and Sanborn maps, it appears the structure has an earlier construction date and is estimated at circa 1916.

Property Description and History

The large, two-story building was initially built with two ground-level shop units fronting Santa Monica Boulevard (202 and 204 Santa Monica Boulevard) and meeting rooms and office space upstairs (204½ Santa Monica Boulevard). By 1917, the occupants of the building were the Southern California Edison Company (SCE) at street level with the upstairs used as a Masonic Temple. A few years later, the property was listed in the city directory as the Edison Building. By 1927, attorney offices and the Knights of Columbus were occupying the second floor of the structure with SCE and a paint shop below (a year later SCE and Knights of Columbus both relocated elsewhere out of the building). The 1950 Sanborn map shows the entire exterior of the building remodeled as well as the interior space reconfigured to include two small shop spaces along 2nd Street (1403 and 1405 2nd Street). In more recent years, the building was "modernized" and extensively remodeled again with an additional shop space added at 1401 2nd Street. The building now features new stucco sheathing, tiled "faux" mansard

roof parapet, anodized aluminum storefront assemblies, replaced windows within arched shape insets and engaged planter boxes at the second floor, and a two-story contemporary addition at its south end.

Significance Assessment

The eligibility of the 202 Santa Monica Boulevard property as a potential historical resource was assessed by evaluating it against the criteria of the National Register, California Register, and City of Santa Monica Landmarks criteria. The building no longer retains sufficient historical integrity as it has been extensively modified over the years. It does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the commercial property located at 202 Santa Monica Boulevard does not appear to be eligible for listing in the National Register, California Register, or as a City of Santa Monica Landmark. For the purposes of CEQA compliance it is not considered an historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

Commercial Property, 1332 Second Street (APN: 4291-014-008)

The altered commercial building located adjacent the project site along the west side of Second Street north of Santa Monica Boulevard has not been formally assessed for historical significance under any of the city's prior survey efforts. The legal description of the property is the "Lots G and Lot H, Block 148 of the Town of Santa Monica Tract." According to the original building permit and Los Angeles County Assessor records the building was constructed in 1969.

Property Description and History

The large volume building opened as the "Monica," a twin screen movie theater, on February 18, 1970 with the showing of the film "Oliver!" According to the original permit it was built for Laemmle Theatres at a construction valuation cost of \$290,000 and was designed by local architect Stanley Borbals. The building featured a rectangular plan with a front (east) façade composed of two bulky blocks, one slightly set back from the public sidewalk. Much of the building was devoid of fenestration with the south block carrying the expansive illuminated marquee and street-side movie poster display cases on the exterior of the east elevation along 2nd Street. The integrated ticket booth, entrances, lobby, and concession area were within the adjacent block that was approached via a series of double doors set between glass-filled elongated pilasters. The building was constructed of concrete masonry block units and sheathed with plaster. With a flat roof with parapet, the building otherwise lacked any decorative or architectural ornamentation. In June 1981, the theatre was converted as a four-plex movie house. Of the two big auditoriums the largest one was converted into three small

auditoriums, the interior lobby area was remodeled, and the ticket box and entries along the east elevation were slightly modified at this time. The theater closed in the summer of 2014 for remodeling and re-opened in early 2016 as the Laemmle Monica Film Center with six modernized theaters, a redesigned and reconfigured contemporary front (east) façade, separate restaurant space approached from the street, and another restaurant on the structure's enhanced rooftop.

Significance Assessment

The eligibility of the 1332 2nd Street property as a potential historical resource was assessed by evaluating it against the criteria of the National Register, California Register, and City of Santa Monica Landmarks criteria. The building no longer retains sufficient historical integrity as it has been extensively modified in recent years. It does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the commercial property located 1332 2nd Street does not appear to be eligible for listing in the National Register, California Register, or as a City of Santa Monica Landmark. For the purposes of CEQA compliance it is not considered an historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

Commercial Property, 1323 Ocean Avenue (APN: 4291-014-019)

The Queen Anne style building located at 1323 Ocean Avenue, referred to as the Gussie Moran House, was designated a City of Santa Monica Landmark on January 8, 1986. The house is remarkable both for its Victorian-era Queen Anne style and as the longtime residence of tennis champion Gertrude "Gussie" Moran (1923-2013). The legal description of the property is Lot T, Block 148 of the Town of Santa Monica Tract. According to county assessor records the building dates to 1870, as no original permits are on file with the City. The early Sanborn maps reveal that the residence was built between the years 1887-1891 and that the tower was added later, between 1891 and 1895. The 2018 citywide historic resources inventory survey update notes the built date of 1891 for the property. The building was originally designed as a single-family residence, but decades later it was converted to commercial use. According to the landmark designation Statement of Action (STOA) the Queen Anne style structure satisfied Landmark Criteria 1, 2, 3, and 4, as follows:

The structure exemplifies and manifests elements of Santa Monica's cultural and architectural history in that it is the last remnant of Victorian Santa Monica prior to 1900 on Ocean Avenue. The house has aesthetics and artistic value to the community of Santa Monica in that it is one of the last examples of Queen Anne revival architecture in the City and is located at its original site. In addition, it is identified with an historic person in

local, state, and national history in that the house was the family home and residence for many years of internationally known tennis player Gussie Moran. The property also embodies distinguishing architectural characteristics valuable to a study of a period, style, or method of construction in that it is one of the last examples of Queen Anne revival architectural in the City.

Based on the 2018 citywide survey update the City's HRI, the period of the significance for the Queen Anne landmark building is 1891, the date it was constructed and retained all of its original architectural, stylistic features. Character-defining features of the property include, but are not limited to, its overall quintessential type, shape, and massing that epitomizes the design principles of the Queen Anne style; tall, shingled conical tower; steeply pitched front-facing gable; bands of plain and fish scale shingles and stringcourse at the gable face; stickwork kingpost and collar beam in the front gable apex; exterior shiplap siding; pent roof between the first and second floors that shelters the front porch; elongated sash windows with plain surrounds; paneled and glazed front door; recessed "L" shape front porch with wood posts and cladded rail wall; and brick chimney; among other features.

The 2018 citywide historic resources inventory survey update also notes the property is eligible for listing in the National Register and California Register. For the purposes of CEQA compliance this property is considered a historic resource, as defined in the CEQA Guidelines.⁴⁶

Public Park, 100-1500 blocks of Ocean Avenue (APN: 4291-032-905)

Referred to as Palisades Park, the public park is a cultural landscape that spans 15 blocks along the west side of Ocean Avenue from Colorado Avenue to the northern boundary of the city near San Vicente Boulevard and Adelaide Drive. It was previously identified, evaluated, and recorded in 1986. At that time, the park, also known as Linda Vista Park, was found eligible for listing in the National Register as being one of the oldest public parks gifted to the city by early community founders, Senator John P. Jones and Mrs. Arcadia de Baker, in 1892.

The historic cultural landscape was surveyed again in 1998 for National Register eligibility under a Section 106 compliance review and its eligibility for the National Register under Criterion A was reconfirmed. As being formally eligible for listing on the National Register it was automatically included in the California Register. The property was later surveyed as part of the Santa Monica Pier Bridge Project in 2005. Its National Register eligibility was once again reconfirmed. Palisades Park was officially designated a City of Santa Monica Landmark in 2007 for its important associations with the cultural, recreational, political, and architectural history

⁴⁶ *California Environmental Quality Act, Section 15064.5(a).*

of the City, as well as for its direct connection with important personages. In its landmark nomination the period of the significance was identified as 1892 to 1957. Under the 2018 citywide survey update the park was identified as eligible for listing in the California Register and was reconfirmed as a designated Santa Monica Landmark. For the purposes of CEQA compliance this property is considered a historic resource, as defined in the CEQA Guidelines.⁴⁷

3. SUMMARY FINDINGS OF HISTORIC RESOURCES EVALUATED

The survey study area contains four (4) properties that are considered historical resources under CEQA. The following table summarizes the results of the evaluation for those properties within the survey study area that were assessed for historical significance. Only those properties identified in the table below with a status code of “5” and/or “3” are considered historical resources pursuant to the CEQA Guidelines.

PROPERTIES EVALUATED WITHIN SURVEY STUDY AREA

Description	Address/Location	Built Date	Status Code
Properties within Project Site			
Mixed-Use Commercial Building	1327 Ocean Avenue	1951	6Z
Commercial Building	1333 Ocean Avenue	1906/1941	5S1
Commercial Building	1337 Ocean Avenue	1926/1951	5S1
Mixed-Use Commercial Building	101 Santa Monica Boulevard	1925	6L
Properties Adjacent to Project Site			
Commercial Building	1402 2 nd Street	1925	6Z
Commercial Building	202 Santa Monica Boulevard	1930	6Z
Commercial Building	1332 2 nd Street	1969	6Z
Commercial Building	1323 Ocean Avenue	c.1887-1891	3S, 3CS, 5S1
Public Park	100-1500 blocks Ocean Ave (west side)	1892	5S1
<p>KEY-CALIFORNIA HISTORICAL RESOURCE STATUS CODES:</p> <p>3S: Appears eligible for National Register as an individual property through survey evaluation.</p> <p>3CS: Appears eligible for California Register as an individual property through survey evaluation.</p> <p>5S1: Individual property that is listed or designated locally.</p> <p>6L: Determined ineligible for local listing/designation; may warrant special consideration in local planning.</p> <p>6Z: Found ineligible for National Register, California Register, or local designation through survey evaluation.</p>			

⁴⁷ California Environmental Quality Act, Section 15064.5(a).

5. ANALYSIS OF PROJECT IMPACTS

A. CEQA SIGNIFICANCE THRESHOLDS

1. CEQA GUIDELINES

Under CEQA, a proposed project must be assessed to determine how it may impact the potential eligibility of a property identified as a historic resource. The thresholds for determining the significance of environmental effects on historical resources are derived from the State *CEQA Guidelines*, as defined in Section 15064.5. The *CEQA Guidelines* state that a project involves a “substantial adverse change” when one or more of the following occurs:

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.⁴⁸
- The significance of a historical resource is materially impaired when a project:⁴⁹
 - a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
 - b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
 - c. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

⁴⁸ State *CEQA Guidelines*, 14 CCR Section 15064.5(b)(1).

⁴⁹ State *CEQA Guidelines*, 14 CCR Section 15064.5(b)(2).

As such, substantial adverse effects may include, but are not limited to, physical destruction or damage to all or part of a historic property caused by vibration and/or sound; removal of the property from its historic location; isolation from or change of features within the property's historic setting; visual, atmospheric or audible intrusions; foreseeable effects that may occur later in time or farther removed in distance; and cumulative effects.

To be eligible for listing in the National Register and California Register, and as applied at the local level (City of Santa Monica), a property must not only be shown to be historically significant under the applicable criteria (federal, state and local), but it must also have integrity. Integrity is defined as the ability of a property to convey its significance. Pursuant to CEQA, projects that may compromise the integrity of a property, and therefore, compromise its historical significance may be adverse.

The *Secretary of the Interior's Standards for Rehabilitation* (SOI Standards) are codified at 36 Code of Federal Regulations (CFR) Section 67.7. The SOI Standards are designed to ensure that rehabilitation of a historic property does not impair the significance of the resource. In most circumstances, the SOI Standards are relevant in assessing whether there is a substantial adverse change under CEQA. Section 15064.5b(3) of the CEQA Guidelines states in part that "... a project that follows the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995; rev 2017), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource."

2. SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATION

As stated above, projects that may affect historic resources are considered to be mitigated to a level of less than significant, if they conform to the SOI Standards. Projects with no other potential environmental impacts qualify for a Class 31 exemption under CEQA if they meet the SOI Standards.⁵⁰

The definition of "rehabilitation" assumes that at least some repair or alteration of a historic property will be needed in order to provide for an efficient contemporary use or maintain its historic use. However, these repairs and alterations must not damage or destroy materials, features, or finishes that are important in defining a property's historic character and significance.

⁵⁰ 14 CCR Section 155331.

The ten standards for rehabilitation are as follows:

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

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The SOI Standards were developed by the NPS to assist property owners and managers in rehabilitating their historic properties. The SOI Standards contain a specific hierarchy for decision-making in assessing the rehabilitation of any historic building. First, the significant materials and features of a property must be identified. Then a method for their retention and preservation must be found. If the physical condition of character-defining materials warrants additional work, repair is recommended. If deterioration or damage precludes repair, then replacement can be considered.

In addition to the rehabilitation of character-defining features, the SOI Standards also address alterations and additions to historic properties, as well as retrofitting properties for health and safety requirements. Some alterations to a historic property may be needed to assure its continued use; however, these modifications should not obscure or destroy important character-defining features of the property or jeopardize those qualities that justify or convey the property's historical significance.

3. METHODOLOGY

Under CEQA, a proposed development must be evaluated to determine how it may impact identified historic resources or the potential eligibility of a structure(s) or a site for designation as a historic resource. Based on CEQA Guidelines, Section 15064.5(b)(2) presented herein this document, for purposes of this analysis the proposed Project would have a significant impact on historic resources if it would demolish, destroy, relocate, or alter a historical resource or its setting that its historical significance or integrity as a historical resource would be materially impaired, rendering it no longer a historic resource or eligible historic resource. The analysis of the proposed Project's potential impacts on historic resources is based on a review of the proposed project plans and supporting material, including the following reports:

- Historic Resource Assessment Comprehensive Update Report: 101 Santa Monica Boulevard, Santa Monica, California, prepared by Chattel, Inc. | Historic Preservation Consultants (Chattel), March 5, 2018.
- 101 Santa Monica Boulevard-Comparison with Like Properties Memorandum, prepared by Chattel, Inc. | Historic Preservation Consultants (Chattel), June 26, 2018.

- Ocean Avenue Project, Santa Monica, California: Conformance Recommendations Memorandum, prepared by Chattel, Inc. | Historic Preservation Consultants (Chattel), October 8, 2019 (updated November 26, 2019; January 27, 2020).
- City Landmark Evaluation Report, Commercial (Residential) Property, 1333 Ocean Avenue, Santa Monica, California, prepared by PCR Services Corporation, 2001.
- City Landmark Evaluation Report, Commercial (Residential) Property, 1337 Ocean Avenue, Santa Monica, California, prepared by PCR Services Corporation, 2004.

A general survey of the Project site and immediate vicinity was undertaken for the purpose of analyzing potential direct and indirect project impacts to historical resources. Conceptual proposed Project plans were reviewed for conformance with the SOI Standards and compliance with the CEQA Guidelines, Section 15064.5, particularly with regard to proposed changes to the identified historical resources within the Project site under SOI Standards 1 through 8, and also with regard to the compatibility of the proposed Project with the existing historical resources on the Project site as well as those resources adjacent the Project site within the survey study area under SOI Standards 9 and 10, as discussed in greater detail in the following narrative.

B. DOWNTOWN COMMUNITY PLAN

The adopted MMRP from the DCP Program EIR includes a mitigation measure for addressing historical resources - DCP MM CR-1: Historic American Building Survey (HABS) Documentation. However, this mitigation measure is not applicable since it pertains to demolition and alteration of a historic resource that cannot comply with the SOI Standards. Under the proposed Project, the associated historical resources would be retained, relocated, rehabilitated and adaptively used pursuant to the SOI Standards, as addressed in the following narrative and as described in the Conformance Recommendation Memorandum prepared by Chattel, Inc. Additional assurance for compliance with the SOI Standards would occur in association with the City's Landmark Commission's review of the Project for issuance of a Certificate of Appropriateness for the on-site designated Landmark buildings (or other such process as may be specified in the Development Agreement for the Project).

C. PROJECT OVERVIEW

As further described in Chapter 2.0, Project Description, of the Draft EIR, the Ocean Avenue Project would involve the redevelopment of an approximately 1.89 acre site at the corner of Ocean Avenue and Santa Monica Boulevard in the City of Santa Monica. The mixed-

use Project would include a hotel, residential apartments, cultural uses, a roof-top public observation deck, restaurant/retail uses, open space, and subterranean parking.

The proposed Cultural Use Campus would include the relocation, rehabilitation and adaptive use of two existing City-designated Landmark properties located on the northern portion of the Project site along Ocean Avenue (1333 and 1337 Ocean Avenue), as well as the construction of a new building located behind (east) the Landmark properties and four additional buildings to the south and southeast of the historic resources. The rehabilitation of the two Landmark properties would retain, repair as necessary, and restore as applicable, those important character-defining features that qualify the properties for City of Santa Monica Landmark designation.

Proposed Project development would require excavation of up to 35 feet for the proposed subterranean levels, the demolition of two existing commercial buildings (1327 Ocean Avenue and 101 Santa Monica Boulevard) and associated paved parking areas, and the removal of the existing ornamental landscaping currently on the Project site. The southern portion of First Court Alley, which currently traverses through the site in a north/south direction and provides a mid-block connection between Santa Monica Boulevard and Arizona Avenue, would be vacated and repurposed as a pedestrian-oriented public paseo and loading zone. In its place, the proposed Project would provide a new driveway from First Court Alley heading east along the northern portion of the Project site towards Second Street (where First Court Alley would terminate), permitting vehicular egress from First Court Alley onto Second Street.

D. PROJECT OBJECTIVES

As required under Section 15124(b) of the State *CEQA Guidelines* the objectives for the proposed project as identified by the applicant include the following:

- Historic Preservation, Adaptive Use, Culture: Preserve and rehabilitate in-kind the two City-designated Landmark properties on the Project site (1333 and 1337 Ocean Avenue) and adaptively use them pursuant to the SOI Standards, the Historic Preservation Element (part of the General Plan), and the City's Landmarks Ordinance.
- Arts and Cultural Benefits: Add culturally-rich uses in the Downtown, including adding a Cultural Use Campus to the Project site that incorporates the two City-designated Landmark buildings that would be preserved, rehabilitated in-kind, and adaptively used for cultural uses.

- Sustainability: Retain and ensure the preservation of the two City designed Landmark buildings and incorporate Green Building design features in the Project that also prioritize water and energy conservation.
- Economic Viability: Make the rehabilitation, in-kind repair, restoration and code-compliance upgrading of the two City-designated Landmark buildings and establishment of new cultural uses within the new cultural use campus economically feasible through pursuit of a financially viable mixed-use project that includes a hotel, replacement rent-controlled units, additional affordable and market rate rental housing units, and other pedestrian-oriented uses (i.e. retail, restaurants, and similar uses) that complement the hotel and residential uses.
- LUCE and DCP Consistency and Implementation: Develop the Project through the Development Agreement process that is consistent with and implements the City's Downtown Community Plan (DCP) and the Land Use and Circulation Element (LUCE), including high-quality architectural design, sustainability, visitor serving, residential and pedestrian oriented ground floor uses, publicly accessible open space, transportation demand management, historic preservation and adaptive use of historic properties, and overall community benefit.
- Coastal Act Consistency and Implementation: Develop the Project with a significant lodging/hotel component; culturally rich uses; and publicly accessible open spaces, including a rooftop observation deck and other visitor-serving uses consistent with the California Coastal Act's policies favoring visitor-serving uses in the Coast Zone.
- Architectural Design: Ensure that the new buildings achieve excellence in their architectural and urban design, incorporate an urban form and building character that enhance the existing Downtown fabric, and ensure the new buildings are well-integrated and compatible with the two identified City-designated Landmark buildings that are proposed for preservation, rehabilitation, and reuse as part of the proposed Project.
- Pedestrian-Orientation: Prioritize the pedestrian experience within and adjacent to the Project site by adding pedestrian-oriented uses along Second Street, Santa Monica Boulevard, and Ocean Avenue, as well as minimizing vehicle-pedestrian conflicts by reducing the existing curb cuts to one access point from the alley and one exit point on Second Street, add inviting pedestrian paseos, and incorporate sufficient open space to and through the Project site.

- Affordable and Market-Rate Housing: Consistent with the City’s Housing Element and DCP, replace the Project site’s existing rent-controlled housing units and provide additional rental housing units, including deed-restricted affordable rental housing and market-rate housing on the Project site, which is situated in a transit-rich location.
- Minimize Traffic Impacts: Develop a hotel, which is an off-peak trip generator, in the Downtown urban environment with convenient access to public transit and a wide variety of complementary uses within easy walking distance of the Project site. Minimize vehicle miles traveled by implementing a comprehensive Transportation Demand Management (TDM) strategy that includes incentives for alternative transportation modes (public transportation, bicycling, and walking), ride-sharing, and flexible work hours.
- Enhance Downtown: Enhance Santa Monica’s Downtown area by adding culturally-rich uses, publicly accessible open space, affordable and market rate housing, retail businesses and other complementary , and restaurant and entertainment uses, as well as a full-service hotel that does not displace any existing lodging facilities that are nearby.
- Employment, Economic, and Fiscal Benefits: Contribute to the economic health of the City by developing a project that generates significant new local tax revenues, provides new jobs such as a labor union-friendly hotel, and generates new visitor spending to support local business, including dining, shopping, and entertainment venues.
- Community Benefits: Provide the “preferred” community benefits for this site as envisioned in the LUCE and DCP, including affordable housing, a cultural institution and historic preservation, as well as a range of additional benefits such as publicly accessible open space, iconic architecture, transportation demand management, and sustainability.
- Parking: Remove existing paved surface parking and provide parking for the Project in a new subterranean parking facility.

E. PROJECT COMPONENTS

The development of the proposed Project provides for several components that include new construction; creation of a cultural campus for the adaptive use of existing on-

site historic resources; open space and public amenities; architecture and design; site access, circulation, and parking; requirements for utilities and services; provisions of a development agreement; and incorporation of sustainable features. Specific project components that are relevant to this historic resources assessment are presented in the following paragraphs.

1. NEW HOTEL BUILDING

The proposed hotel would include 12 stories rising to 130 feet in height and would also have below grade facilities. The full-service hotel would include a hotel lobby and bar, a hotel restaurant, meeting and banquet space, a pool deck, and a hotel spa. The main hotel entrance and ground floor lobby would be accessed from the proposed public paseo between the new hotel building and the proposed Santa Monica Boulevard building. Ground floor hotel restaurant/retail would front Ocean Avenue and may include outdoor seating. A service elevator off the ballroom lobby would connect the entire hotel with below grade floor area that includes back-of-house uses, electrical rooms, bicycle storage, and employee locker and shower facilities. Above floor level 12 the hotel would feature a 5,000 square foot publicly accessible rooftop observation deck providing panoramic views of downtown Santa Monica, Santa Monica Pier, Santa Monica State Beach, Palisades Park, the Santa Monica Mountains, and the Pacific Ocean. Access to the public observation deck would be provided via a single elevator accessed by an observation deck lobby sited off the paseo proposed for Ocean Avenue.

2. NEW CORNER BUILDING

The proposed two-story corner building would be located at the intersection of Ocean Avenue and Santa Monica Boulevard. It would provide restaurant/retail uses on both the ground-level and second floor. The new corner building would be bordered to the north by the proposed pedestrian-only paseo that stems from Ocean Avenue into the site, to the east by the proposed breezeway, and to the south and west by sidewalks along Santa Monica Boulevard and Ocean Avenue. The maximum height of the new improvement would be 55 feet tall.

3. NEW MIXED-USE RESIDENTIAL BUILDINGS

The proposed Project includes the development of two new mixed-use residential buildings, the Santa Monica Boulevard Building and the Second Street Building. The proposed buildings would be situated along Santa Monica Boulevard and would include ground floor restaurant/retail uses with access from Ocean Avenue, Santa Monica Boulevard, Second Street, and the proposed pedestrian-only paseos and breezeway. The Project's restaurant/retail uses

would be distributed between all five new buildings, including the two mixed-use residential buildings.

The Santa Monica Boulevard Building would be located to the west of First Court Alley and the east of Corner Building along Santa Monica Boulevard. Approximately 62 feet maximum height with five stories it would contain residential units and restaurant/retail uses. The Second Street Building would be located on the corner of Santa Monica Boulevard and Second Street. The building would extend to a maximum height of 106 feet with three separate structures (Structure A, B, and C) rising above the second floor podium deck. Structure A would be nine stories (106 feet), Structure B would be four stories (53 feet), and Structure C would be eight stories (97 feet). The primary lobby and entrance for the residences would be situated on the ground-level on the west side of the building, fronting the proposed pedestrian-only paseo at Santa Monica Boulevard. The Second Street Building would be bordered on the north by the subterranean parking garage exit and the reconfigured segment of First Court Alley, a new driveway that would connect First Court Alley to Second Street, and the pedestrian-only paseo at Santa Monica Boulevard to the west.

4. CULTURAL USE CAMPUS

The proposed Cultural Use Campus would be located at the north end of the Project site and would front on a public courtyard that would open onto Ocean Avenue. The Cultural Use Campus would consist of three structures, including a new cultural use building and two relocated and adaptively used City-designated Landmark buildings currently located at 1333 and 1337 Ocean Avenue.

This new cultural use building would border the proposed hotel to the south and First Court Alley to the east, adjacent to the entrance to the proposed subterranean parking garage accessed from First Court Alley. The new cultural use building would be a maximum of 60 feet in height with two stories above-grade featuring cultural uses such as art galleries, museum exhibits, or conservatories. Designed as a contemporary style building (yet compatible with the two historic landmark buildings), it would also include approximately 18,400 sf of below-grade floor area for additional galleries and back of house cultural uses. A lobby entrance to the cultural use building would be located between the two City-designated Landmark buildings, with access to stairs and an elevator to provide access to upper and subterranean levels. A ground-level public courtyard in front of the cultural use building and adjacent to the hotel would be open to and accessible from Ocean Avenue to encourage pedestrian activity at the Project site. A separate lobby entrance off the public courtyard between the Hotel Building and the southernmost City-designated Landmark building would provide access to an elevator and

stairs to a rooftop courtyard, which would be available to guests for special cultural use events such as Founders' dinners, artist talks, or opening events.

The City-designated Landmark buildings currently located at 1333 and 1337 Ocean Avenue would be relocated, rehabilitated, and sympathetically incorporated on the west side of the new cultural use building, facing Ocean Avenue. Rehabilitation of these buildings would include seismic and structural retrofitting; handicap accessibility improvements, where feasible; fire-life safety improvements; and upgrades to mechanical, electrical, and plumbing equipment. All work would be performed in accordance with the SOI Standards and the California Historical Building Code (CHBC). The rehabilitated City-designated Landmark buildings would then be adaptively reused for prominent new functions (e.g., gallery, retail, museum ticketing, guest bag check, etc.) and integrated into the Cultural Use Campus. A stairway located adjacent to the ticketing and bag check area on the northern portion of the site would provide access to the subterranean levels.

5. OPEN SPACE AND PUBLIC AMENITIES

The Project would include areas of open space at the ground floor that would be accessible to the public. Ground-level publicly-accessible open space would be provided across the public courtyard, the Ocean Avenue Paseo, the breezeway, and the Santa Monica Boulevard Paseo. These areas of open space would be activated by the proposed restaurant, retail, and cultural uses. All ground-level open spaces would include ornamental landscaping and be gently sloping (<5% grade) designed to comply with the Americans with Disabilities Act (ADA) and invite pedestrian orientation and circulation. Shady seating or rest spots throughout the ground-level open space would create a welcoming, comfortable experience for all users. The proposed rooftop observation deck accessible to the public on top of the hotel is also considered open space/public amenities.

A public courtyard along Ocean Avenue ranging in width from approximately 25 feet to 40 feet would provide access to the hotel's restaurant/retail amenities (including outdoor dining) and access to the Cultural Use Campus rooftop terrace (for museum guest/special events only), as well as viewing access to the southern-façade of the City-designated Landmark building currently located at 1333 Ocean Avenue. The public courtyard would be framed by the hotel on the south, the new building of the Cultural Use Campus to the east, the relocated 1333 Ocean Avenue City-designated Landmark structure to the north, and Ocean Avenue on the west, and would include landscaping and seating to encourage pedestrian enjoyment of the Project site. On its northern end, the public courtyard would connect to a walkway leading to the museum entrance off Ocean Avenue (between the two relocated City-designated Landmark buildings).

The Ocean Avenue Paseo would be an east-west oriented pedestrian-only paseo ranging from approximately 20 to 50 feet in width that would extend for approximately 170 feet from Ocean Avenue, between the Hotel Building and the Corner Building and Santa Monica Boulevard Building, to the terminus of the paseo at the Second Street Building. The Santa Monica Boulevard Paseo would be a north-south oriented pedestrian paseo ranging from approximately 20 to 40 feet in width that would extend along the vacated portion of First Court Alley for approximately 130 150 feet from Santa Monica Boulevard, between the Second Street Building and the Santa Monica Boulevard Building, to the paseo terminus at the service gates at First Court Alley. The connection of the Ocean Avenue Paseo and the Santa Monica Boulevard Paseo would create an “L”-shaped plaza to provide pedestrian access to and through the Project site. In addition, a breezeway of approximately 10 feet in width would separate the Corner Building and the Santa Monica Boulevard Building, connecting pedestrians from Santa Monica Boulevard to the Ocean Avenue Paseo.

6. PROJECT ARCHITECTURE AND DESIGN

The proposed Project would employ a variety of architectural techniques and materials to reduce visual bulk and create compatibility with existing development in the vicinity. The Project design is intended to complement the existing urban patterns found in the Downtown District through building siting and orientation; building mass modulation; location of uses and program; and preservation and adaptive reuse of two City-designated Landmark buildings. The design separates the massing and programmatic components (i.e., hotel, residential, and cultural uses) into distinct buildings separated by landscaped pedestrian paseos to allow for varying pedestrian access points throughout the Project site. The configuration of the buildings on the site and their individual structures have been designed to maintain access to natural light and ocean breezes and provide view corridors toward the ocean through the Project site from the Ocean Avenue Paseo and the public courtyard.

Each of the proposed buildings feature a contemporary design with modulated façades to provide visual interest. Building design remains conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to design review by the Landmarks Commission and/or the Architectural Review Board (ARB). The locations, sizes, materials and colors of signage will be reviewed by the Landmarks Commission and/or ARB in accordance with either or both the Santa Monica Sign Code (SMMC Section 9.61) and The Secretary of the Interior’s Standards for the Treatment of Historic Properties, as applicable.

7. ACCESS, PARKING, CIRCULATION

Vehicular access (ingress) to the Project would be provided via First Court Alley, which is currently a 20-foot-wide one-way southbound public alley that connects Arizona Avenue to Santa Monica Boulevard. First Court Alley would be reconfigured to an L-shape, exiting onto Second Street on the northern side of the Second Street Building. One-way traffic would circulate to the site from Arizona Avenue southbound onto First Court Alley and into the entry of the proposed subterranean parking garage (located approximately 190 feet south of Arizona Avenue). Except for emergency vehicles, delivery and other private vehicles would no longer be able to reach Santa Monica Boulevard from First Court Alley as the southern portion of the alley would be vacated at grade and converted into the proposed Santa Monica Boulevard Paseo. Rather, the vehicular alley would connect east to Second Street. Vehicles leaving the Project site would be restricted to right turns only onto Second Street. Similarly, the exit lane from the proposed subterranean garage would connect to the realigned First Court Alley lane connection and exit onto Second Street. Loading and deliveries would occur within commercial loading zones on site along the reconfigured alley across from the proposed Hotel Building and adjacent to the ground floor service area of the Second Street Building. All proposed parking would be provided on-site in a subterranean parking garage. Bicycle facilities would also be provided for residents, employees, and visitors at the ground-level of the Project site.

On Ocean Avenue, the existing curb-cut located near the middle of the Project site would be removed and no parking access would be provided for vehicles from Ocean Avenue. Additionally, on Santa Monica Boulevard, the existing curb-cut/intersection of First Court Alley would be closed with removable bollards and used only for emergency vehicles and utility providers.

Pedestrian access to the Project site would be available from Ocean Avenue, Santa Monica Boulevard, and Second Street. The proposed pedestrian-only paseos (Ocean Avenue Paseo and Santa Monica Boulevard Paseo), as well as the First Court Alley Breezeway, would connect to one another to provide pedestrian access through the Project site. The paseos would provide direct public access to the Hotel Building, Second Street Building, Santa Monica Boulevard Building, and Corner Building. The paseos would also provide car-free public open space with seating, shade, landscaping, and street furniture. The proposed public courtyard would provide access to the Cultural Use Campus and the north side of the Hotel Building. The sidewalk along Second Street would be widened to provide a minimum 15-foot building-to-frontage (face of curb) line. The sidewalks along Ocean Avenue and Santa Monica Boulevard would be 20 feet and 18 feet respectively (curb face to building frontage). These widened sidewalks would allow space for outdoor dining.

8. UTILITIES AND SERVICES

New utility services, electrical, water, and sewer, would include the trenching and installation of associated lateral infrastructure throughout the site, as necessary. Water would be supplied by the City from existing water mains, including one or more of the following: a 12-inch main in Ocean Avenue, a 12-inch main in Second Street, and a 12-inch main in Santa Monica Boulevard. Sewer service would be provided by the City from existing City sewer lines, including 18-inch sewer mains along Ocean Avenue and Second Street. The Project would connect to this system through 8-inch sewer mains on the Project site. Electrical service would be provided by Southern California Edison. Natural gas service would be provided by Southern California Gas Company with meters along First Court Alley.

9. SUSTAINABLE FEATURES

The proposed Project would, at a minimum, comply with the Green Building requirements included in the California Green Building Standards Code and the City's Green Building Standards. Project design would optimize passive design strategies, which use ambient energy sources to supplement electricity and natural gas to increase the energy efficiency. The sustainability design features include the following:

- Energy efficient heating, ventilation, and air conditioning (HVAC) system that meets or exceeds the SMMC requirements
- Photovoltaic solar panels
- Operable windows
- High-performance building envelope usage to maximize insulation
- Occupancy sensors and dimmers to control lighting and HVAC
- Water efficient equipment and plumbing infrastructure
- Interior materials with low volatile organic compound (VOC) content

The Project would also include sustainable transportation infrastructure, such as bicycle parking, employee shower and locker facilities; electric vehicle charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors.

F. CONSTRUCTION ACTIVITIES

Construction of the Project would involve several sequential activities, including site preparation; demolition of existing buildings and parking lots; excavation, including special treatment of the City-designated Landmark buildings; construction, including relocation of the City-designated Landmark buildings; and building finishing, including architectural coatings, landscaping, and rehabilitation of the City-designated Landmark buildings.

Regarding relocation of the City-designated Landmark buildings, several options for methodologies were reviewed by the Applicant team (including a structural engineer, historic preservation architect and general contractor), with the goal of avoiding/minimizing damage or disturbance to the Landmarks. The selected methodology is described here, but others were considered and discarded. For example, the Applicant team contemplated moving the buildings entirely offsite for the duration of construction Project, but this method was determined to be infeasible because (1) there are no viable options for open space available in the immediate vicinity for storage of the structures, and (2) the massing of the buildings is too large to travel over City streets without requiring removal of trees and street lights, or dividing the buildings into smaller sections for travel. The Applicant team also considered lifting the City-designated Landmark buildings from their foundations via crane and suspending them above the Project site during construction of the Project, then lowering the buildings back down after completion of excavation, shoring and construction of the basement space beneath the historic resources; however, the Applicant team determined that the Landmark buildings would be more vulnerable if suspended in air for the duration of construction than if they were placed on platforms and rolled to an interim location within the Project while their permanent foundations were established at new locations. Ultimately, the Applicant team selected the below-described method of relocation onsite, and developed a sequence of events that aims to minimize avoidable risk of damage and vulnerability of the City-Designated Landmark buildings. Work associated with the two historic Landmark buildings would be conducted in manner consistent with the SOI Standards, applicable National Park Preservation Briefs and Tech Notes, and relevant guidelines provided in John Obed's publication entitled *"Moving Historic Buildings"* also published by NPS. All work would be monitored by a qualified historic preservation professional in coordination with the City's Historic Preservation Officer.

1. PHASING

It is anticipated that the construction of the Project would last for a period of up to three years with two months for demolition, four to six months for the relocation of the City-designated Landmarks, three months for excavation, and 25 months for construction from

foundations to occupancy. It is anticipated that existing tenants would vacate buildings and construction work would begin in late 2021 with future occupancy and operation of the proposed Project commencing in late 2024. The precise construction start date and timing of the proposed Project ultimately depends on the timing of entitlements and permit processing.

2. PRE-DEMOLITION

Once the City-designated Landmark buildings located at 1333 and 1337 Ocean Avenue are vacated in preparation for construction of the Project, they each would be secured to protect against vandalism damage, and deterioration. Steel or plywood closures, with one-inch-diameter air holes, would be installed over all doors and windows of the Landmark structures. Sandwich panel installation would be used so as to avoid drilling into window frames and sash, doors, ornament, or masonry units. Maximum legal height chain-link perimeter fencing would be installed around the 1333 Ocean Avenue and 1337 Ocean Avenue properties (or around the entire Project Site or a larger portion of the Project Site) to further secure the buildings.

3. DEMOLITION

The demolition of existing improvements on the current Project site would begin with the removal of the following buildings and paved parking lots:

- Mixed-use commercial, residential building and associated parking lot, 101 Santa Monica Boulevard
- Paved parking lot, 129 Santa Monica Boulevard
- Rear structure, 1327 Ocean Avenue
- Rear structure, 1337 Ocean Avenue

Demolition would require the use of typical construction equipment, such as backhoes, to break up and remove existing asphalt, concrete, and non-historic related building materials on the Project site. Heavy equipment, such as bulldozers and excavators, and heavy trucks would be used to haul away large amounts of debris to a City-approved mixed construction and demolition debris recycling facility. Where needed, any existing hazardous materials used in construction of these buildings would be properly handled and disposed of in accordance with governing authority requirements. The construction haul route would be determined in coordination with City staff, and residential streets would be avoided.

All required construction equipment and materials staging would be accomplished on the Project site, including parking lots and in the vacated area of First Court Alley. Any construction activities in the public rights-of-way (potential intermittent sidewalk closures and/or minor encroachments in the adjacent on-street parking lanes along of Ocean Avenue, Santa Monica Boulevard, and Second Street) would be subject to a Construction Mitigation Plan to be prepared by the Applicant and reviewed and approved by the City.

4. PRE-EXCAVATION OF 1327, 1333, 1337 OCEAN AVENUE

In order to avoid damaging either of the City-designated Landmark buildings on the project site effective planning and protective measures would be initiated by the Applicant prior to any excavation and construction activities. This would include: 1) documenting the existing condition of the buildings; 2) establishing and implementing protective measures during construction; and 3) monitoring the condition of the buildings for the duration of the construction period.

Under the proposed Project the two landmark properties currently situated on the Project site would be relocated on site twice, once to remove them from their foundations and again to place them back on new foundations in new locations on the site. The two buildings would be relocated on site over a period of approximately 4 to 6 months. The buildings would be moved to temporary locations at the southern end of the Project site on the 101 Santa Monica Boulevard parcel while their permanent locations are prepared for receivership. Prior to excavation on the 1327, 1333, or 1337 Ocean Avenue sites or disturbance of the 1333 or 1337 Ocean Avenue Landmark properties, including separation from their current foundations, a historic preservation architect with a minimum of five (5) years of relative experience in the rehabilitation and restoration of historic buildings would thoroughly document the existing conditions of the City-designated Landmarks through field photographs and written descriptions, including documentation of character-defining features. Excavation and/or soil disturbance would not proceed until the adequacy of the required documentation has been reviewed and approved by the City Landmarks Commission staff liaison in the Planning Division of the City's Planning & Community Development Department.

In addition, prior to any excavation conducted on the 1327, 1333, or 1337 Ocean Avenue sites or disturbance of 1333 and 1337 Ocean Avenue properties, including separation from their current foundations, the historic preservation architect would establish and provide a construction employee training program that emphasizes protection of historic resources for all construction workers involved in their relocation, protection, or rehabilitation. This program would include information on recognizing historic fabric and materials, and directions on how to exercise care when working around and operating equipment near the City-designated

Landmark buildings. Such training would include information on effective means to reduce dust and vibration as well as applicable monitoring and reporting requirements.

5. RELOCATION OF CITY-DESIGNATED LANDMARK BUILDINGS

After removal and clearing of the non-historic buildings and structures within the Project site as well as the paved parking lots, the two City-designated Landmark buildings currently at 1333 and 1337 Ocean Avenue would be temporarily relocated to the south end of the Project site along Santa Monica Boulevard. Once the two historic buildings are moved to their temporary locations, the permanent foundations for the buildings would be prepared on the northern portion of the Project site. After the permanent foundations are set the two historic buildings would be relocated to their permanent locations in support of the Cultural Use Campus that is being created as part of the proposed Project. After the City Landmark buildings are attached to their permanent foundations, excavation would occur under and around them.

The Applicant team has developed the following sequence for relocating the on-site City Landmark buildings as follows (subject in all cases to necessary adjustments during relocation):

Shoring/stabilizing structures:

1. Place I-beam shoring in the crawl space beneath bearing walls and posts to provide gravity and lateral support in the existing historic structures;
2. Remove or otherwise protect all fragile/at-risk items in the historic buildings; and
3. Construct bracing and temporary restraints in and around historic structure.

Temporary relocation of the Landmark structures:

1. Lift the I-beam shoring sub-structure sufficiently to safely transfer building loads to the shoring and disconnect the buildings from their current foundations; and
2. Roll the shoring platforms with the buildings to the south to align with their temporary location in the 101 Santa Monica Boulevard parking lot.

The Project team's structural engineer and a qualified construction contractor (with experience in moving historic buildings) as well as the historic preservation architect would confirm the precise forms of shoring/stabilization necessary prior to the relocation of the two City-designated Landmarks. The relocations efforts utilized by the Project construction contractors would be based on the recommendations and guidance provided in the NPS

publication *Moving Historic Buildings* by John Obed Curtis. The monitoring historic preservation architect would document the precise forms of shoring/stabilization in a written narrative that would be provided to the City Landmarks Commission staff liaison in the Planning Division of the City's Planning & Community Development Department.

Technical work scopes proposed for the preparation of the site and relocation of the City-designated Landmark buildings would include the following:

Future Site Preparation:

1. Bore four to eight caisson piles, as necessary, beneath the areas where each of the City-designated Landmarks would be placed, lower reinforcement cages into the caisson borings, and place concrete in the caissons;
2. Bore a shoring system of soldier piles around the parcel perimeter for the subterranean parking garage excavation;
3. Install soldier piles and slurry; and
4. Trench for grade beams between the caissons to provide final support for the City-designated Landmarks, place reinforcement cages in the grade beam excavations, place concrete in the grade beam framework, and erect formwork, install reinforcing and place concrete for the foundations.

Permanent Relocation of Landmark Buildings:

1. Roll the shoring platforms with each building north into their final positions;
2. Construct the crawl space support walls;
3. Lower each building onto the crawl space support walls;
4. Attach each building to the ground-level concrete slab through the crawl space support walls; and
5. Remove the steel I-beam shoring from the crawl spaces.

As mentioned, the relocation process for the two Landmark buildings would occur over the course of approximately 4 to 6 months.

6. EXCAVATION

Excavation and shoring activities within the Project site would occur over a period of three (3) months. The Project would involve excavation of soils to a depth of approximately 35 to 40 feet below existing grade, including beneath the relocated City-designated Landmark buildings. Excavation on the 129 Santa Monica Boulevard property (the paved parking lot) may occur while the permanent foundations for the two historic buildings are being prepared. Soldier type piles for shoring would be installed using drill and pour methods. Excavation and soil export would comply with all applicable South Coast Air Quality Management District (SCAQMD) rules.

Excavation for the subterranean parking garage below and adjacent to the two relocated historic buildings would include the following activities to protect the City-designated Landmarks:

- Construct of slabs and columns adjacent to the historic buildings to provide lateral support for the caissons;
- Excavate the Project site for the subterranean parking garage, including excavation around caissons below the City-designated Landmarks;
- Install lagging around the excavation perimeter as excavation advances;
- Excavate to Level B1 and brace the caissons with beams (this level would be open as part of basement gallery for the Cultural Use Campus);
- Excavate to Level B2 and brace the caissons with beams;
- Excavate to Level B3 and integrate caissons with the subterranean parking garage foundation system; and
- Place ground-level foundations and slab.

7. CONSTRUCTION

Construction associated with the proposed Project would begin with excavation of a three-level subterranean parking structure and construction of a ground floor podium structure supporting multiple buildings. Overall building construction is estimated to require a total of approximately 25 months, just over two years.

All required equipment and material staging would be provided onsite and within the traffic controlled or delineated areas and all work would be subject to a Construction Mitigation Plan to be prepared by the Applicant and reviewed and approved by the City. No pile driving would be used for construction of the proposed Project.

Construction Monitoring of City-designated Landmark Buildings

The Project team's structural engineer and monitoring historical preservation architect would provide on-site oversight of the City-designated Landmark buildings during construction-related activities and would report any material changes to pre-construction conditions. Monitoring reports would be submitted to the City Landmarks Commission staff liaison in the Planning Division of the City's Planning & Community Development Department on a periodic basis (submission schedule of monitoring reports would be established in consultation with the Landmarks Commission staff liaison). The structural engineer would consult regularly with the historic preservation architect throughout construction, particularly if any issues regarding damage to (potential or otherwise) or any unforeseen changes to the two on-site historic buildings are discovered, including those that may affect their identified character-defining features.

If, in the opinion of the structural engineer in consultation with the historic preservation architect, substantial adverse impacts to the on-site historic resources are encountered during construction, the Applicant would inform the City Landmarks Commission staff liaison immediately. The Applicant and/or construction contractor would adhere to City staff's recommendations for corrective measures, including halting construction in situations where construction activities would imminently endanger the historic resources. The Applicant and/or construction contractor would respond to any claims of damage by promptly inspecting the affected historic resource(s). Site visit reports and documents associated with claims processing would be provided to the City's Landmarks Commission staff liaison. Any suspected damage to either designated historic resource would be compared to pre-construction conditions and a determination would be made by City staff as to whether the proposed Project caused such damage. If the proposed Project is demonstrated to have caused any damage, such damage would be repaired to pre-construction conditions by the Applicant and/or construction contractor in compliance with the SOI Standards.

Rehabilitation of City-designated Landmark Buildings

During construction, the rehabilitation of the two City-designated Landmark buildings consistent with the approved Certificate of Appropriateness (or equivalent approval) would be undertaken with the assistance of a qualified historic preservation architect meeting The

Secretary of the Interior's Historic Preservation Professional Qualifications Standards, which are part of the larger "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation." The historic preservation architect would regularly review the ongoing rehabilitation plans, work efforts, other related on-site construction activities to ensure that they continue to satisfy conditions of the associated approved Certificate of Appropriateness (or equivalent approval) issued by the City Landmarks Commission. Monitoring reports would be submitted to the City's Landmarks Commission staff liaison on a periodic basis (submission schedule of monitoring reports would be established in consultation with the Landmarks Commission staff liaison).

G. ANALYSIS OF PROJECT IMPACTS

Analysis of potential impacts to properties that qualify as historical resources, pursuant to the CEQA Guidelines, Section 15064.5, requires that a lead agency first determine whether a building, structure, object, or feature is a historical resource. If the lead agency determines a property is a historical resource, its significance may be materially impaired for the reasons previously discussed in this chapter. Typically, the significance of a historic resource is impaired through demolition, relocation or alteration. During construction of the Project ground-borne vibration effects have the potential to cause indirect structural damage to historical resources on the Project site and in the nearby vicinity. In addition, a resource may also be indirectly materially impaired by incompatible adjacent new construction that alters the setting of the resource, thereby diminishing its integrity and historical significance.

A set of conceptual plans with illustrations has been created to represent a potential development scenario that depicts the basic intent of the proposed Project. While the precise details of design have not been definitively determined, the conceptual plans/illustrations represent the most current development scenario under evaluation and consideration. The proposed project has three kinds of potential direct impacts to identified historic resources located within the Project site:

- Non-construction related impacts due to relocation and the proposed new construction;
- Impacts related to the rehabilitation of the two Landmark buildings within the Project site;
- Construction related impacts.

The proposed project also has potential indirect impacts to identified historic resources located adjacent to the Project site.

The survey study area identified four (4) properties that are considered historical resources under CEQA. Two historic resources are located within the Project site with two situated adjacent to the Project area. For project review consideration the following table provides a listing of those properties identified as historic resources pursuant to CEQA.

HISTORIC RESOURCES WITHIN SURVEY STUDY AREA

Description	Address/Location	Built Date	Status Code
Properties within Project Site			
Commercial Building (Victorian House)	1333 Ocean Avenue	1906/1941	5S1
Commercial Building (Spanish Colonial Revival Building)	1337 Ocean Avenue	1926/1951	5S1
Properties Adjacent to Project Site			
Commercial Building (Gussie Moran House)	1323 Ocean Avenue	c.1887-1891	3S, 3CS, 5S1
Public Park (Palisades Park)	100-1500 blocks Ocean Ave (west side)	1892	5S1
<p><u>KEY-CALIFORNIA HISTORICAL RESOURCE STATUS CODES:</u></p> <p>3S: Appears eligible for National Register as an individual property through survey evaluation.</p> <p>3CS: Appears eligible for California Register as an individual property through survey evaluation.</p> <p>5S1: Individual property that is listed or designated locally.</p>			

1. HISTORIC RESOURCES WITHIN PROJECT SITE

Commercial Building, Victorian House, 1333 Ocean Avenue

The Victorian House located at 1333 Ocean Avenue is a Queen Anne style designated City of Santa Monica Landmark and is; therefore, defined as a historic resource under CEQA. The structure at the rear of the lot is not considered a historic resource pursuant to the CEQA Guidelines. Under the proposed Project the Landmark building would be relocated on the north portion of the proposed project site along Ocean Avenue, rehabilitated, and restored. The building would then be adaptively used for historical and cultural purposes and become part of the new Cultural Use Campus created as part of the Project.

Relocation

The proposed Project would not demolish or destroy the 1333 Ocean Avenue Landmark building. The concept-level proposed Project would relocate the Victorian House on-site at a temporary location along Santa Monica Boulevard. It would ultimately be relocated to the northern portion of the project site on the parcel once occupied by the Spanish Colonial Revival Landmark commercial building (it too would be relocated in a similar manner). In other words, the two landmark structures would swap parcel placement locations upon relocation.

Relocation of the Victorian House Landmark at 1333 Ocean Avenue has the potential to result in a significant effect under CEQA because “relocation” of the building away from its historic site and “alteration of the resource or its immediate surroundings” could all result in a “substantial adverse change in the significance” of the historic resource. Relocation of the landmark building could also damage important character-defining features, which in turn could materially alter the physical characteristics of the resource that conveys its historical significance.

As conceptually proposed and addressed in the Conformance Recommendation Memorandum prepared by Chattel, Inc., it appears that the relocation effort would not result in a substantial loss of integrity of location as it would ultimately be relocated on the adjacent parcel to the south of its current location. Following relocation the building would retain its compass orientation facing west onto Ocean Avenue, its current setback from the street, and its proximate relationship to grade through retention of a raised foundation. Historically, the building has long fronted Ocean Avenue facing Palisades Park, and the slight shift in location would not substantially alter the historic setting or context of the building because it would continue to convey the same general history and streetscape of residential development along Ocean Avenue as it did prior to the relocation.

It also appears that the proposed relocation would not result in an important loss of integrity of design, materials or workmanship of the building as its important character-defining would be preserved; repaired, as necessary; and restored in some instances. The physical removal from and demolition of the foundation as well as the removal of some exterior non-historic material from the building before relocation and its subsequent alteration for adaptive use, rehabilitation, and restoration would not be considered a substantial loss of historical integrity of design, materials, and workmanship because these elements are not character-defining and such work would be conducted in manner consistent with the SOI Standards. Important site characteristics of the property to be maintained after relocation would be compass orientation, compatibility of scale, use, and compatible landscape design and elements.

As the new permanent location of the Landmark building upon relocation appears conceptually compatible with the original character use of the historic structure and the resource would retain its listing as a City of Santa Monica Landmark, relocation would not be considered significant. Based on a review of the proposed Project Components, as discussed earlier in this Chapter; the Conformance Recommendations Memorandum prepared by Chattel, Inc.; and review of conceptual Project plans, drawings, and illustrations, as part of this environmental review, the relocation of the 1333 Ocean Avenue Landmark building appears preliminarily compliant with the SOI Standards. Nonetheless, to ensure full compliance with the SOI Standards upon preparation and compliance review of final project plans, mitigation measures are required to reduce any potential impacts to a less than significant level.

Rehabilitation

The proposed rehabilitation of the Victorian House Landmark property would preserve, repair, and restore important exterior character-defining features as well as remove incompatible, non-character-defining elements and additions. The interior space of the building would be modified for adaptive use; and such spaces are not considered character-defining. As conceptually proposed and described in the Conformance Recommendations Memorandum prepared by Chattel, Inc., the front (west, primary) façade would be restored based on physical evidence and historical documentation. The original tower, which has been shortened and modified over the years, and its original widow walk would be restored to its full height and would be clad in wood siding as it was historically. The now enclosed front porch with its column capitals on the first floor adjacent the front door would also be restored and opened. The integral porch on the second floor of the front elevation, which has also been altered, would be restored to its full length, extending it in front of the window to the north. The front gable ornamentation previously removed would also be restored in-kind. In addition, the brick chimney would be accurately restored above the roof plane only (to the extent possible by code) and the roof would be recovered with new flame-retardant wood shingle roofing material as originally sheathed.

The exterior side wall of the north (side) elevation has had little alterations. Under the proposed, Project this elevation would be modified to be incorporated into the new Cultural Use Campus. Centered on the first floor of this side elevation a rectangular-shaped opening would be made which would allow pedestrian passage from the interior of the building to an open entry foyer and lobby space. This opening would be roughly as wide as the eaves of the second floor dormer set just above and would remove four existing windows and an existing door at the first floor. The second floor dormer would be retained and repaired as necessary and all remaining exterior wall finishes would also be retained and rehabilitated.

The east (rear) elevation has been previously altered through the addition of an entry door and bridge at the second floor that connects to a detached non-historic ancillary structure. Under the proposed Project, the door and bridge would be removed and this elevation would be modified to allow construction of a new contemporary two-story addition as part of the Cultural Use Campus improvements. A rectangular shape opening would be cut at the proximate location of the first floor fenestration and would open into a hallway connecting to other portions of the new Cultural Use Campus construction.

The south (side) elevation has been substantially modified over the years through the modification and addition of second floor dormers, non-original porch supports and curved brick stairs, and other features and materials. Currently, the building has three gable dormers at the second floor; however, upon review of historical photographs the building only had one dormer along this elevation (similar to the north roof plane). The one original gable, roughly centered on this elevation, would be restored as part of the proposed Project. In addition, non-original features and materials would be removed and this elevation restored based upon photographic and physical evidence. Most of this elevation would be visible from within the constructed project site though a portion of the eastern end would be incorporated inside the new Cultural Use Campus building.

In concept, it appears that the historic character and context of the Victorian House Landmark property would be retained and the proposed work would be conducted in accordance with the SOI Standards. Therefore, at the concept design level the proposed Project should not demolish or materially alter in an adverse manner any character-defining features that convey the historical significance of the building or its formal recognition as a City-designated Landmark. However, as the plans reviewed for this EIR are considered conceptual and such plans are subject to further refinement, it is possible that final project design could include elements that would result in a potentially significant impact to the historic resource. Therefore, mitigation measures are required to implement this aspect of the proposed Project to ensure that potential impacts to the resource are reduced to less than significant.

Compatibility of New Construction

The proposed Project would construct five new buildings on-site for use as a multi-story hotel, apartment buildings, retail, and cultural campus. Landscaped pedestrian-only paseos, breezeway, private deck space, open courtyards, and a rooftop observation deck atop the hotel would provide substantial open space and separation between the historic buildings and new development proposed throughout the Project site. The concept level design proposed as the Project also includes a three-level subterranean parking garage, a portion of which would be built under the site of the relocated Landmark building. A design goal of the built

improvements, open space, and Project site is to complement the existing urban patterns found in the downtown area of Santa Monica through siting and orientation; building mass modulation; location of uses and programs; and relocation, rehabilitation, and adaptive use of the two on-site City-designated Landmark buildings.

While contemporary in architectural styling, the overall design philosophy for the new buildings reflect the signature features that are associated with master architect Frank Gehry and his iconic Deconstructivist style. Nonetheless, at this time the overall design of project components remain conceptual and specific color palettes, siding material, window type and material, signage, and overall materials and finishes are still being refined and would be subject to further review for SOI Standards compliance by the staff liaison for the City's Landmarks Commission as well as the City's Landmarks Commission and/or Architectural Review Board, as required.

In assessing new construction compatibility with the historic Landmark building, the baseline for appropriately designing new construction in the vicinity of historic resources is articulated in SOI Standard 9:

"New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment."

Based on the concept level design of the proposed Project, it appears to comply with this baseline. As described in the proposed Project Description the intention of the design is to create a contemporary, bold statement that yet allows both historic buildings at the north end of the site to retain their streetscape context and residential setting.

The new Cultural Use Campus building would be built at the rear (east) of the 1333 Ocean Avenue Landmark building (and the adjacent 1337 Ocean Avenue Landmark building). While this new building would be visible from the public right-of-way, it would read as a separate structure and its two-story height, volume and mass would not dominate or compete over the size and scale and historic qualities of the historic resource. Its design is simple as to create a backdrop for the two historic buildings and allowing them to dominate the streetscape along Ocean Avenue. The physical separation between the new improvements and historic buildings on the site is generously provided through the use of open pedestrian-only paseos and breezeways as well as concerted building placement on site. This sensitivity allows the

historic buildings to stand out and remain the focal points of entry to the proposed Cultural Use Campus. The new buildings would clearly be contemporary and differentiated, yet the historic building(s) would remain a dominant visual element of the site and overall streetscape. Nonetheless, as the project plans reviewed for this environmental assessment are considered conceptual and such plans have not yet been finalized, it is possible that final project design could include elements that would result in a potentially significant impact to the historic resource. Therefore, mitigation measures are required to implement this aspect of the proposed Project to ensure that potential impacts to the resource are reduced to less than significant.

Construction Activities

The proposed Project also includes extensive demolition, grading, excavation, boring, drilling, and on-site construction-related activities. The placement of these activities below or adjacent to the Landmark building has the potential to result in inadvertent, indirect damage to the resource. The Victorian House Landmark property may be susceptible to significant ground-borne vibration and other impacts generated by construction-related activities of the proposed Project. Based on the conceptual level design of the proposed Project Components, mitigation measures addressing potential ground-borne vibration impacts on-site are required to ensure that potential impacts to the resource are reduced to less than significant.

In addition, implementation of MM NOI-2, as further analyzed in Section 4.1, Noise, of the EIR, would further reduce ground-borne vibration structural damage impacts to this on-site City-designated Landmark to a less than significant level.

Demolition

Under the proposed Project the secondary building at the rear (east) of the parcel would be demolished in order to construct the new Cultural Use Campus building. This ancillary structure is not a historical resource for the purposes of CEQA. Thus, the demolition of this structure would not result in a substantial adverse change in the significance of the designated Landmark building at the front of the parcel and mitigation measures are not required.

Commercial Building, Spanish Colonial Revival Building, 1337 Ocean Avenue

The Spanish Colonial Revival style commercial building located at 1337 Ocean Avenue is designated as a City of Santa Monica Landmark and as such is considered a historic resource pursuant to CEQA. The structure at the rear of the lot is not considered a historic resource pursuant to the CEQA Guidelines. Under the proposed Project the 1337 Ocean Avenue Landmark building would be relocated on the north portion of the proposed project site along

Ocean Avenue, rehabilitated, and restored. The building would then be adaptively used for historical and cultural purposes and become part of the new Cultural Use Campus created as part of the Project.

Relocation

The proposed Project would not demolish or destroy the 1337 Ocean Avenue Landmark building. The concept level design of the proposed Project would initially relocate the Spanish Colonial Revival style Landmark building on-site at a temporary location along Santa Monica Boulevard. It would ultimately be relocated to the northern portion of the project site on the parcel once occupied by the Victorian House Landmark building (it too would be relocated in a similar manner). In other words, the two landmark structures would trade placement locations upon relocation.

Upon relocation, the Landmark building would retain its compass orientation fronting Ocean Avenue, its minimal setback from the street, and its proximate relationship to grade. As the proposed work associated with the relocation of the Spanish Colonial Revival Landmark building would be similar to that discussed above for the Queen Anne Landmark building, the historic resource would retain its listing as a City of Santa Monica Landmark. Based on a review of the proposed Project Components, as discussed earlier in this Chapter; the Conformance Recommendations Memorandum prepared by Chattel, Inc.; and review of conceptual Project plans, drawings, and illustrations, as part of this environmental review, the relocation of the 1337 Ocean Avenue Landmark building appears preliminarily compliant with the SOI Standards. Nonetheless, to moderate any potentially significant impacts from occurring prior to, during, and after Project implementation and to ensure full compliance with the SOI Standards upon preparation and compliance review of final project plans mitigation measures are required to reduce any potential impacts to a less than significant level.

Rehabilitation

The proposed rehabilitation of the Spanish Colonial Revival Landmark building would preserve, repair, and restore important exterior character-defining features as well as remove incompatible, non-character-defining elements and additions. The interior space of the building would be modified for adaptive use; and such spaces are not considered character-defining. As conceptually proposed and described in the Conformance Recommendations Memorandum prepared by Chattel, Inc., the terra cotta pavers currently in front of the centered entrance door of the building would be salvaged and reinstalled or replaced in-kind following relocation.

The front (west, primary) façade would be restored based on physical evidence and historical documentation. The front main entrance originally featured a cast stone Churrigueresque inspired decorative surround with flanking spiral engaged columns, which was removed years ago. Under the proposed rehabilitation work this ornate entrance element would be reconstructed and restored on the building's facade based on historical photographs and physical evidence. The decorative sconces that were once over each of the main front window openings at ground-level would also be reconstructed based on the protocols of the SOI Standards. Those Spanish Colonial Revival design features that were once on the building's front façade, including any door and window features and stylistic decorative elements as well as the original upper level decks with open railings and cast stone balusters would also be reconstructed. The goal for the rehabilitation work proposed for the west front elevation would be to architecturally restore its front façade from its period of significance (1926).

The north (side) elevation retains many of its original features, materials, and solid to void relationship and; therefore, has been minimally altered over the years. Much of this side elevation is considered secondary as its new location at the northern portion of the site and adjacency to the historic Gussie Moran House to the north has limited view from the public right-of-way. The conceptual level Project plans propose to retain and repair the original doors and windows along this side wall, though some windows would become "blind" windows to accommodate the function of the interior gallery planned for the space (the windows become non-operational and enclosed from the interior). It is anticipated that this work would be conducted in a manner that would be considered reversible pursuant to the SOI Standards.

The east (rear) elevation has been modified by the construction of an addition along the first floor and a wood porch deck above at the second story. Under the proposed conceptual level design plans a narrow two-story addition would be built onto this back wall. The addition would connect the rear of the Landmark building to the new Cultural Use Campus building set behind the two landmarks by extending the interior gallery space. In order to help differentiate the old from the new the addition would be slightly inset from the north and south elevations of the Landmark building.

The south (side) elevation of the building has also been modified over the years, but retains substantial historic fabric. Some original window frames and doors along this wall plane have been removed, replaced, or altered. Limited alterations to this elevation are proposed for adaptive use of the structure. Along the first floor level windows and a door that have been inappropriately replaced or removed would be restored to match this original. The door would retain its visual appearance as such, but be non-operable and fixed shut (it would become a blind door). At the second floor level the existing fenestration pattern would remain and those windows that have been replaced would receive in-kind replacements to match the original

based on photographic and physical evidence. Similar to the fenestration work proposed for the second floor of the north elevation some windows would become “blind” windows to accommodate the function of the interior gallery planned for the space. It is anticipated that this work would be conducted in a manner that would be considered reversible pursuant to the SOI Standards. The clay tiled covered shed roof on this east elevation would also be retained, though the non-original windows on this cantilevered portion of the building would be removed and infilled. The terra cotta roof tiles would be removed, salvaged, and reinstalled, as part of the proposed work scopes. Any deteriorated or broken roof tiles would be replaced in-kind to match the historic feature.

In concept, it appears that the historic character and context of the Spanish Colonial Revival style Landmark building would be retained and the proposed work would be conducted in accordance with the SOI Standards. Therefore, at the concept design level the proposed Project should not demolish or materially alter in an adverse manner any character-defining features that convey the historical significance of the building or its formal recognition as a City-designated Landmark. However, as the plans reviewed for this environmental assessment are considered conceptual and such plans have not yet been finalized, it is possible that final project design could include elements that would result in a potentially significant impact to the historic resource. Therefore, mitigation measures are required to implement this aspect of the proposed Project to ensure that potential impacts to the resource are reduced to less than significant.

Compatibility of New Construction

As stated previously, the proposed Project would construct five new buildings on-site for use as a multi-story hotel, apartment buildings, retail, and cultural campus. Landscaped pedestrian-only paseos, breezeway, private deck space, open courtyards, and a rooftop observation deck atop the hotel would provide substantial open space and separation between the historic buildings and new development proposed throughout the Project site. The proposed Project also includes a three-level subterranean parking garage, a portion of which would be built under the site of the relocated Landmark building. A design goal of the built improvements, open space, and Project site is to complement the existing urban patterns found in the downtown area of Santa Monica through siting and orientation; building mass modulation; location of uses and programs; and historic preservation of the two on-site City-designated Landmark buildings.

As assessed and discussed above for the 1333 Ocean Avenue Landmark building, the proposed Project has been designed to respect the historic character and qualities of the adjacent 1337 Ocean Avenue Landmark property. The new construction, exterior alterations,

and new additions conceptually proposed would not destroy the Spanish Colonial Revival style Landmark building or its historic character-defining features. The physical separation between the new improvements and historic buildings on the Project site is generously provided through the use of open pedestrian-only paseos and breezeways as well as concerted building placement on site. As mentioned, this sensitivity allows both historic buildings to stand out and remain the focal points of entry to the proposed Cultural Use Campus. The new buildings would clearly be new and differentiated, yet the Spanish Colonial Revival style Landmark building would remain a dominant visual element of the site and overall streetscape. With the conceptual design and placement of the new construction proposed the overall historic character and integrity of the historic building are retained and protected. Nonetheless, as the project plans reviewed for this EIR are considered conceptual and such plans are subject to refinement by the City's Planning Commission, ARB, and/or Landmarks Commission, it is possible that final project design could include elements that would result in a potentially significant impact to the historic resource. Therefore, mitigation measures are required to implement this aspect of the proposed Project to ensure that potential impacts to the resource are reduced to less than significant.

Construction Activities

As discussed above for the 1333 Ocean Avenue Landmark property, the proposed Project also includes extensive demolition, grading, excavation, boring, drilling, and on-site construction-related activities. The placement of these activities below or adjacent to the 1337 Ocean Avenue Landmark building has the potential to result in inadvertent, indirect damage to the resource. The Spanish Colonial Revival commercial building may be susceptible to significant ground-borne vibration and other impacts generated by construction-related activities of the proposed Project. Based on the conceptual level design of the proposed Project mitigation measures addressing potential on-site ground-borne vibration impacts to this historic resource are required to reduce such potential adverse change to a less than significant impact.

In addition, implementation of MM NOI-2, as further analyzed in Section 4.1, Noise, of the EIR, would further reduce ground-borne vibration structural damage impacts to this on-site City-designated Landmark to a less than significant level.

Demolition

Under the proposed Project the secondary building at the rear (east) of the parcel would be demolished in order to construct the new cultural use building. This ancillary structure is not a historical resource for the purposes of CEQA. Thus, the demolition of this structure would not

result in a substantial adverse change in the significance of designated Landmark property and mitigation measures are not required.

2. HISTORIC RESOURCES ADJACENT PROJECT SITE

Commercial Building, Gussie Moran House, 1323 Ocean Avenue

The Gussie Moran House located at 1323 Ocean Avenue is designated a City of Santa Monica Landmark and is; therefore, considered a historic resource under CEQA. The Landmark property is located along Ocean Avenue and is situated one parcel north of the Project site. The two identified historic resources within the Project site are currently located near the Gussie Moran house to the south and upon their relocation as part of the conceptual project plans reviewed would retain their general placement at the north end of the Project site immediately adjacent to the Gussie Moran House Landmark property. Therefore, the existing setting, scale and massing, visual continuity of the streetscape and spatial relationship between the three designated Landmarks would remain basically unimpaired.

Although the proposed Project would not cause indirect impacts to the Gussie Moran House Landmark property due to its design and rehabilitation, construction of the Project has the potential to cause structural damage to the historic resource's character-defining features due to ground-borne vibration. Damage to some of the property's notable features, such as its tall, shingled conical tower; bands of plain and fish scale shingles and stringcourse at the gable face; turned stickwork kingpost and collar beam at the gable apex; shiplap siding; porch posts; brick chimney; and fenestration may occur due to construction-related vibration effects. Some common sources of construction-related ground-borne vibration include pile-driving, blasting, and the operation of heavy earth-moving equipment such as vibratory rollers for compacting soil, large bulldozers, etc. Based on the conceptual level design of the proposed Project mitigation measures addressing potential on-site ground-borne vibration impacts to this historic resource are required to reduce such potential adverse change to a less than significant impact.

Implementation of the proposed mitigations measures included in this assessment and the noise mitigation measure MM NOI-2, as further analyzed in Section 3.11, Noise, of the EIR, however, would require the voluntary acceptance by the off-site property owner(s).⁵¹ Although

⁵¹ As indicated in Section 3.11, Noise, of this EIR, construction on the Project site would result in potentially significant construction vibration impacts to one adjacent structure, the Gussie Moran House at 1323 Ocean Avenue, which is a City-designated Landmark. This report addresses impacts to historic resources. Please see Section 3.11 of this EIR for further discussion regarding construction vibration effects.

voluntary acceptance by the off-site property owner(s) would reduce this impact to a less than significant level, the City does not have the jurisdiction or control to mandate implementation of these mitigation measures. Because the consent of the off-site property owner(s) cannot be guaranteed, it is conservatively concluded that unless mitigated, the Gussie Moran House Landmark property could have potentially significant and unavoidable vibration impacts. (See Section 3.11, Noise, of this EIR for further discussion regarding construction vibration impacts)

Public Park, Palisades Park, 100-1500 blocks Ocean Avenue (west side)

The public park referred to as Palisades Park, is a designated City Landmark and as such is defined a historic resource under CEQA. The park is located directly across Ocean Avenue, west of the Project site it is not part of the proposed Project. Due to the park's offset distance and its wide separation by Ocean Avenue from the Project site and because the Project's massing and scale would be compatible with the other existing development in the surrounding setting the proposed Project would result in no adverse material change to the overall historic character or significance of this designated City Landmark. In addition, because of the wide separation between the Project site and the historic park locale to the west, and because of its linear property type as a resource the potential impact caused by construction-related ground-borne vibration is considered minimal. After project completion, Palisades Park would still retain integrity from its period of significance (1892-present time), convey its historical significance, and would continue to be a distinctive visual feature of the City. As the park's historic integrity and designation as a City Landmark would not be substantially impaired due to construction of the proposed Project mitigation measures for this historic resource are not required to implement the proposed Project.

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FIGURE 5-1

EXISTING CONDITIONS

OCEAN AVENUE PROJECT
Santa Monica, California



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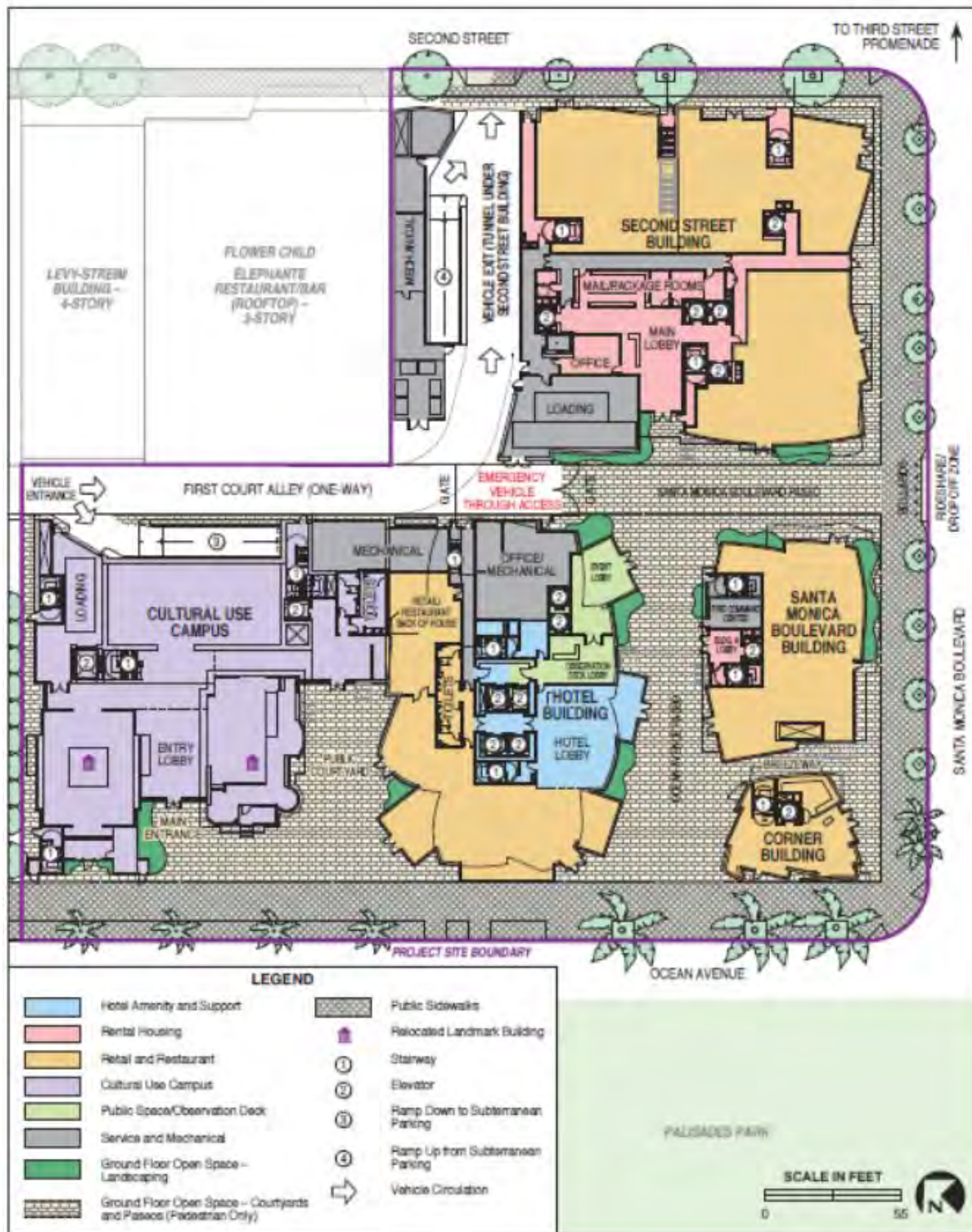
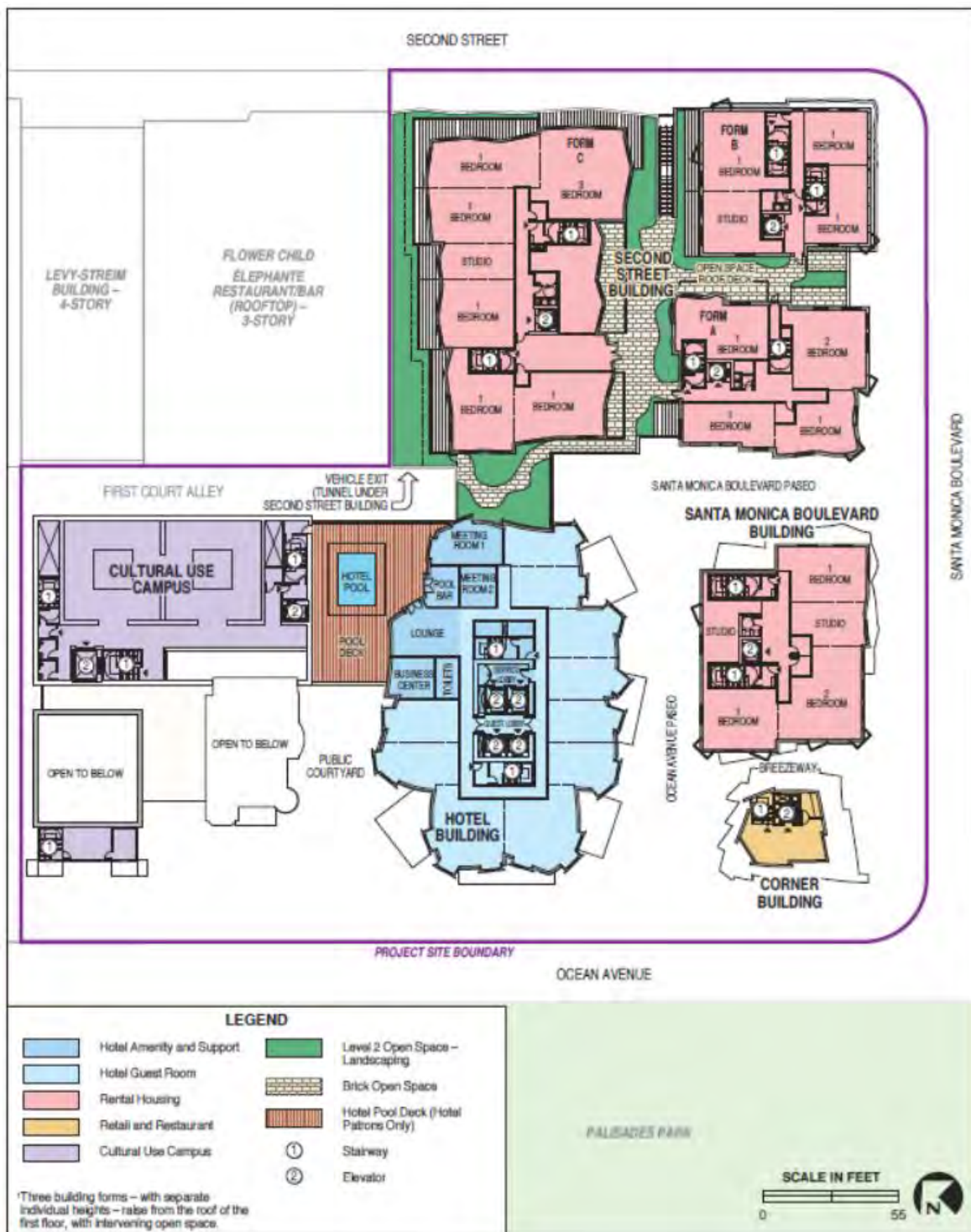


FIGURE 5-2

GROUND LEVEL PLOT PLAN

OCEAN AVENUE PROJECT
Santa Monica, California

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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-3

LEVEL 2 FLOOR PLAN
OCEAN AVENUE PROJECT
Santa Monica, California

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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-4

LEVEL 3 FLOOR PLAN
OCEAN AVENUE PROJECT
Santa Monica, California



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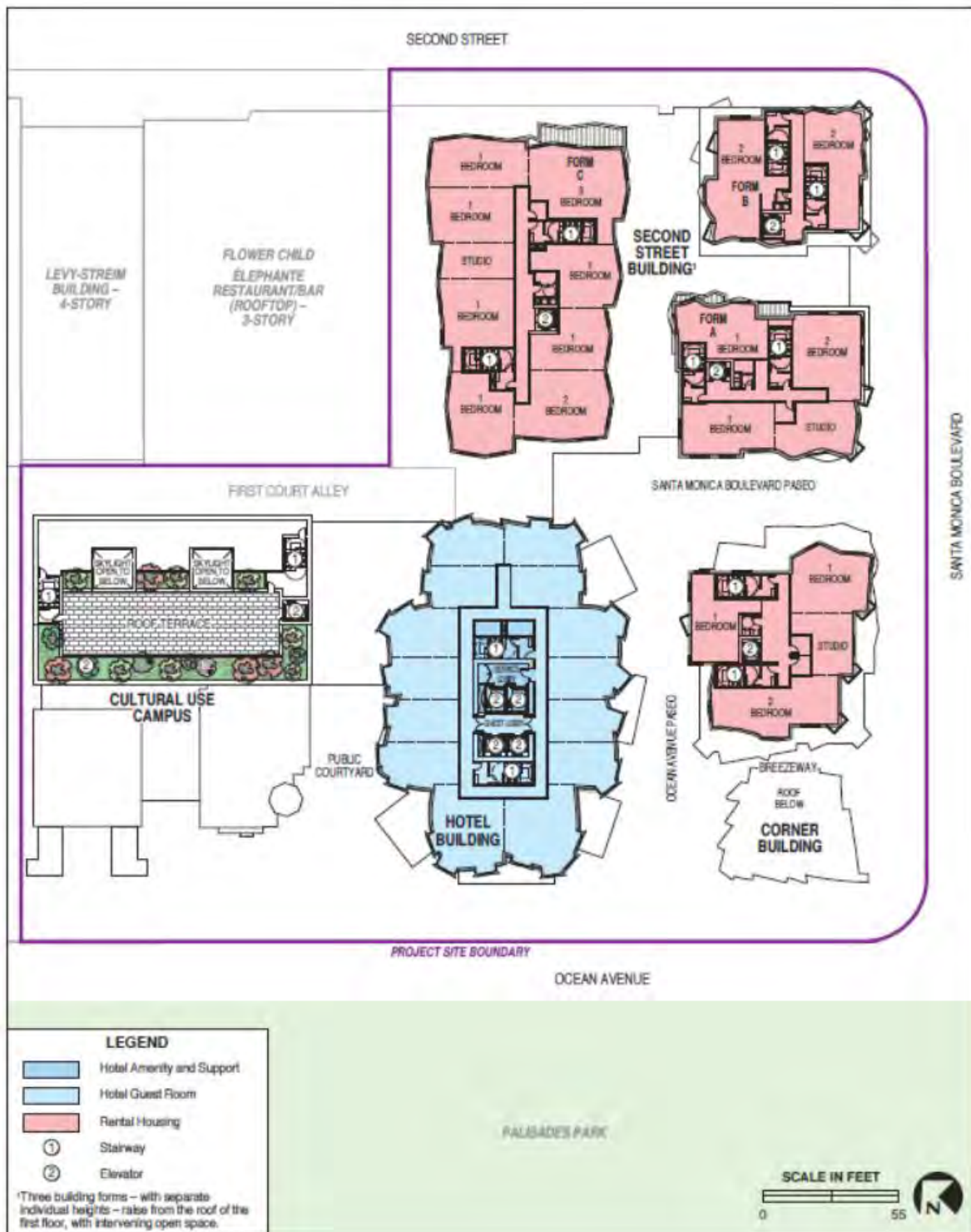


FIGURE 5-5

LEVEL 4 FLOOR PLAN
OCEAN AVENUE PROJECT
 Santa Monica, California

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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-6

LEVEL 5 FLOOR PLAN

OCEAN AVENUE PROJECT

Santa Monica, California

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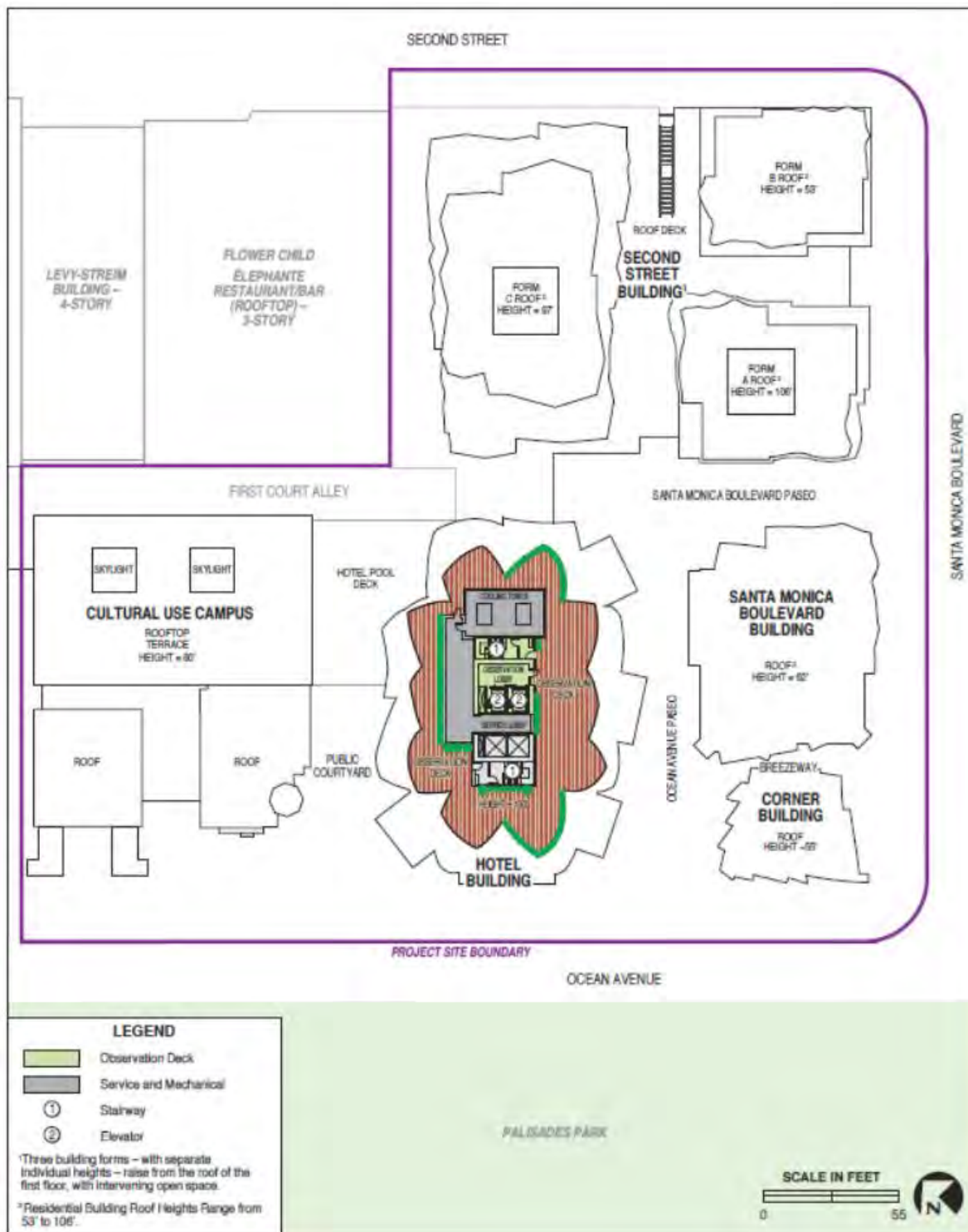
(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-7

LEVEL 9 FLOOR PLAN
OCEAN AVENUE PROJECT
Santa Monica, California



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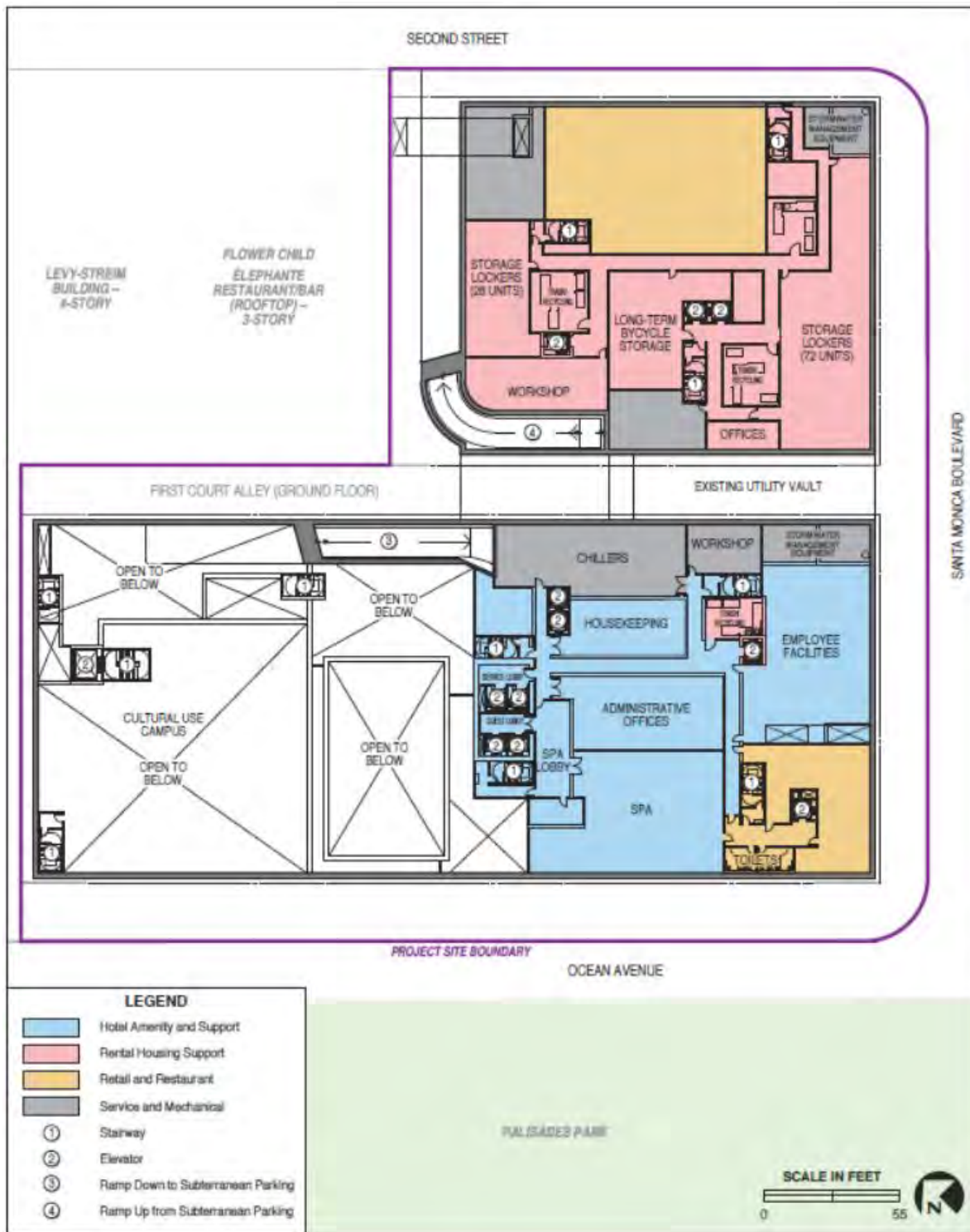
(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-8

ROOFTOP FLOOR PLAN

OCEAN AVENUE PROJECT
Santa Monica, California

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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-9

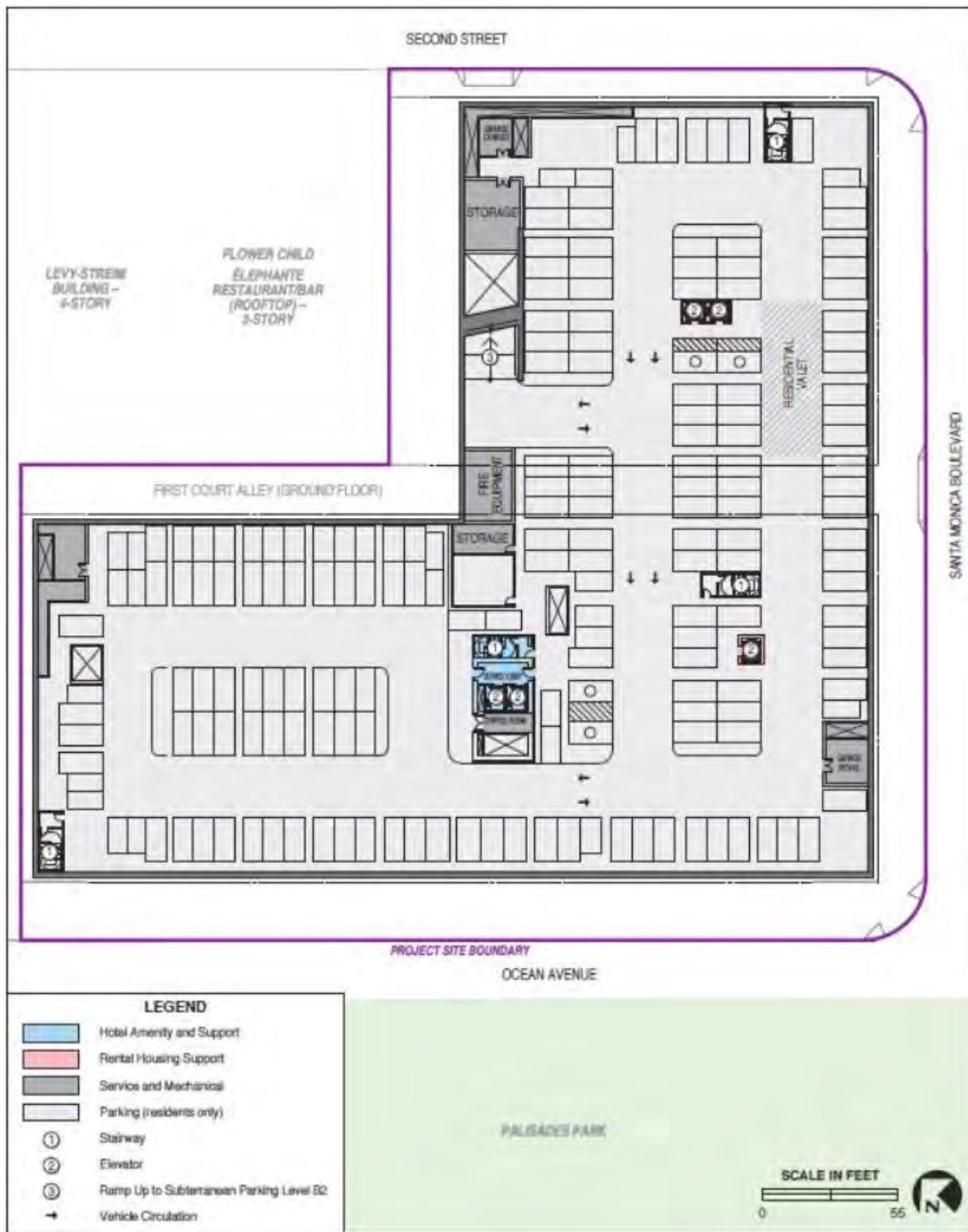
BASEMENT LEVEL 1 PLAN

OCEAN AVENUE PROJECT
Santa Monica, California



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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

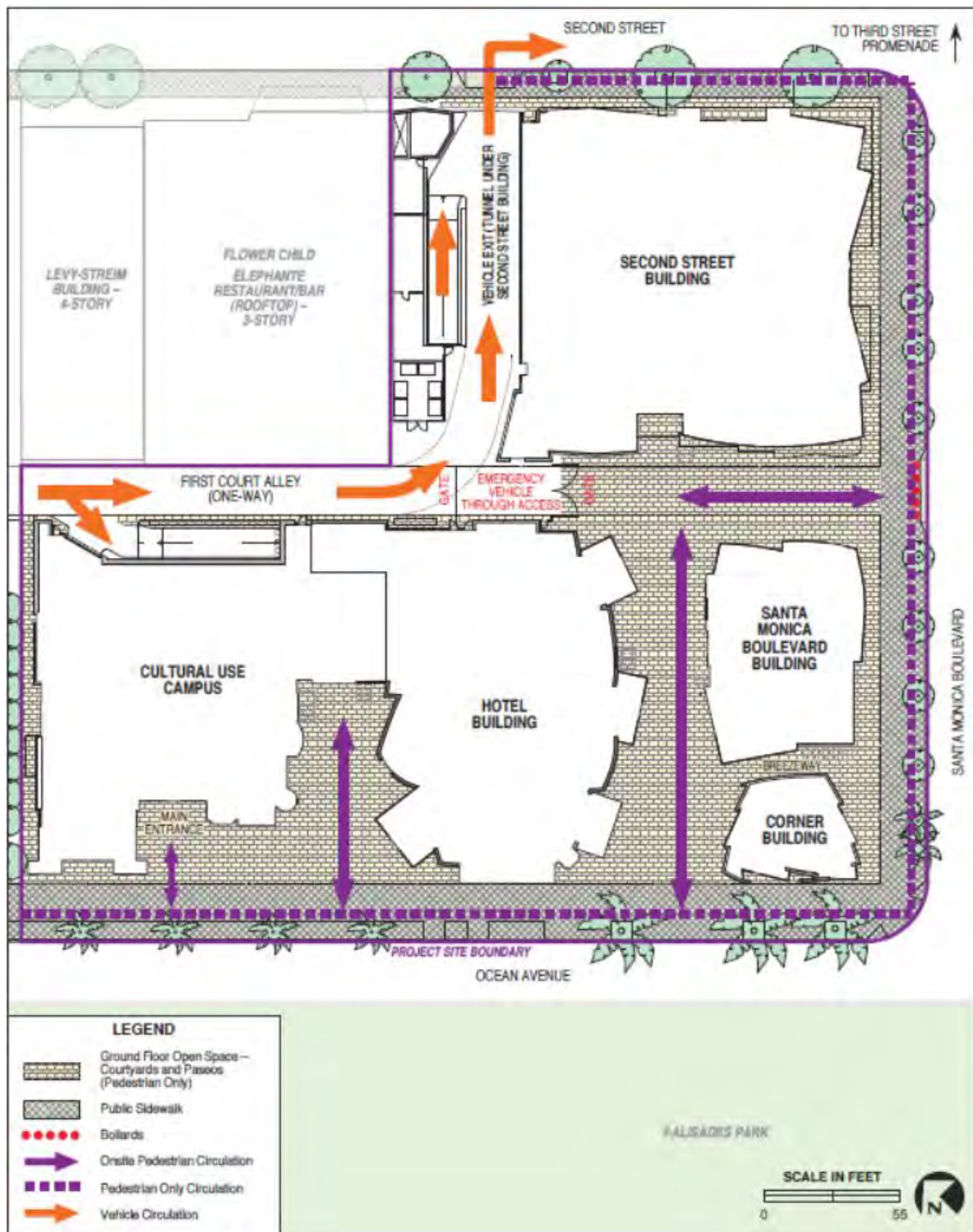
FIGURE 5-11

BASEMENT LEVEL 3 PLAN

OCEAN AVENUE PROJECT
Santa Monica, California



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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

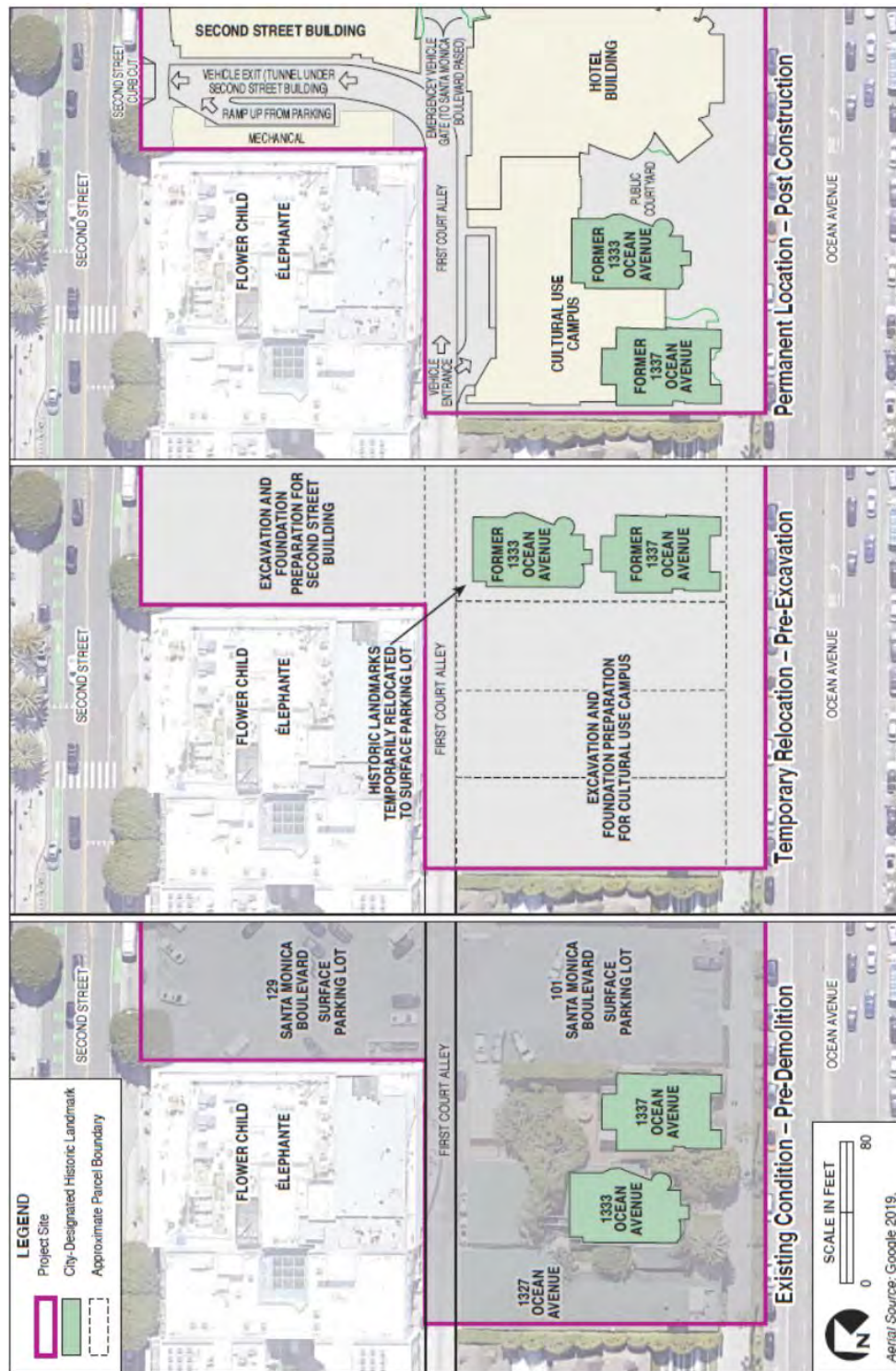
FIGURE 5-12

CIRCULATION-ACCESS PLAN

OCEAN AVENUE PROJECT
Santa Monica, California



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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-13

LANDMARK RELOCATIONS PLAN

OCEAN AVENUE PROJECT
Santa Monica, California



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CONCEPTUAL PROPOSAL

(subject to design review and approval by Planning Commission, ARB, Landmarks Commission, and/or other review process/body)

FIGURE 5-14

PROJECT ILLUSTRATIONS

OCEAN AVENUE PROJECT

Santa Monica, California

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H. CUMULATIVE IMPACTS

Cumulative impacts to historic resources evaluate whether impacts of the proposed project and related past, present, or future projects, when taken as a whole, substantially diminish the number of historic resources within the same or similar historic context or property type. Impacts to historic resources, if any, tend to be site specific. However, cumulative impacts would occur if the proposed project and related projects cumulatively affect historic resources in the immediate vicinity or involve resources that are examples of the same style or property type as those within the proposed project site.

All new development and redevelopment within the City is required to comply with applicable federal and state regulations governing historic resources. While impacts to historic resources could occur at discrete locations, demolition of a number of buildings would have the potential to compromise the overall historic fabric of the City. Based on the related projects identified, development in the City is not expected to alter historic resources on a widespread scale. Therefore, cumulative impacts would be considered less than significant.

As described in this EIR, related projects have been identified. It is possible that some of the related projects could demolish buildings deemed to be a historic resource that were built in a similar architectural style, or of a similar property type, or even potentially by the same architect. At the proposed Project site with the implementation of the proposed mitigation measures described herein the potential significant impacts to historic resources would be reduced to a less than significant level. During construction, however, the Project would have a potentially significant ground-borne vibration impact to a City-designated Landmark property located adjacent to the Project site, as indicated in Section 3.11, Noise, of the EIR. There are no cumulative projects nearby that would add to construction vibration impacts to historical resources. Therefore, the proposed Project would not contribute to the overall loss of historic resources with similar historical or architectural context, and potential Project-related cumulative impacts to historic resources, considered together with related projects, would be less than significant.

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6. MITIGATION MEASURES

A. CEQA MITIGATION APPROACHES

According to CEQA, mitigation may include:

- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
- Compensating for the impact by replacing or providing substitute resources or environments;⁵² and
- Utilizing the Secretary of the Interior's Standards of Rehabilitation and Guidelines for Rehabilitating Historic Buildings.⁵³

B. APPLICABLE MITIGATION MEASURES FROM DCP EIR

There are no applicable mitigation measures regarding historic resources from the adopted MMRP of the DCP Program EIR.

C. PROJECT MITIGATION MEASURES

CEQA requires the Lead Agency to examine and impose mitigation measures or feasible project alternatives that would avoid or minimize any impacts or potential impacts to identified historic resources. A goal of the proposed Project is historic preservation of historic resources. The two existing City-designated landmarks located on the Project Site will be retained, relocated on site, and rehabilitated for adaptive use pursuant to the SOI Standards. Therefore, the proposed Project would not demolish or materially alter in an adverse manner

⁵² CEQA Guidelines, Section 15370.

⁵³ CEQA Guidelines, Section 15064.5(b)(3).

any character-defining features of the resources that convey their historical significance or their formal recognition as City designated Landmarks. However, as the project plans reviewed for this environmental assessment are considered conceptual and such plans have not yet been finalized, it is possible that final project design could include elements that would result in a potentially significant impact to the historic resource. Therefore, the following mitigation measures are required to implement the proposed Project to ensure that potential impacts to the resources are reduced to less than significant.

1. ARCHIVAL RECORDATION DOCUMENTATION

Prior to the issuance of any permit, demolition, abatement, grading/excavation, relocation, or rehabilitation work the two City-designated Landmark buildings on-site the Project Applicant shall have prepared recordation documents similar in format and content to an Historic American Buildings Survey (HABS) Level III recordation document. The work shall be completed by a qualified historic preservation professional with at least five (5) years of relevant experience who meets the requirements of the U.S. Secretary of the Interior's Professional Qualifications for history, architectural history, and/or historic architecture (pursuant to 36 CFR 61). A HABS-like document shall be prepared for each historic resource. The document shall record the history of the property and its contextual relationship to the downtown area and its historical association with the overall history of the community. In addition, the architectural history and design of the property shall be addressed. Its physical condition, both historic and current, shall also be noted in the document through the use of site plans, illustrations, and drawings, as available; historic maps, photographs, and postcards as well as current photographs and written data and text. Field photos and notes shall also be included as supporting material. All document components should be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (HABS standards). Each recordation document shall include at a minimum:

- A written historic and descriptive report completed in narrative format. The report shall be stored onto a labeled CD for safekeeping and distribution.
- A sketch floor plan for each floor level of the building, as applicable. A sketch plan of the entire site of the property is also required. Such illustrations shall be scanned and stored onto a labeled CD for safekeeping and distribution. These photos will also serve as graphic documentation for the Historic Structures Report described in mitigation measure 2.
- High-resolution digital photographs in accordance with Historic American Buildings Survey (HABS) guidelines and standards shall be included in the report.

Views shall include contextual views, all exterior elevations, details views of significant exterior architectural features of the property (site, grounds, building features and architectural details). Such photographs shall be logged, tagged, and collected onto a media storage device for safe archiving and copies provided to those repositories receiving the finished HABS document. A site plan coordinated with the photo log should also be included. Such photographs shall be stored onto a labeled CD for safekeeping.

- Any available historic photographs, postcards, maps, and other historic illustrations of the property shall be reproduced digitally or photographically and included in the recordation document. Such digital material shall also be stored onto a labeled CD.

The high-resolution digitized HABS documentation shall be submitted to the City (Community Development, City Planning Division) for review and final filing in the corresponding Landmark property file. In addition, digital copies of each recordation document shall be prepared and offered to each of the following entities:

- Santa Monica Conservancy
- Santa Monica History Museum
- City of Santa Monica Public Library (Main Branch, local history collection)
- On-site Cultural Use Campus

2. PRESERVATION-PROTECTION PLAN

As a primary objective of the project, the proposed relocation and rehabilitation work on the two City-designated Landmark buildings is intended to ensure that they retain their historical significance as historic resources. Accordingly, the development of a Preservation-Protection Plan by the Applicant will help to support conformance with applicable SOI Standards. At a minimum, a Preservation-Protection Plan shall be prepared for the two historic buildings and their associated character-defining features. Such a document shall include the following and shall be submitted to the City for review and approval upon draft completion and final completion.

- Architectural recordation of existing conditions, features, spaces, and materials prior to the commencement of project-related work scopes, including any demolition, excavation, grading, shoring, relocation, or rehabilitation work.

- Materials analysis, conservation and treatment programs identified to assist in the compliant rehabilitation of the two City-designated Landmark buildings.
- Preparation of a Historic Structures Report (HSR) for each Landmark buildings.
- SOI Standards compliant plan reviews, guidance, and construction monitoring by a qualified historic preservation consultant.
- An interpretive program to convey the historical and architectural history of the two Landmark buildings as well as their associated contextual setting and historic character with the other historic properties along Ocean Avenue. Such an interpretive program may be integrated as a component into the proposed Cultural Use Campus.

As part of the Preservation-Protection Plan, an HSR shall be prepared that would include the architectural recordation and assessment of the site, features, materials, finishes, spaces, forms, textures, etc. The HSR would provide documentary, graphic, and physical information about each of the Landmark buildings on the Project site, including their history, character-defining features, and its existing conditions. The report shall also include appropriate methods for relocating, mothballing, and rehabilitating each historic property. Detail information such as the overall treatment approaches of existing exterior features, materials, finishes, spaces, hardscape elements, etc. for each landmark resource along with short-term and long-term treatment and maintenance recommendations should also be included in the HSR. The treatment program would involve conditions investigations, testing, research, and the identification of necessary repairs by a team of qualified historic architects, architectural historians, structural engineers, and conservators. As necessary, a materials conservation assessment for each identified historic building should also be included in the HSR. This report shall be prepared according to the National Park Service publication *Preservation Brief 43: The Preparation and Use of Historic Structures Reports*. A copy of this report shall be submitted to the City's Landmarks Commission staff liaison for review and approval prior to the submittal of 25% completion plans (demolition, relocation, grading/excavation, architectural, structural, landscape, etc.) for formal design review and plan check by the City. Final high-resolution digital copies of this report shall also be donated to the Santa Monica Public Library, Santa Monica Conservancy, and Santa Monica History Museum, at a minimum, and may be provided to the proposed on-site Cultural Use Campus.

The Preservation-Protection Plan shall stipulate that the Applicant retain a qualified historic preservation professional with at least seven (7) years of relevant experience who satisfies the Secretary of the Interior's Professional Qualification Standards for History,

Architectural History, and/or Architecture pursuant to 36 CFR 61 to assist in the design (for SOI Standards compatibility), SOI Standards design review, and monitoring of the project. Any plans prepared for the project and submitted to the City for review shall be also assessed for SOI Standards compliance by City staff and as deemed appropriate the City's Landmarks Commission.

The Preservation-Protection Plan, including information drawn from the HSR, shall also guide the development of a publically accessible interpretive program on the history and architecture of the two on-site Landmark buildings and their historical, cultural, and architectural context (significance) with the immediate setting, downtown area, and community at-large.

3. HISTORIC PRESERVATION PROFESSIONAL OVERSIGHT

Any work scopes developed for the two Landmark buildings on-site shall be developed in coordination with a qualified historic preservation professional. In addition, any re-design efforts of project plans, finalization of project plans, or preparation of construction/structural related drawings for plan check, building and safety or other related reviews by the City shall be assessed by a qualified historic preservation consultant for consistency with the approved EIR project components and relevant mitigation measures as well as for compliance with the SOI Standards. The Applicant shall obtain the services of a qualified historic preservation professional with at least seven (7) years of relevant experience to review, comment on, and verify the Project plans consistency with the SOI Standards and applicable mitigation measures.

As relevant, other roles of the historic preservation professional shall be to review relocation, mothballing, structural, construction, rehabilitation designs and construction activities that could potentially affect character-defining features of identified historic Landmark buildings in this EIR and the Historic Structure Report, as addressed in these mitigation measures. This consultant shall have a structural engineer and conservator available for consultation. The consultant's main responsibility shall be to monitor and advise the Applicant team in coordination with City staff regarding compliance with the SOI Standards with respect to elements of the two Landmark buildings that would be retained; repaired, as necessary; stabilized; and replaced, if deemed necessary as well as compatible relocation, mothballing, design and adaptive use criteria. Through a series of Project-related development, design, and specification review meetings, as well as on-site construction monitoring, the historic preservation consultant shall work in conjunction with City staff and Applicant's project team. In addition, the consultant shall review and comment on any mock-ups and/or test panels of treatments to historic fabric prepared by the Applicant for review and approval by the City. In consultation with other experts, the consultant shall assist in the approval of materials and replica designs used in the restoration/reconstruction, rehabilitation, and new construction related to the designated historic properties. Monitoring reports would be submitted to the City's Landmarks Commission

staff liaison on a periodic basis (submission schedule of monitoring reports would be established in consultation with the Landmarks Commission staff liaison).

4. SANTA MONICA LANDMARKS COMMISSION

As required under the City's Landmarks and Historic Districts Ordinance (SMMC Chapter 9.56) a Certificate of Appropriateness (or equivalent approval pursuant to the Development Agreement) issued by City Landmarks Commission is required for any proposed alteration, restoration, construction, removal, or relocation work, in whole or in part, to either Landmark building on-site (SMMC 9.56.140). Any subsequent alterations or modifications to approved COAs or related project plans associated with either Landmark building may require additional review and approval by the City's Landmarks Commission or staff liaison.

5. SOI STANDARDS COMPLIANCE

Any maintenance, repair, stabilization, rehabilitation, relocation, preservation, conservation, or reconstruction proposed for any exterior portion of the Queen Anne style Landmark building and/or the Spanish Colonial Revival style Landmark building, including the stabilization, mothballing, repair, and where necessary the replacement, of any exterior character-defining features or those qualities that render the property historically significant, shall be conducted in a manner consistent with the SOI Standards. Compliance with the SOI Standards shall be monitored by the supervising historic preservation professional and the Landmarks Commission staff liaison.

Such work shall have specifications for their treatment as identified in the Preservation-Protection Plan contained in the general specifications for the approved Project. The specifications shall include (but are not limited to), sections addressing the relocation, stabilization, and mothballing of the historic buildings; the treatment of historic fabric; quality control; appropriate paint colors(s); substitution procedures; demolition; selective removal and storage of historic materials; protection, patching, and cleaning and stripping methods utilizing chemical or physical treatments that do not abrade or damage significant substrates and surfaces; determination of repair options and the potential replacement of severely deteriorated features.

6. CALIFORNIA HISTORICAL BUILDING CODE COMPLIANCE

Where applicable, any work for code mitigations such egress, fire safety, railing heights, door widths, ADA accessibility, etc. shall utilize and follow the perspective code of the California Historical Building Code and the relevant guidelines specific in the SOI Standards and NPS briefs, bulletins, references and guidelines.

7. SEISMIC RETRO-FIT PLANS AND REVIEWS

Any and all seismic plans to stabilize and retro-fit the two historic Landmark buildings shall be prepared for the proposed Project and shall comply with the California Historical Building Code and the relevant guidelines specific in the SOI Standards and NPS briefs, bulletins, references and guidelines. Such plans shall be reviewed and approved by the historic preservation consultant for compliance with the SOI Standards prior to formal submittal to the City for review, plan check and building and safety review. The methodology and approach of the seismic retro-fit work proposed for the two historic buildings shall be integrated as part of the Preservation-Protection Plan prepared for this project.

8. PROJECT PLANS AND REVIEWS

Any and all project plans, including but not limited to architectural, structural, mechanical, relocation, landscape plans shall be prepared by the Applicant and reviewed and approved by the qualified historic preservation professional for compliance with the SOI Standards prior to formal submittal to the City for design review, plan check and building and safety review. Based on comments received from the required City reviews, any redesign efforts or changes to the submitted project plans shall be reviewed and approved by the historic preservation consultant for compliance with the SOI Standards prior to re-submittal. Any subsequent alterations or modifications, including field changes, to approved project plans associated with either Landmark building will require additional review and approval by the historic preservation consultant for compliance with the SOI Standards prior to final approval by the City.

9. HISTORIC MATERIAL REPLACEMENT

In compliance with the SOI Standards, in cases where the project would replace a distinctive historic feature or material, the new feature shall match the old in design, type, color, texture, profile, material, and overall appearance. Consistent with the SOI Standards, all such work shall be accurately reproduced based on historical, pictorial, and physical documentation and evidence. Such replacement of features shall be supported by investigations and studies conducted as part of the Preservation-Protection Plan prepared for this project.

10. COMPATIBLE NEW CONSTRUCTION

As the project plans reviewed for this environmental assessment are considered conceptual and such plans have not yet been finalized, it is possible that final project design could include elements that would result in a potentially significant impact to the historic resources on-site. Therefore, for any new construction proposed, the historic preservation consultant shall consult with the Applicant team during the entire design process to insure that the new

permanent built forms are compatible with the historic qualities and characteristics of the historic buildings located within and adjacent to the Project site. New construction work associated with the two on-site historic Landmark buildings shall be designed and executed in accordance with the concepts described in the SOI Standards and *Preservation Brief No. 14: New Exterior Additions to Historic Buildings, Preservation Concerns* published by NPS. Such proposed work shall be addressed as part of the Preservation-Protection Plan prepared for this project.

11. RELOCATION/CONSTRUCTION MONITORING

The Preservation-Protection Plan requires the Applicant to retain a qualified historic preservation professional with at least seven (7) years of relevant experience who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, and/or Architecture pursuant to 36 CFR 61, to provide guidance and oversight for the preservation, relocation, and rehabilitation of the two historic Landmark buildings on-site. Once the project has been approved and entitled, the historic preservation professional shall conduct on-site construction monitoring during the relocation, demolition, excavation, and construction phases of the project. The monitor shall prepare the necessary written, photographic, and illustrated documentation in a series of construction monitoring reports or memos. The completed monitoring documentation shall be submitted to the City for inclusion in the respective historic property's file on a regular basis depending on the scheduling of the project phase and various work scopes. A final on-site sign-off of the completed project is required by the consulting historic preservation professional monitor in coordination with the project general contractor/design team and City staff (Landmarks Commission staff liaison, building inspector, etc.) prior to the issuance of a certificate of occupancy.

The City may also make periodic site visits to assess the condition of the historic properties and their associated character-defining features during the duration of the construction related work. The City may also consult with their preservation consultant if any issues or problems concerning either historic property arise. If either of the historic properties and their associated character-defining features are damaged or may be potentially damaged by any particular construction related activity the City may prescribe corrective measures to the Applicant, including halting construction in situations where such activities would imminently endanger the on-site resources or associated character-defining features. The applicant shall adhere to the City's recommendations and any necessary repair or stabilization work shall be conducted by the applicant team in accordance with the SOI Standards.

12. VIBRATION IMPACT MEASURES AND MONITORING ASSESSMENTS

Damage by vibration during construction related activities such as demolition, boring, drilling, and/or excavation work of improvements, foundations, grading, augercast piles (or equivalent), etc. may occur to fragile character-defining features of the historic resources located on the Project site and adjacent to the Project area. Therefore, in coordination with the City and qualified historic preservation professional the Applicant shall assure avoidance of vibration impacts to such resources and their associated character-defining features, as identified in the Preservation-Protection Plan, by preparing a pre-construction vibration survey report and post-construction damage assessment survey report. These reports shall be prepared by a qualified independent structural engineer with qualifications in completed historic preservation projects that conformed to the SOI Standards. These reports shall be submitted to the City for review and approval prior to initiating any type of construction work activity on site (pre-construction vibration survey report) and upon completion of such work (post-construction damage assessment survey report).

Periodic on-site monitoring by the independent structural engineer shall also be conducted to assess for any vibration damage to the identified historic resources and their associated character-defining features that may have been caused by construction related activities. If vibration levels are detected by the independent structural engineer that may cause damage to such resources and features, steps will be taken by the Applicant in consultation with the independent structural engineer to stop the vibration before damage to the historic resources and features occur. Such steps may include the use of low impact boring and drilling equipment, and the stabilization of the historic properties or their affected features prior to any construction-related work activities. If it is determined and agreed upon between all interested parties (Applicant, structural engineer, and City) at the project on-set (prior to the implementation of any construction related activities as noted) that physical damage to the identified historic resources and their character-defining features shall not occur due to construction-related vibration then such reports and monitoring are not required. This justified determination should also be addressed and included in the Preservation-Protection Plan.

13. SHORING PLAN

A shoring plan shall be implemented as part of the Preservation-Protection Plan by the Applicant to ensure the protection of on-site and adjacent historic resources during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of soils in and around the location of the on-site Landmark buildings.

14. UNANTICIPATED DISCOVERIES

The Applicant should be aware of the possible encounter of unanticipated discoveries on site upon implementation of the Project, particularly during excavation, grading, demolition, and relocation activities. In the event that any unusual or distinctive architectural features associated with the design or use of the Landmark buildings are encountered during site preparation, grading, demolition, excavation, relocation, or construction activities around the two sites work will be immediately stopped and relocated from that area until it can be assessed by the City or qualified on-site historic preservation consultant. Such features, if determined to be important character-defining features of either building, will need to be assessed, possibly salvaged, and reused in the project as directed by the preservation consultant in coordination with the Applicant and City staff. Upon concluding the assessment work may resume in the previously halted area. Examples of such features and materials may include decorative features, siding material, door and window hardware, roof related features, bricks, clay tiles, among other items.

15. INTERPRETIVE EDUCATIONAL PROGRAM

To assist the public in understanding the historical, cultural, and architectural significance of both the Queen Anne style Landmark building and the Spanish Colonial Revival style Landmark structure commemorative interpretive signage, displays, and/or plaques shall be created and incorporated into the Project site, particular as part of the Cultural Use Campus. The displays, signage, plaques and exhibits created for the site may incorporate salvaged “period appropriate” items from the historic buildings and any historical information, photographs, postcards, plans and illustrations, maps and brochures, etc. of the buildings, Ocean Avenue, the downtown commercial area in a creative medium accessible or visible to the public. The interpretative exhibit elements should include visual and narrative information specific to the early residential development of Ocean Avenue, the early economic commercial development of the downtown area, the architectural history and design of both the Queen Anne style and the Spanish Colonial Revival idiom as applied to the relevant property types under review, and the history of the Town of Santa Monica Tract and its relationship to the two historic Landmark buildings. The robust historical narrative should also highlight the reasons why (and when) the two historic buildings were designated City Landmarks by the Landmarks Commission and what other Landmark properties are nearby the Project site (i.e. Gussie Moran House, Palisades Park, Hotel Shangri-La, Georgian Hotel, etc.). The historic interpretive program (exhibits) shall be located within the publically accessible interior spaces of the two historic landmarks in addition to the interior and exterior areas of the new Cultural Use Campus. This creative/educational component shall be developed with the assistance of a qualified architectural historian or historic preservation professional with at least five (5) years of relevant experience who satisfies the applicable Secretary of the Interior’s Professional Qualifications Standards pursuant to 36 CFR 61.

7. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Victorian House currently located at 1333 Ocean Avenue as well as the Spanish Colonial Revival style commercial building at 1337 Ocean Avenue are both situated within the Project site and are identified as designated City of Santa Monica landmarks. Therefore, they are considered historic resources under the CEQA Guidelines and are subject to CEQA review.

The Ocean Avenue Project proposes the redevelopment of approximately 82,569 square feet of land (1.89 acres) within the identified Project site with a mixed-use project designed by Gehry Partners, LLP, and comprised of a hotel, apartments, cultural and historic uses, an elevated public observation deck, retail/restaurant uses, open space, and subterranean parking. Two existing City-designated Landmarks, as mentioned above, are located on the Project site and will be retained, relocated on site, and rehabilitated for adaptive use. As a result, the proposed Project was analyzed for its potential to negatively impact identified historic resources.

Because implementation of the Project will comply with the SOI Standards potential impacts to the two significant historic resources on-site shall be considered mitigated to a level of less than significant. Compliance with the mitigation measures provided herein, which includes oversight for conformance with the SOI Standards, ensures that the proposed relocation, stabilization, mothballing, rehabilitation, and adaptive use of the historic Landmark buildings do not impair those qualities and historic characteristics that convey their historical significance and render them designated local historic resources. In addition, the implementation of the mitigation measures cited herein this report assures the public that the two buildings' historical and architectural contributions to the local history of the community are preserved, promoted, and recognized.

For the adjacent Gussie Moran House, a City-designated Landmark property, construction of the Project has the potential to cause structural damage to the historic resource's character-defining features due to ground-borne vibration. Implementation of the proposed mitigations measures included in this assessment and the noise mitigation measure MM NOI-2, as further analyzed in Section 3.11, Noise, of the EIR, however, would require the voluntary acceptance by the off-site property owner(s).⁵⁴ Although voluntary acceptance by

⁵⁴ As indicated in Section 3.11, Noise, of this EIR, construction on the Project site would result in potentially significant construction vibration impacts to one adjacent structure, the Gussie Moran House at 1323 Ocean

the off-site property owner(s) would reduce this impact to a less than significant level, the City does not have the jurisdiction or control to mandate implementation of these mitigation measures. Because the consent of the off-site property owner(s) cannot be guaranteed, it is conservatively concluded that unless mitigated, the Gussie Moran House Landmark property could have potentially significant and unavoidable vibration impacts.

Avenue, which is a City-designated Landmark. This report addresses impacts to historic resources. Please see Section 3.11 of this EIR for further discussion regarding construction vibration effects.

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APPENDIX

SUPPORTING EXHIBITS

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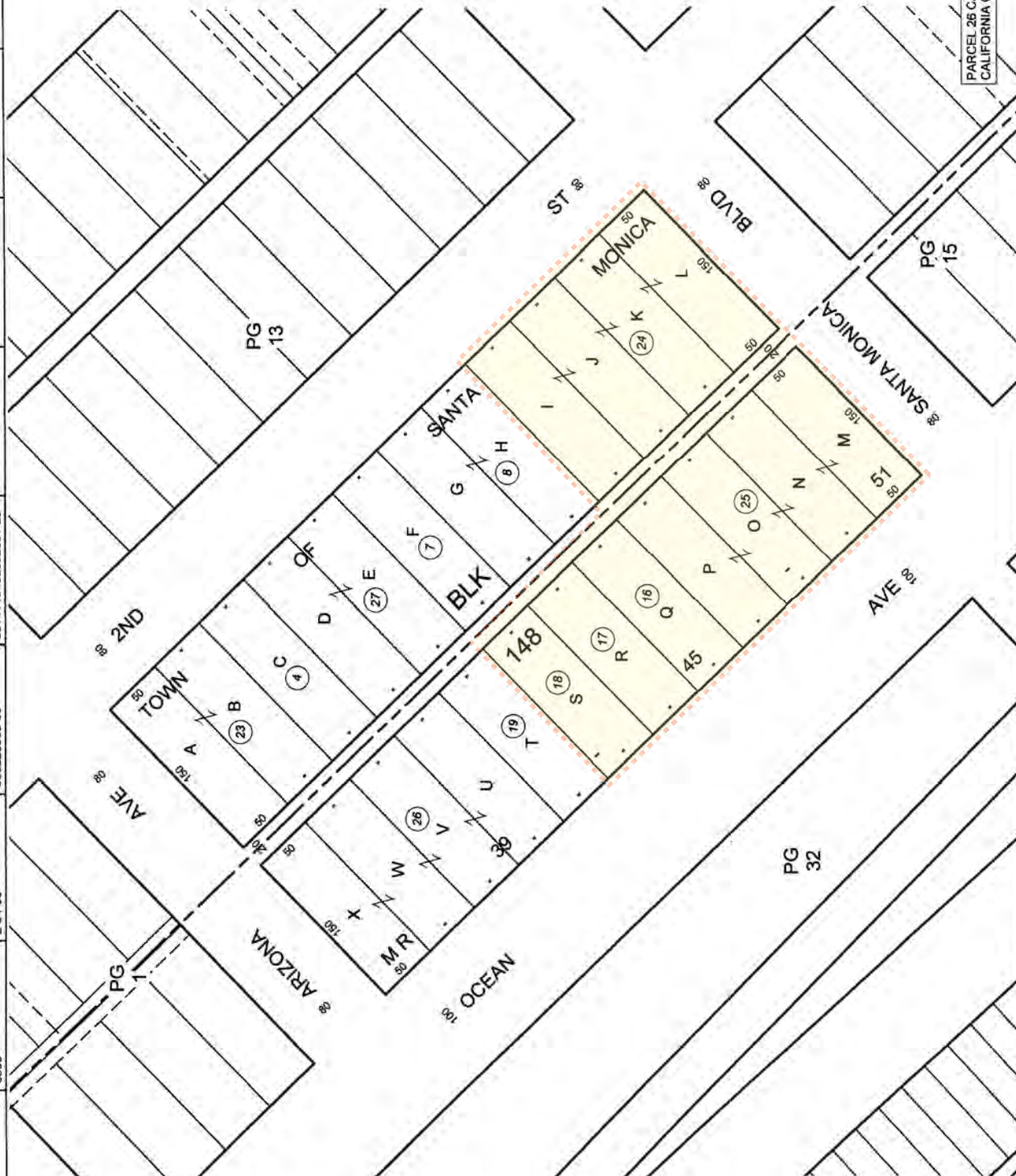
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HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



1333 Ocean Avenue, circa 1907



1333 Ocean Avenue, 1976

HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



1337 Ocean Avenue, circa 1930



1337 Ocean Avenue, circa 1931

HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



101 Santa Monica Boulevard, circa 1926



101 Santa Monica Boulevard, looking east, 1929

HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



101 Santa Monica Boulevard, circa 1937



101 Santa Monica Boulevard, circa 1964

HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



1402 2nd Street, 1970



202 Santa Monica Boulevard, looking east, 1929

HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



202 Santa Monica Boulevard, 1970



1332 2nd Street, 1970

HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



1323 Ocean Avenue, looking east, 1929



1327 Ocean Avenue, 1970

HISTORICAL PHOTOGRAPHS/POSTCARDS

Ocean Avenue Project, Santa Monica, CA



Palisades Park (left)/101 Santa Monica Boulevard, circa 1928



Palisades Park (left)/101 Santa Monica Boulevard, 1955

PHOTOGRAPHS (CURRENT)

Ocean Avenue Project, Santa Monica, CA



1327 Ocean Avenue



1327 Ocean Avenue (interior courtyard area)



1333 Ocean Avenue, front (west) facade



1333 Ocean Avenue, oblique view looking northwest



1337 Ocean Avenue, front (west) facade

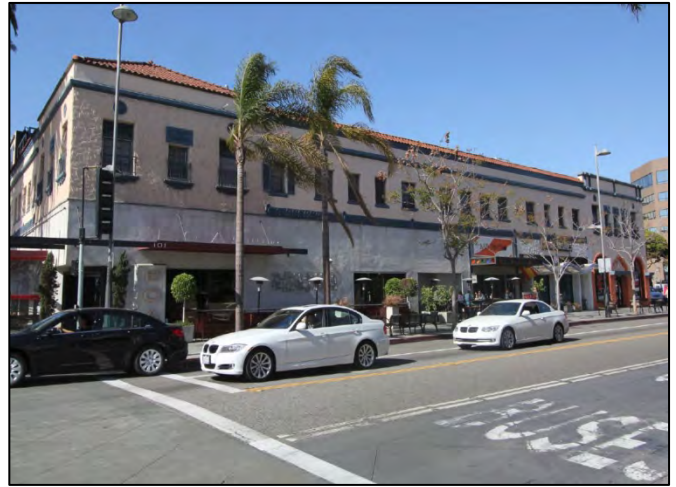


1337 Ocean Avenue, along south elevation

PHOTOGRAPHS (CURRENT)
Ocean Avenue Project, Santa Monica, CA



101 Santa Monica Boulevard, oblique view looking northeast



101 Santa Monica Boulevard, view along south elevation



101 Santa Monica Boulevard, view along west elevation



101 Santa Monica Boulevard, oblique view looking southeast

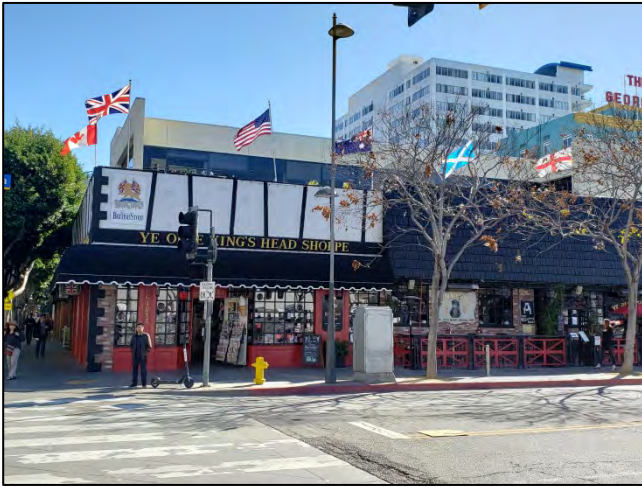


101 Santa Monica Boulevard, view along east elevation



101 Santa Monica Boulevard, view along north elevation

PHOTOGRAPHS (CURRENT)
Ocean Avenue Project, Santa Monica, CA



1402 2nd Street



202 Santa Monica Boulevard



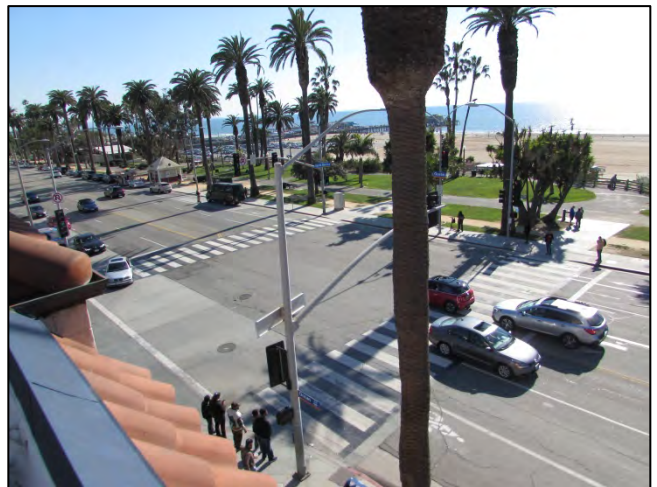
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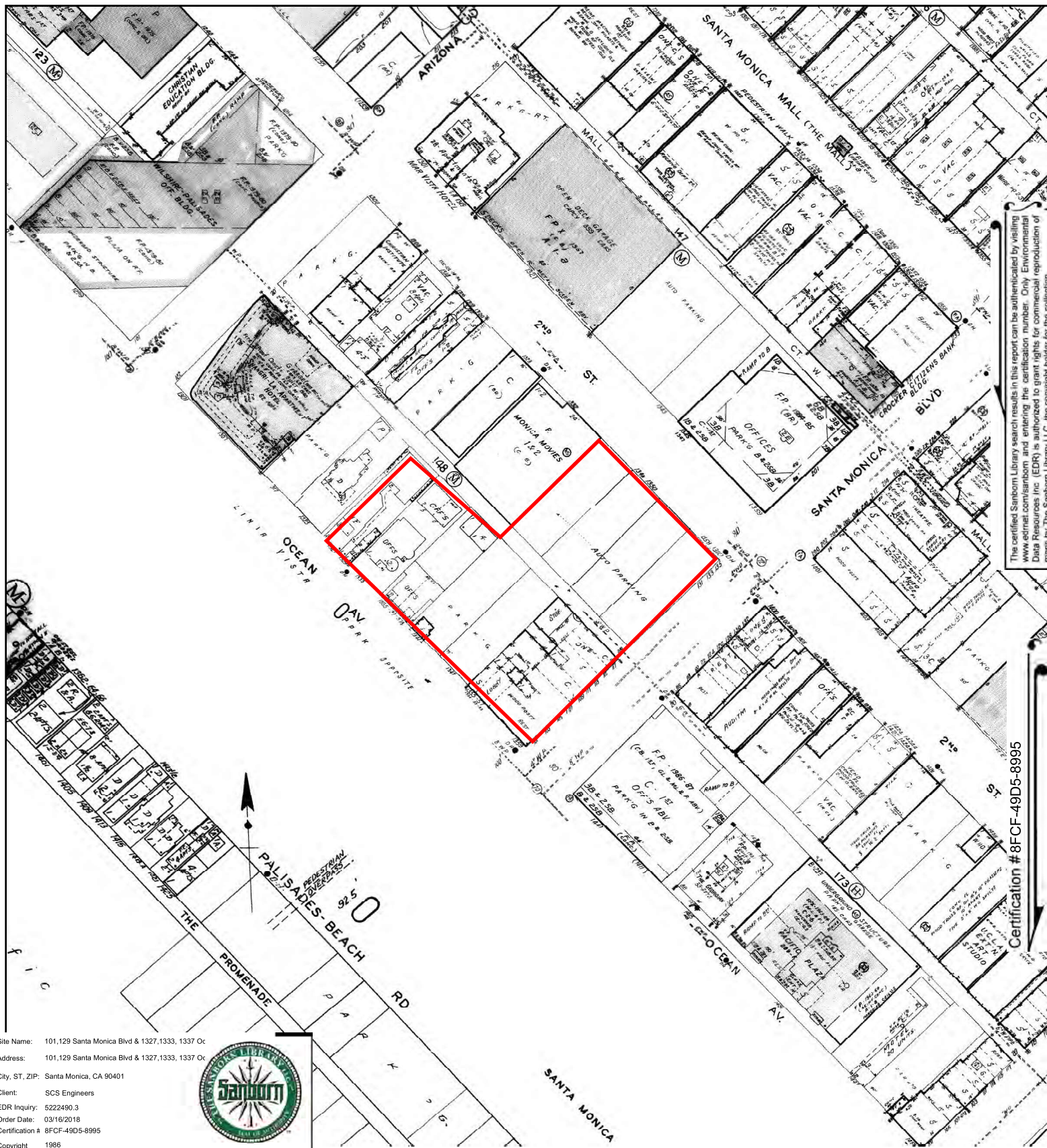


Palisades Park, looking northwest along Ocean Avenue

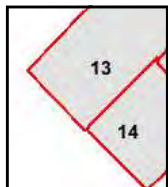


Palisades Park, looking southwest along Ocean Avenue

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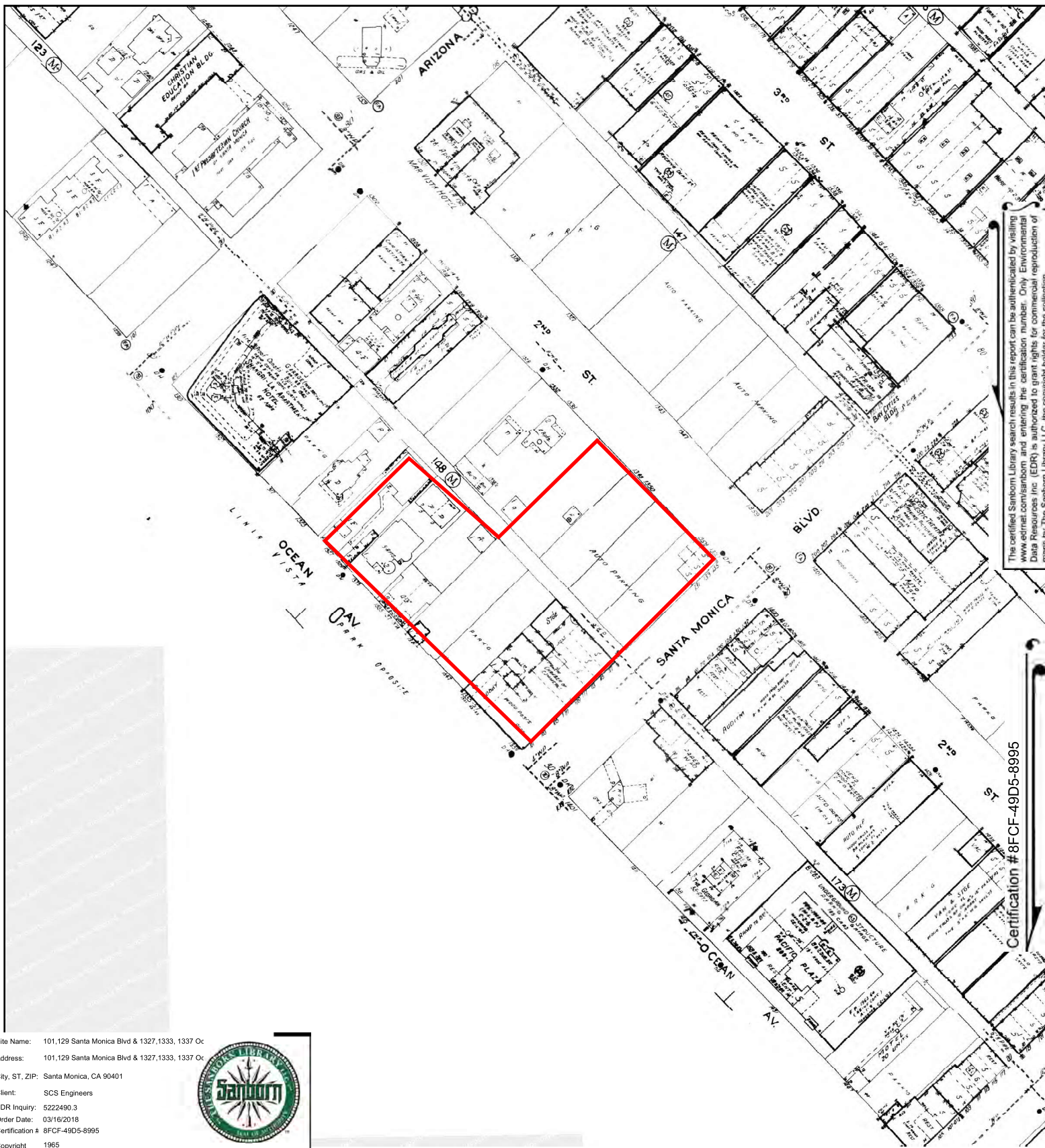
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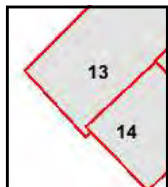
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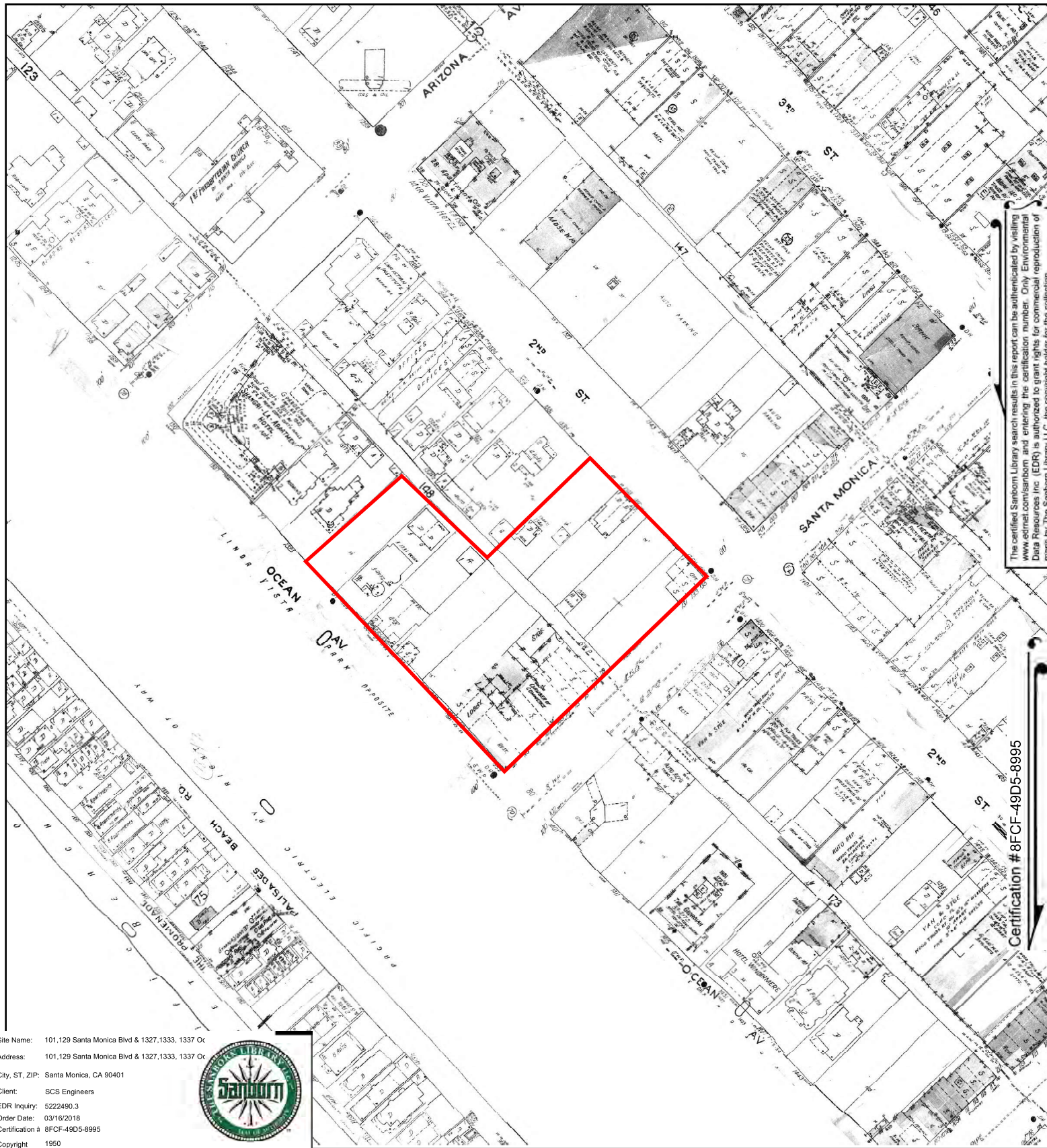
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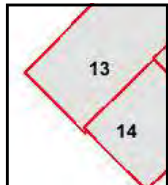
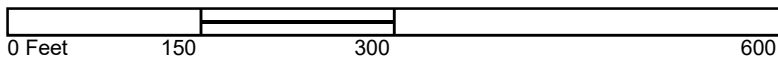
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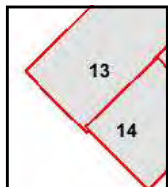
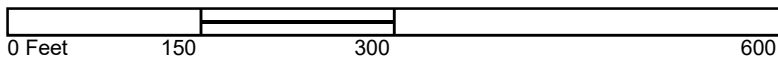
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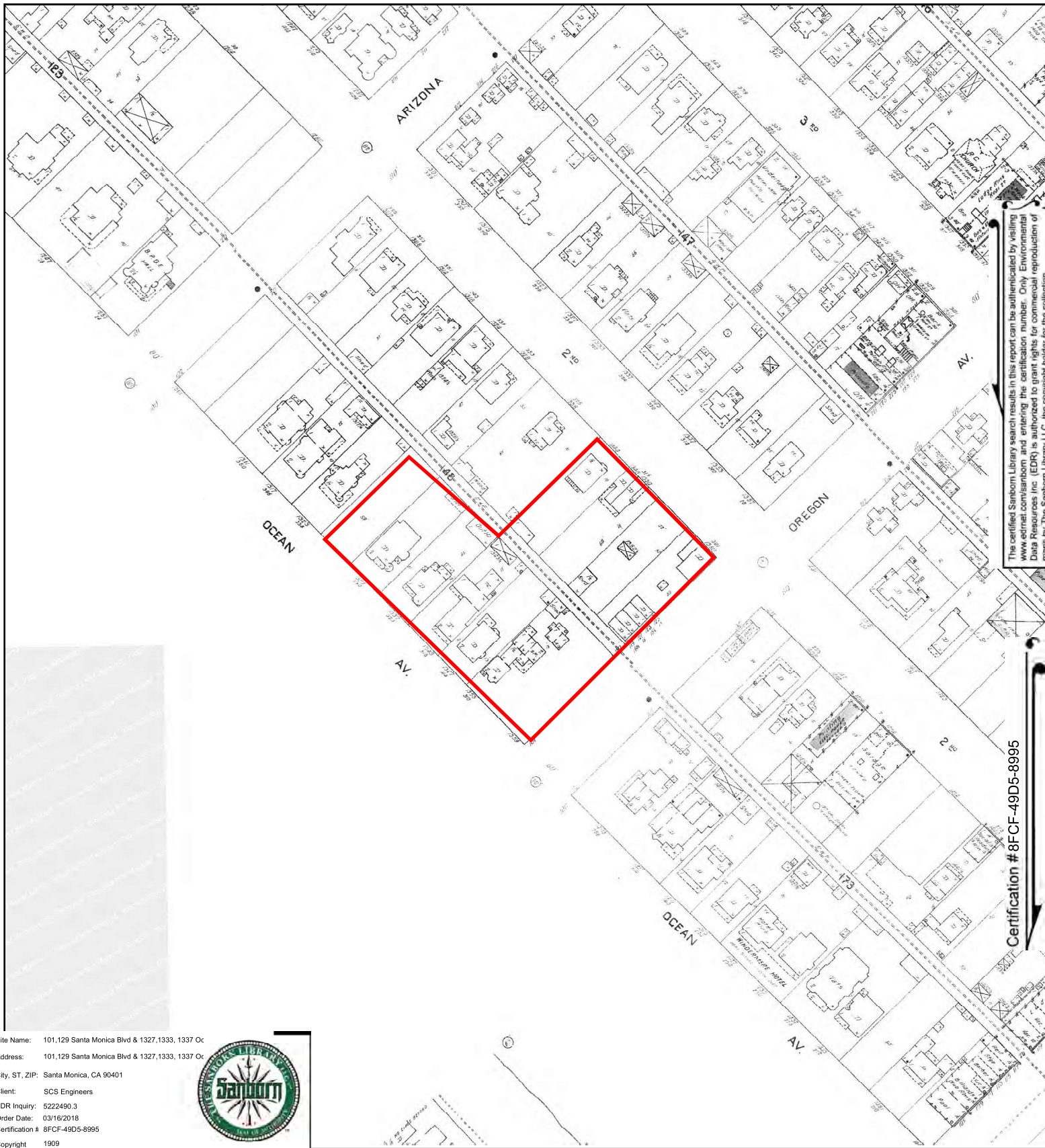


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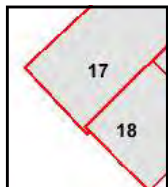
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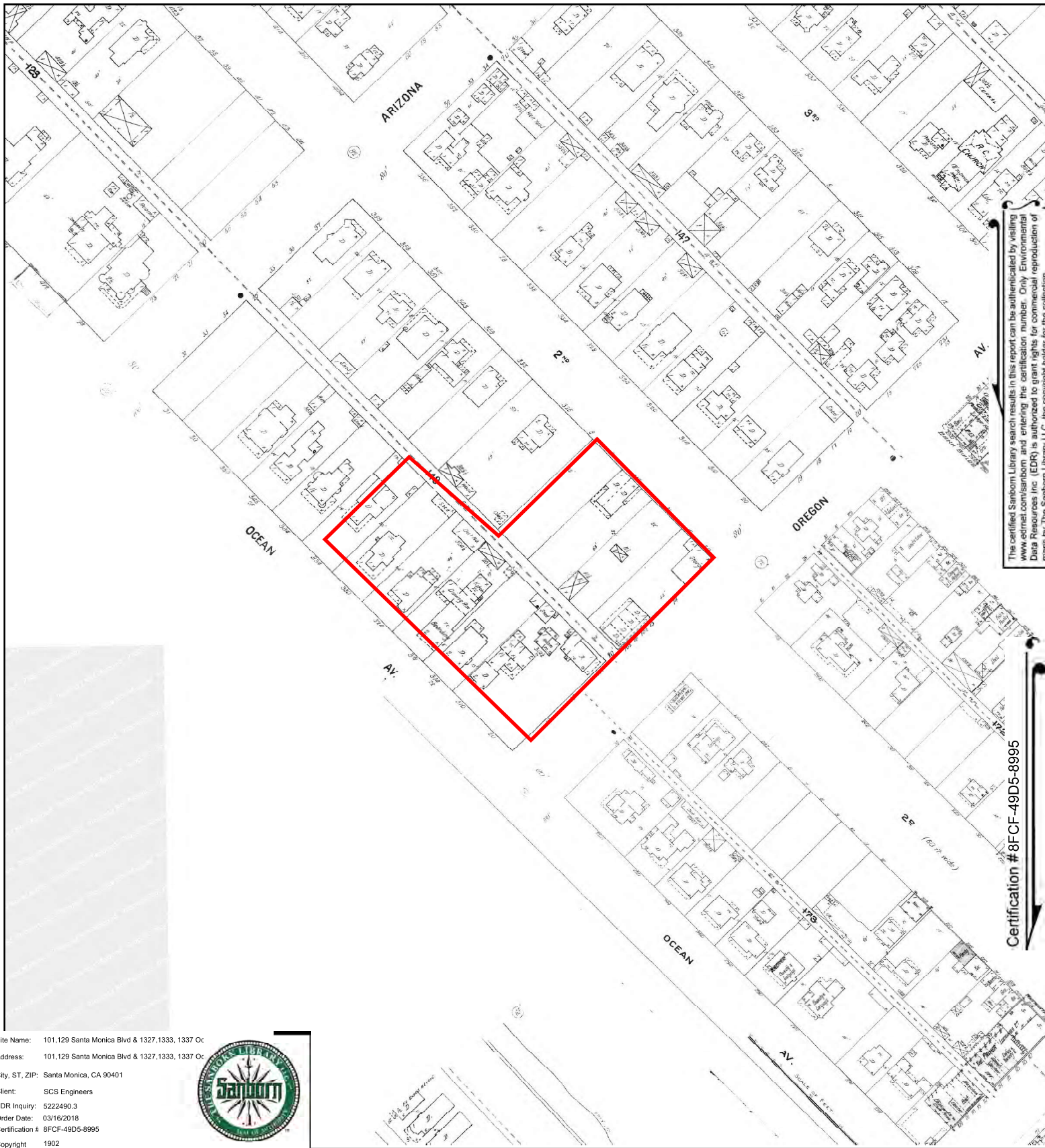


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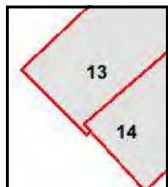
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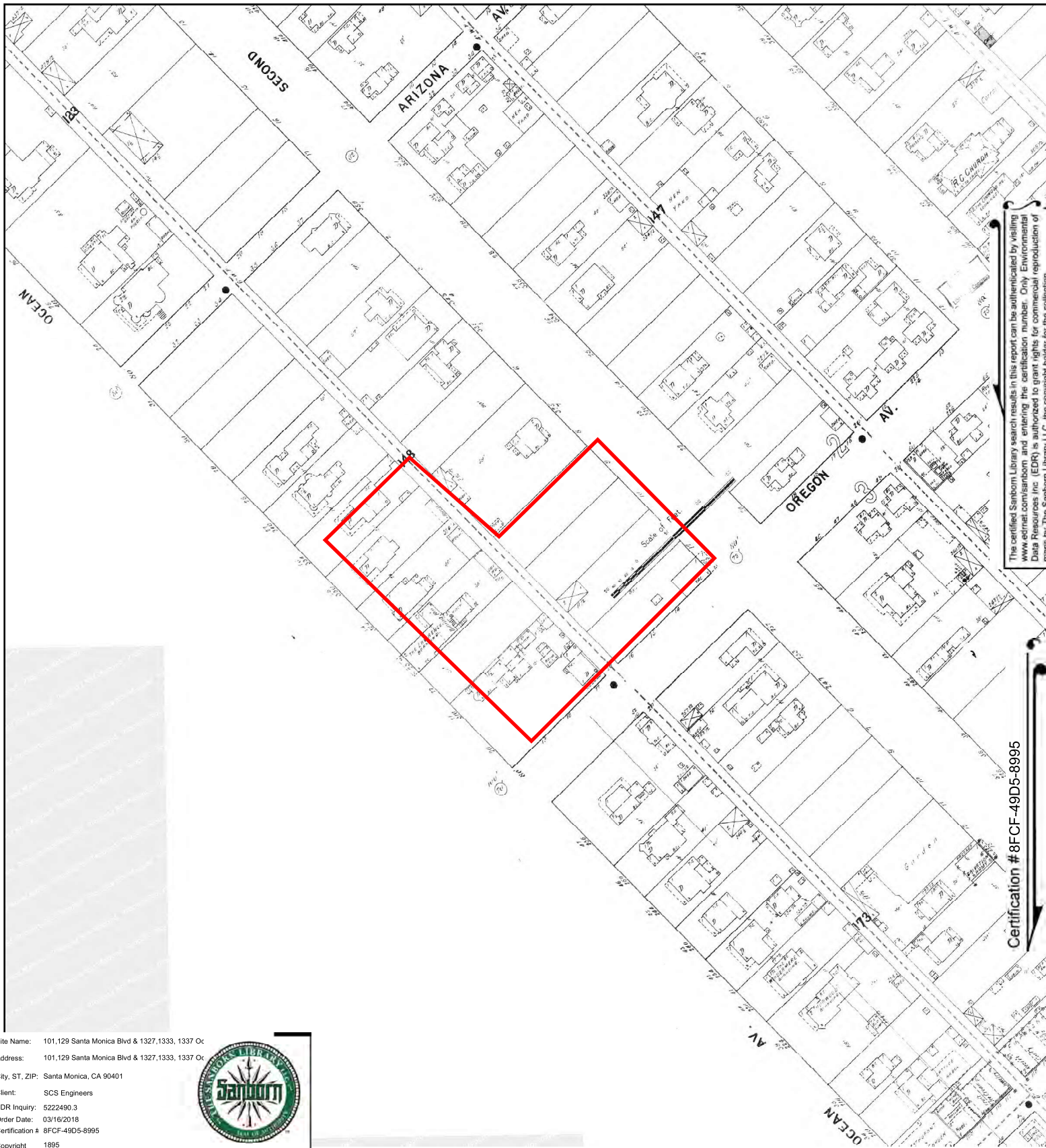
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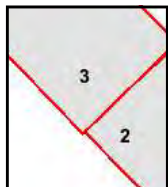
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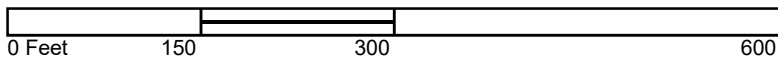
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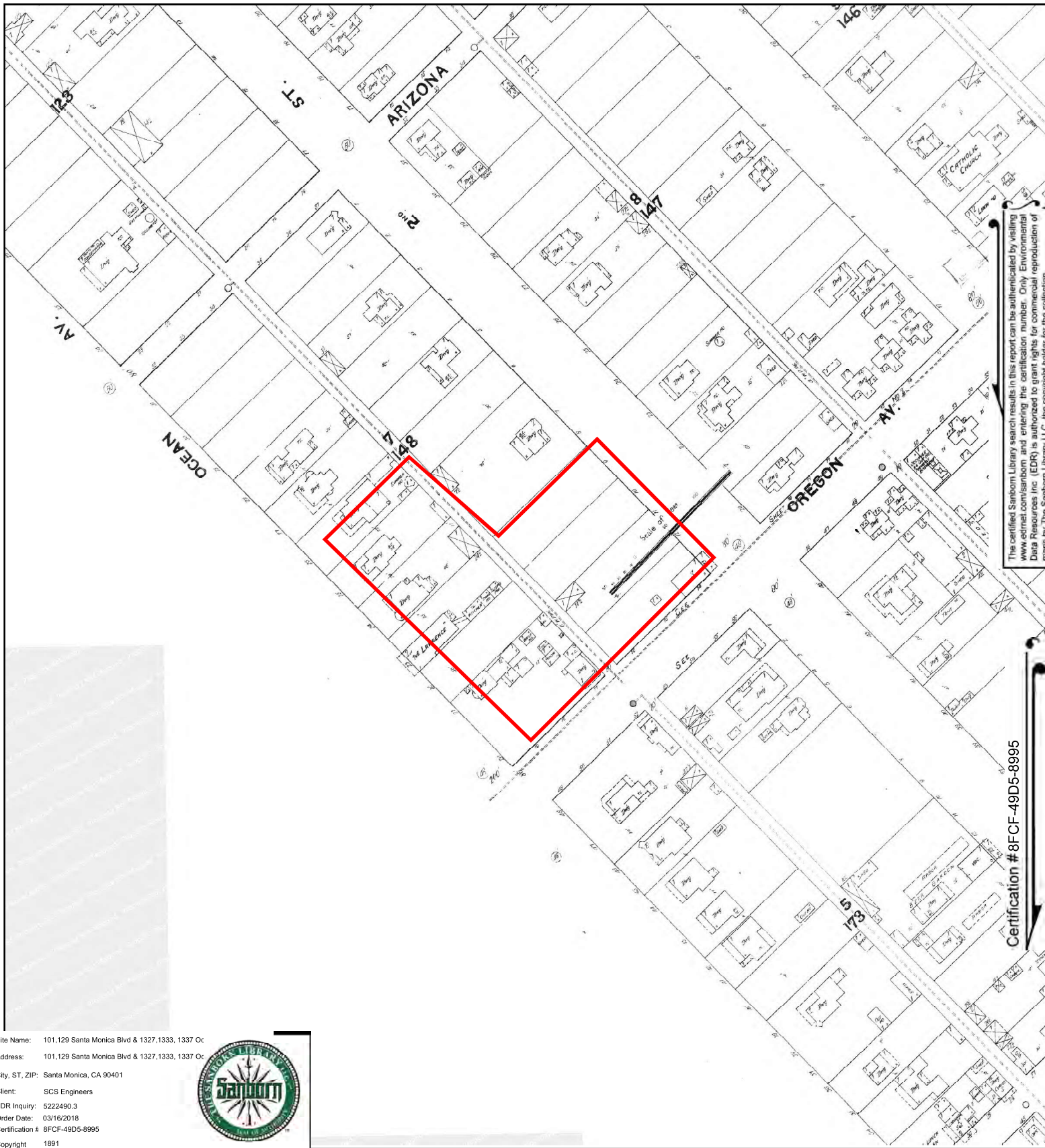


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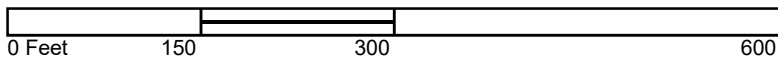
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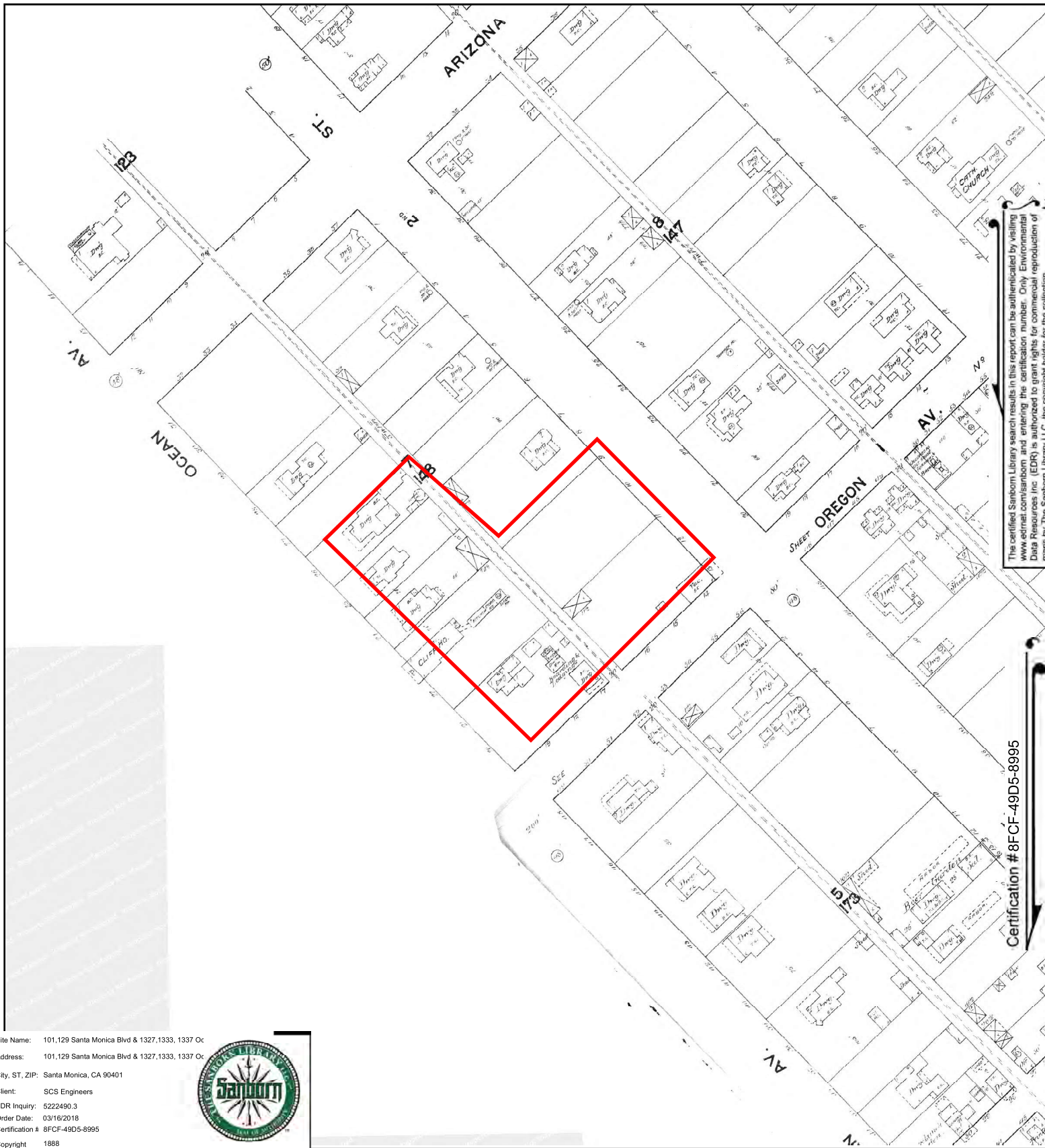


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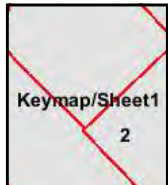
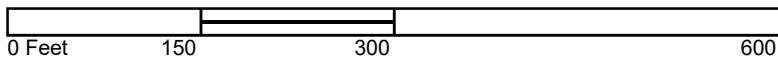




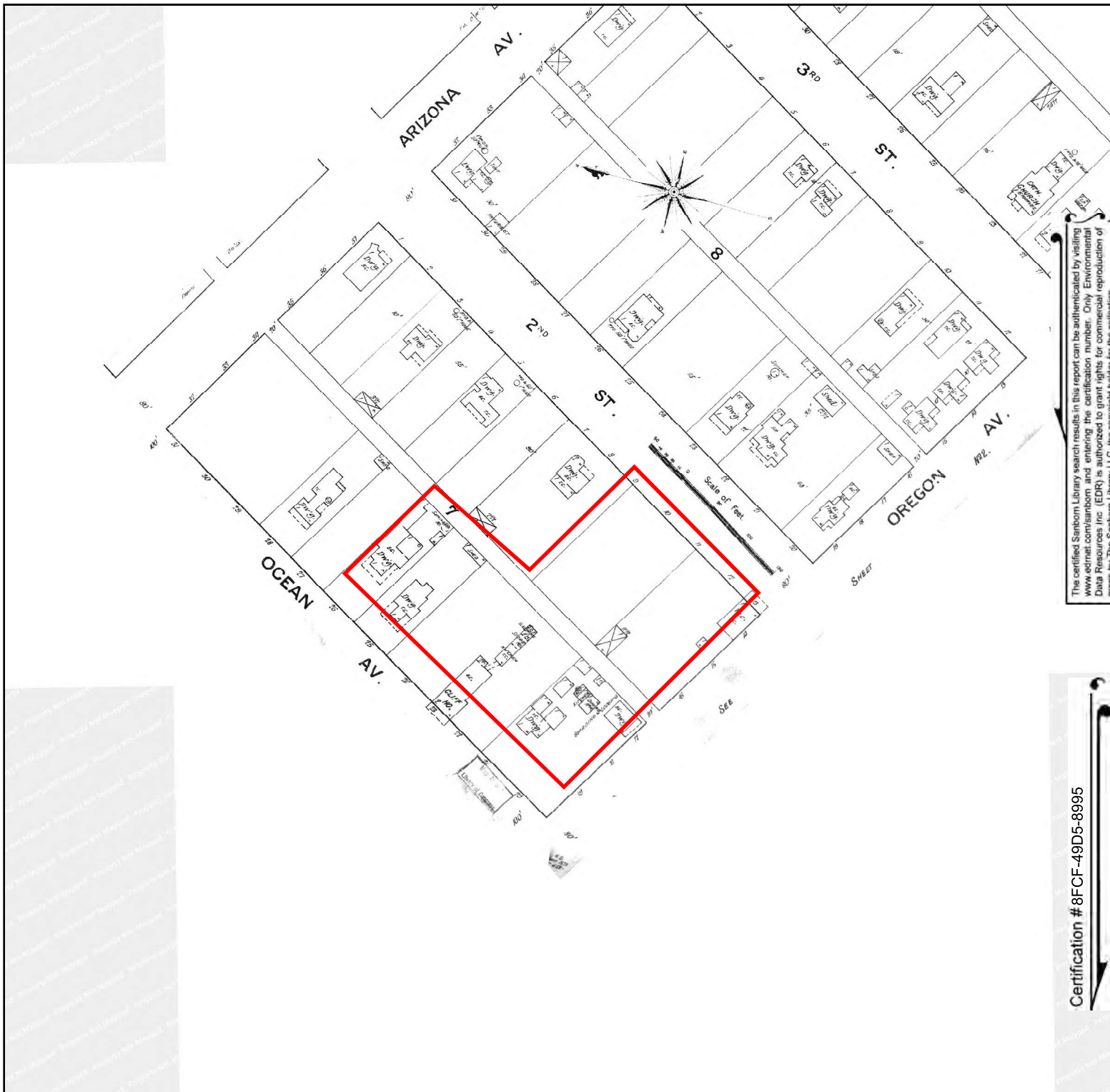
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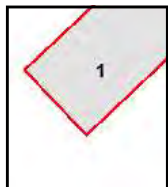
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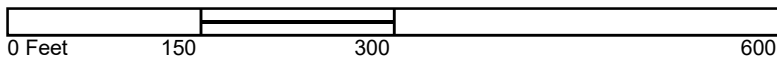
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