

# IV. Environmental Impact Analysis

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## D. Cultural Resources

### 1. Introduction

This section of the Draft EIR provides an analysis of the Project’s potential impacts to historical and archaeological resources. The analysis of historical resources is based on the Historic Resources Technical Study—Los Angeles County Metropolitan Transportation Authority Transportation Communication Network Program (Historic Report) prepared by HDR and included in Appendix E.<sup>1</sup>

### 2. Environmental Setting

#### a. Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, State, and local laws governing and influencing the preservation of cultural resources of national, State, regional, and local significance include:

- National Historic Preservation Act of 1966, as amended
- Secretary of the Interior’s Standards for the Treatment of Historic Properties
- Native American Graves Protection and Repatriation Act
- Archaeological Resources Protection Act
- Archaeological Data Preservation Act
- California Environmental Quality Act
- California Register of Historical Resources

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<sup>1</sup> HDR, *Historical Resources Technical Report—Los Angeles County Metropolitan Transportation Authority Transportation Communication Network Program, August, 2022.*

- California Health and Safety Code
- California Public Resources Code
- City of Los Angeles General Plan
- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3)
- City of Los Angeles Historical Resources Survey

### (1) Federal

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

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historical resources and to indicate what properties should be considered for protection from destruction or impairment.”<sup>2</sup> The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.<sup>3</sup>

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district

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<sup>2</sup> 36 Code of Federal Regulations (CFR) 60.

<sup>3</sup> U.S. Department of the Interior, National Park Service, *National Historic Landmarks, Frequently Asked Questions*, accessed May 26, 2022.

results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”<sup>4</sup>

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district’s significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.<sup>5</sup>

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

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

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

*(i) Criteria*

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of

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<sup>4</sup> U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 5.

<sup>5</sup> U.S. Department of the Interior, *National Register Bulletin #21: Defining Boundaries for National Register Properties Form*, 1997, p. 12.

Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.<sup>6</sup>

*(ii) Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific... property or site is understood and its meaning... is made clear.”<sup>7</sup> A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

*(iii) Integrity*

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance.”<sup>8</sup> The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess

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<sup>6</sup> U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997*, p. 8.

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

<sup>8</sup> U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997*, p. 44.

several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than state or local registers.

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

*(iv) Criteria Considerations*

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.<sup>9</sup> Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.<sup>10</sup> The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

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<sup>9</sup> U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 25.

<sup>10</sup> U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 41.

- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

*(b) Secretary of the Interior's Standards*

The National Park Service issued the Secretary of Interior's Standards for the Treatment of Historic Properties (Standards) with accompanying guidelines for four types of treatments for historical resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historical resources, Standards #9 and #10 of the Standards for Rehabilitation provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible,

materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.<sup>11</sup>

It is important to note that the Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every standard to achieve compliance.

*(c) Native American Graves Protection and Repatriation Act*

The Native American Graves Protection and Repatriation Act requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.<sup>12</sup>

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<sup>11</sup> U.S. Department of the Interior, National Park Service, *the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, 2017.

<sup>12</sup> U.S. Department of the Interior, National Park Service, *Archeology Program, Native American Graves Protection and Repatriation Act*.

*(d) Archaeological Resources Protection Act*

The Archaeological Resources Protection Act of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.<sup>13</sup>

*(e) Archaeological Data Preservation Act*

The Archaeological Data Preservation Act (ADPA) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

**(2) State**

*(a) California Environmental Quality Act*

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

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<sup>13</sup> U.S. Department of the Interior, National Park Service, *Technical Brief #20: Archeological Damage Assessment: Legal Basis and Methods*, 2007.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.<sup>14</sup> If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.<sup>15</sup>

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”<sup>16</sup> According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

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<sup>14</sup> *California Public Resources Code Section 21083.1(a).*

<sup>15</sup> *State CEQA Statute and Guidelines, Section 15064.5(c)(4).*

<sup>16</sup> *State CEQA Statute and Guidelines, Section 15064.5(b)(1).*

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.<sup>17</sup>

*(b) California Register of Historical Resources*

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."<sup>18</sup> The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.<sup>19</sup> Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;

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<sup>17</sup> *State CEQA Statute and Guidelines, Section 15064.5(b)(3).*

<sup>18</sup> *California Public Resources Code, Section 5024.1[a].*

<sup>19</sup> *California Public Resources Code, Section 5024.1[b].*

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

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

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by OHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

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

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

*(c) California Health and Safety Code*

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable

PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

*(d) California Public Resources Code (PRC)*

California Public Resources Code (PRC) Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

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### (3) Local

#### (a) *City of Los Angeles General Plan*

##### (i) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>20</sup>

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

##### (ii) *Community Plans*

As discussed in detail in Section IV.J, Land Use, of this Draft EIR, the Land Use Element of the City's General Plan includes 35 community plans. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, and many include goals and policies regarding the protection of historical resources. The Site Locations are located within the Central City, Central City North, Silver Lake–Echo Park–Elysian Valley, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass, North East Los Angeles, Boyle Heights, North Hollywood–Village Valley, Sun Valley–La Tuna Canyon, Arleta–Pacoima, Granada Hills–Knollwood, Sylmar, Encino–Tarzana West Los Angeles Community Plan, South Los Angeles, Southeast Los Angeles, Palms–Mar Vista–Del Rey, Westchester–Playa Del Rey, Van Nuys–North Sherman Oaks, West Adams–Baldwin Hills–Leimert, and Wilshire community plans.

<sup>20</sup> *City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.*

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

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The criteria for HCM designation are stated below:

- The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of with historic personages important to national, state, city, or local history; or
- The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.<sup>21</sup>

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and the Los Angeles Department of City Planning's Office of Historic Resources (OHR) staff often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a "master" architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?

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<sup>21</sup> *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

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

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”<sup>22</sup>

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

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zone (HPOZs) in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.<sup>23</sup> Each HPOZ is established with a Historical resources Survey, a

<sup>22</sup> *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

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

historic context statement, and a preservation plan. The Historical resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ, as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historical resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historical resources Survey.<sup>24</sup> For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historical resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

*(d) City of Los Angeles Historical resources Survey (SurveyLA)*

The City of Los Angeles Historical resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

The Los Angeles Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals

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<sup>24</sup> *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

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

*(e) Redevelopment Project Area Historical resources Surveys and Specific Plan Area Historical resources Surveys*

The Community Redevelopment Agency of the City of Los Angeles (CRA) was established in 1948 to revitalize economically underserved areas within the City of Los Angeles by increasing the supply of low income housing, providing infrastructure for commercial and industrial development, and creating employment opportunities.<sup>25</sup> To carry out these goals, CRA adopted comprehensive plans for each Redevelopment Project Area. The CRA was dissolved in February 2012, and administration of the Redevelopment Project Areas was initially transferred to the CRA/LA, a Designated Local Authority (DLA) and successor to the CRA. On September 30, 2019, the Los Angeles City Council voted to adopt Ordinance No. 186325 to effectuate the transfer of land use related plans and functions of the CRA/LA to the City of Los Angeles. As a result, the Department of City Planning has jurisdiction over review of properties located within Redevelopment Project Areas as of November 11, 2019.

Some Redevelopment Project Areas also include a historical resources survey that documents all of the historical resources—individual and districts—within the Redevelopment Project Area. These CRA and CRA/LA surveys were done independent of

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<sup>25</sup> *Community Redevelopment Agency of the City of Los Angeles, Who we Are, [www.crala.org/internet-site/About/who\\_we\\_are.cfm](http://www.crala.org/internet-site/About/who_we_are.cfm), accessed July 20, 2022.*

the City's SurveyLA effort, though some of the more recent surveys may have used the same methodology and technology that was used in SurveyLA. SurveyLA did not survey areas already surveyed by CRA or CRA/LA.

## **b. Existing Conditions**

### **(1) Historical Resources**

As discussed in the Historic Report, a Study Area that includes a 330-foot (100-meter) buffer around each of the 56 Site Locations was evaluated. A total of 19 historical resources were identified in the Study Area within 330 feet of 17 Site Locations. Of these 19 resources, six are listed in the National Register and California Register, six have been previously determined eligible for listing in either the National Register or California Register, and six have been previously recommended eligible for either the National Register or California Register. Additionally, six of these resources are, or have contributing elements that are, designated as State Registered Landmarks (SRL) or HCMs. A summary of the historical background and context as well as historic designations for each of these resources is provided below.

#### *(a) Los Angeles Union Station Passenger Terminal and Grounds*

##### *(i) Historical Background and Context*

Los Angeles Union Station (Union Station) is located at 800 Alameda Street and was built between 1934 and 1939, when railroad passenger service was on the decline. It was known as "The Grand Finale of the Golden Age of Railroads in America" because it was the last monumental-scale passenger terminal built in a major American city. The site was once part of the original Pueblo de Los Angeles, and the west half became part of the first Chinese community in the 1860s. In 1876, Southern Pacific built the first major rail line in Los Angeles along Alameda Street, where Union Station would later be constructed. By the early twentieth century, three railroads served Los Angeles, and passenger trains traveled down the middle of some of the City's busiest streets. As the automobile became more prevalent, the railroad corridors interfered with traffic and caused unsafe conditions. The completion of Union Station in 1939 was part of the solution to this problem by unifying the three separate railroads in the City.

##### *(ii) Historic Designations*

Union Station is listed in the National Register and California Register under Criteria A/1 and C/3 and was initially recorded and declared a City of Los Angeles HCM #101 on August 2, 1973. In 1978, Ruben Lovret of the Los Angeles City Planning Department nominated Union Station for the National Register and it was listed on November 13, 1980 (NR #80000811). Lovret described Union Station as having strong California Spanish

Colonial Influence with a blending of 1930s Art Deco and Streamline Moderne styles. As the station had not been subjected to any major remodeling efforts, it retained all aspects of historical integrity. Contributing elements of the resource include: the platforms, butterfly sheds and canopies, the railroad tracks, and a reconstructed retaining wall with luminaire lights just south of the stub end yard. Character-defining features include details associated with its California Spanish Colonial, Art Deco, and Streamline Modern architectural influences. Contributing components of the site include the landscape plan, rail platforms, butterfly sheds and canopies, tracks, and a retaining wall with luminaire lights.

Union Station's period of significance is 1939, corresponding to the year the station was completed. Although specific National Register eligibility criteria were not articulated in its nomination, the discussion of significance indicated Union Station met the conditions of National Register Criteria A for Community Planning and Transportation and Criteria C for Architecture.

*(b) Magellan Storage Building*

*(i) Historical Background and Context*

The Magellan Storage Building is located at 801 East Commercial Street and consists of three connected industrial buildings (the original volume and two additions) located at the northeast corner of the intersection of East Commercial Street and Center Street in the Central City North Community Plan Area. The original volume, a three-story brick structure designed by architect Robert Brown Young and built in 1902 for the Kahn-Beck Company, occupies the northwest corner of the resource boundary. In 1906, a one-story addition, also designed by Young, was built directly south of the original building. In 1941, a two-story warehouse addition, designed by architects Barker and Ott, was built directly east of the 1902 and 1906 buildings. Its character-defining features were not specifically identified in documentation, although they would likely be associated with its industrial use and location. Also note that the building has been impacted by a fire on the premises.

*(ii) Historic Designations*

The Magellan Storage Building was recommended eligible under Criterion A/1 for its association with the City's early industrial development. In 2016, Historical resources Group/SurveyLA evaluated the original building, although its construction date is listed as 1906 instead of 1902. The building was identified through SurveyLA as appearing eligible for the National Register, California Register, and for local listing or designation under the "Industrial Development, 1850–1980" context and "Early Industrial Development, 1880–1945" theme for its association with an early phase of industrial development in Los Angeles' primary industrial district (Criterion A/1). Its period of significance is 1902. The

2016 evaluation indicated the building represents an excellent and rare example of a 1902 industrial building in Los Angeles.

*(c) Van De Kamp's Holland Dutch Bakery*

*(i) Historical Background and Context*

Van De Kamp's Holland Dutch Bakery is located at 3016–3020 San Fernando Road and 2900–2930 Fletcher Drive and is a 2.5-story building designed by architect J. Edwin Hopkins, constructed in 1930 in the Glassell Park neighborhood of Los Angeles. It was designed to resemble a Dutch sixteenth-century farmhouse. From 1930 to 1990, the building served as the headquarters of the Van de Kamp chain of bakeries and coffee shops. The Bakery closed in 1990. In 2010, the building underwent a \$72-million renovation funded by the Los Angeles Community College District and was leased to a charter school. Its character-defining features include architectural details associated with its Renaissance Revival and Dutch Eclectic influence.

*(ii) Historic Designations*

Van De Kamp's Holland Dutch Bakery has been determined eligible for the California Register under Criteria 1 and 3 and was designated HCM #569 in 1992. In the HCM application, the Los Angeles Conservancy described it as the only extant example of an industrial plant in the Renaissance Revival and Dutch Colonial Revival styles in Los Angeles. The building was identified through SurveyLA as appearing eligible for local listing or designation in 2014 for "Architecture and Engineering, 1850–1980," "Mediterranean and Indigenous Revival Architecture, 1887–1952," and "Renaissance Revival, 1895–1935." Its period of significance is 1930 to 1990, when the factory ceased operations. Applicable criteria are not listed in the 2014 re-evaluation, but are likely 1 and 3: significant for its association with Van de Kamp's Bakery, a Los Angeles-based bakery and restaurant chain founded in 1915, and as an example of Renaissance Revival architecture with Dutch Eclectic influences.

*(d) Billingsley's Golden Bull*

*(i) Historical Background and Context*

Billingsley's Golden Bull, located at 11326 West Pico Boulevard in the West Los Angeles Community Plan Area, is a one-story commercial building constructed in 1947. The Billingsley's Golden Bull has operated at this location since its establishment. Its character-defining features were not specifically identified in documentation, although they would likely be associated with its use as a restaurant.

*(ii) Historic Designations*

Billingsley's Golden Bull was recommended eligible for local listing or designation under Criterion A/1 for Commerce. In 2015, the building was identified through SurveyLA as appearing eligible for local listing or designation within the "Commercial Development, 1850–1980" context and "Commercial Identity, 1850–1980" theme, and under Criterion 1 for its association with a business that has made important contributions to the commercial growth and development of the West Los Angeles neighborhood. Its period of significance is 1947. The resource was found to be significant as the original and long-term location of Billingsley's Restaurant, which has been in continuous operation at this location since its establishment in 1947.

*(e) 9190 Exposition Boulevard**(i) Historical Background and Context*

The industrial building located at 9190 Exposition Boulevard in the Palms–Mar Vista–Del Rey Community Plan area was constructed in 1932. Its character-defining features were not specifically identified in documentation, although they would likely be associated with its industrial use.

*(ii) Historic Designations*

In 2015, the building was identified through SurveyLA as appearing eligible for the California Register and for local listing or designation under the "Industrial Development, 1850–1980" context and "Early Industrial Development, 1880–1945" theme, and under Criterion A/1 for its association with an early phase of industrial development in the Palms neighborhood. Its period of significance is 1932.

*(f) Panama Street Industrial Historic District**(i) Historical Background and Context*

The Panama Street Industrial Historic District, located at 12820-12964 Panama Street, was documented and evaluated by Historical Resources Group/SurveyLA in 2015 as a triangular-shaped industrial site in the Palms–Mar Vista–Del Rey Community Plan Area. At the time, the Panama Street Industrial Historic District contained seven one-story light industrial buildings and several surface parking areas constructed between 1955 and 1960. Five of these buildings were assessed as contributing to the District. Buildings were characterized by flat roofs, stucco and brick exterior cladding, ribbons of steel-frame industrial windows, metal-frame storefront windows, and loading docks. District features included uniform front backs, lawns and shrubbery, and mature trees.

*(ii) Historic Designations*

The Panama Street Industrial Historic District was recommended eligible for National Register and California Register under Criterion A/1 and C/3. The Panama Street Industrial Historic District was documented and evaluated by Historical Resources Group/SurveyLA in 2015 and identified through SurveyLA as appearing eligible for the National Register, California Register, and for local listing or designation under the “Industrial Development, 1850–1980” context and “Industrial Design and Engineering, 1887–1965” theme (Criterion A/1), and under Criterion C/3 as an excellent and rare example of a 1950s office and light industrial complex in Del Rey. Its period of significance is 1955–1960. Between 2016 and 2018, all buildings within the District except the easternmost structure (12820 Panama Street, occupied by long-time tenant Teledyne Microelectronic Technologies) were demolished and replaced in 2019 with office buildings, a parking structure, and a charter school.

*(g) North Spring Street Bridge**(i) Historical Background and Context*

The North Spring Street Bridge (Viaduct) (Caltrans Bridge No. 53C0859) carries Spring Street over the Los Angeles River and railroad rights-of-way between Aurora Street and Avenue 18. The North Spring Street Bridge was constructed in 1928, and subsequently widened in 1939. In 1993, railing sections were repaired or replaced and electroliers were replaced in kind. Its character-defining features were identified as its relationship with the Los Angeles River, reinforced concrete construction, open spandrels, multiple spans, and Beaux Arts-inspired design details.

*(ii) Historic Designations*

The North Spring Street Bridge has been determined eligible for National Register and California Register listing under Criteria A/1 and C/3, and is designated HCM #900. The boundaries of the historic property are limited to the North Spring Street Bridge itself. The North Spring Street Bridge was determined significant at the local level under National Register Criterion A (Transportation) for its association with the bridge-building period in 1920s Los Angeles and Criterion C for Engineering. Its period of significance is 1928, coinciding with the completion of the North Spring Street Bridge. In 2008, the bridge was designated HCM #900. Although the bridge has undergone modifications, it was found to retain sufficient historical integrity to convey its significance.

*(j) Lankershim Depot*

*(i) Historical Background and Context*

The Lankershim Depot, 11275 West Chandler Boulevard, is a one-story frame building originally known as the Toluca Southern Pacific Train Depot. The depot was likely constructed when South Pacific first laid track through Toluca (North Hollywood) in 1896. It played a role in the area's early growth as part of Southern Pacific's conveyance of agricultural products and livestock to and from North Hollywood. In 1911, the depot was called into additional service as a station on the Pacific Electric Company line. The building has a gabled roof and partial open-shed construction with sawn bargeboards and brackets.

*(ii) Historic Designations*

In 1983, it was determined eligible for NRHP listing and listed in the CRHR; its significance was tied to the early growth and settlement of North Hollywood and it being one of the few surviving nineteenth century non-adobe structures in the Valley (Criteria A/1 and C/3). Its period of significance was identified as 1911–1952, when it served as a Pacific Electric depot. Its character-defining features include its platform, doors/windows, chimney, rooftop signage, canopy, telephone booth, exterior walls, landscaping, and interior floor plan.

*(i) United States Post Office North Hollywood*

*(i) Historical Background and Context*

The United States Post Office Building in North Hollywood is located at 11314 West Chandler Boulevard and is a one- and two-story masonry and stucco post office. It was designed by architect James A. Wetmore and built in 1933 in the Public Works Administration Moderne style with Spanish Colonial Revival influences. It exhibits formal symmetry and massing; smooth wall surfaces such as stucco, marble, terrazzo, and polished stone; and a stripped appearance with minimal ornamentation, including some zigzags, medallions, or plaster reliefs. Character-defining features include its PWA Modern details, Spanish Colonial Revival influence, and its standardized postal facility design.

*(ii) Historic Designations*

The United States Post Office in North Hollywood was recommended eligible for the National Register and California Register under criteria A/1 and C/3. In 2012, Architectural Resources Group/SurveyLA evaluated the building under several contexts and themes related to Public and Private Institutional Development, 1850–1980, and Architecture and Engineering, 1850–1980. It was identified through SurveyLA as appearing eligible for the National Register, California Register, and for local listing or designation under Criteria A/1 and C/3. The building was determined eligible under Criteria A/1 for its association with the

expanding population in the San Fernando Valley and the need for government services in the area. It was also determined eligible under Criteria C/3 as an excellent example of PWA Moderne architecture, with regional influence of the Spanish Colonial Revival style, and for retaining the distinctive features of the postal facility property type and buildings standards of the U.S. Postal Service at the time. Its period of significance is 1933, when construction was completed.

*(j) Site of Campo de Cahuenga*

*(i) Historical Background and Context*

The Site of Campo de Cahuenga is located at 3919 Lankershim Boulevard and was the site of the Don Tomás Feliz Adobe (also referred to as Casa de Cahuenga), located at the southern edge of the San Fernando Valley near the entrance to Cahuenga Pass. The Californios and Mexican Army led by General Andrés Pico surrendered to John Frémont at this site after the Battle of La Mesa on January 13, 1847, during a formal ceremony known as the Capitulation of Cahuenga. The six-room Feliz Adobe ranch house was built in 1844–1845 to replace an earlier Mission San Fernando adobe (ca. 1795), and it measured approximately 100 feet in length and 40 feet in width. Abandoned during the late nineteenth century, only a portion of the foundation remained by 1900. The City purchased the site in 1924 (lots 16 & 17 of the Universal Tract), and it was excavated in 1931/1932 by Fremont High School. The City converted it into a park and built a community center with a façade replicating the Feliz Adobe in 1940. The grounds were officially dedicated as Campo de Cahuenga, Fremont-Pico Memorial Park in 1950. Portions of original adobe tiles and foundation were encountered during construction monitoring in 1995, and subsequent excavations uncovered all but the northeast and southeast corners of the original building's footprint. Recovered artifacts included Native American pottery, two stone pestles, Chinese porcelain, and two kaolin pipes. Its character-defining features include Mission details, its landscape design, and the archaeological site and contributing components include stone foundations and floors, the community center, and landscaping.

*(ii) Historic Designations*

The Site of Campo de Cahuenga is listed on the National Register and California Register under Criteria A/1, C/3 and D/4 and was designated SRL #151 in 1940. Although nominated, the site was rejected for National Register listing in 1974. The site's National Register nomination was updated in 2003 under Criteria A for Social History and Conservation, C for Architecture, and D for Historic Archaeology (aboriginal/non-aboriginal) as a commemorative property and district, and approved the same year (NR #72001602). Its periods of significance as a multi-component archaeological site range from 1795 to the 1880s and as a historic building from 1923 to 1953. The archaeological site, which is designated as CA-LAN-1945H (contributing element), consists of the original Mission San Fernando Adobe stone foundations and tile floors built in 1795. The community center

building (contributing element), which was completed in 1942, was designed as a Spanish Colonial Revival-style reconstruction of the original adobe based on the 1931–1932 excavations. The landscape design is also a contributing element to the site. It was initially designed in 1927 by the Los Angeles Department of Parks and updated by the City Department of Parks and Recreation in 1949.

*(k) Broadway Theater and Commercial District*

*(i) Historical Background and Context*

The Broadway Theater and Commercial District is located at 300–849 South Broadway. The six-block thoroughfare is associated with Los Angeles commerce and theater from the early 1890s to the early 1930s. At the time of its nomination in 1979, the district had 63 contributing and 36 non-contributing buildings. At the time of its boundary increase in 2002, when six contributing and two non-contributing buildings were added, the resource count totaled 54 contributing buildings and 36 non-contributing buildings. Prior to the 1890s, the commercial center of Los Angeles was centered on First and Spring Streets and the District consisted primarily of residential property. During the 1880s, a new city hall building was installed on Broadway between Second and Third Streets, which facilitated the expansion of commercial enterprise to the south during the following decade. By the turn of the twentieth century, several large commercial buildings were present: the Bradbury Building (1893); the Grand Central Market (1897), a contributing resource within the Study Area at 315 South Broadway; the Nelson Building (1897), a contributing element within the Study Area at 355 South Broadway; and several smaller blocks, the O.T. Johnson Block (1895), the Hubert–Thom McAn Building (1900), and the Jacoby Brothers store (1900). Other buildings contributing to the significance of the District within the Study Area include Karl’s (1903) at 341–45 South Broadway and the Broadway Mart Center (1913) at 401–23 South Broadway (Sitton 1977). The boundary increase added buildings in the 200 and 900 blocks of South Broadway. Character-defining features of the District include architectural details associated with Classical, Commercial, Beaux Arts, Art Deco, and Moderne architectural styles.

*(ii) Historic Designations*

The Broadway Theater and Commercial District is listed in the National Register and California Register under Criteria A/1 and C/3. The district was listed in the National Register in 1979 (NR #79000484) and expanded via a boundary increase in 2002 (NR #02000330) under Criterion A for Commerce and Theater, and under Criterion C for Architecture.

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(l) *Subway Terminal Building*

(i) *Historical Background and Context*

The Subway Terminal Building is located at 415–425 South Hill Street and 416–424 South Olive Street. The Italian Renaissance Revival-style building, constructed in 1925, is 12 stories with a two-story mechanical penthouse and two subterranean levels. In 2005, a renovation was completed in accordance with the Secretary of Interior Standards, which converted a large portion of the building to house 277 residential units known as Metro 417. Besides the building's exterior, primary and secondary lobbies, and upper-floor corridors, most other areas and features have been altered over time. Its character-defining features include the building's association with transportation infrastructure and its Italian Renaissance Revival architectural details.

(ii) *Historic Designations*

The Subway Terminal Building is listed in the National Register and California Register under Criteria A/1 and C/3. The property was listed in the National Register in 2006 (NR #06000657) and was determined significant at the local level under Criterion A (Transportation) for its association with the Pacific Electric Interurban Railway and under Criterion C for Architecture. Its period of significance is 1925–1955.

(m) *Angels Flight Railway*

(i) *Historical Background and Context*

The Angels Flight Railway is located at 351 South Hill Street and includes an incline railway on the eastern slope of Bunker Hill, a Beaux Arts wood and cast stone station house, a Beaux Arts cast stone archway for boarding, and two wooden cars. The Angels Flight Railway was constructed in 1901 and originally located along the south side of the Third Street tunnel before being dismantled in 1969 to make way for the Angelus Plaza Senior Citizens Housing Project. In 1995, the Angels Flight Railway was restored and installed at its present location, 300 feet south of the original location. The original station house, 1910 archway, and original cars were restored while the tracks and trestles were replicated with modern materials. Original sign boards reading "Angels Flight" are extant. Character-defining features include its Beaux Arts details and transportation-related components.

(ii) *Historic Designations*

The Angels Flight Railway is listed in the National Register and California Register under Criteria A/1 and C/3. The resource was listed in the National Register in 2000 (NR #00001168) and was determined significant at the local level under Criterion A for

Transportation and under Criterion C for Architecture and Engineering. The resource is an HCM (#4) and its period of significance is 1905–1945.

*(n) Batson's Fine Laundering and Dry Cleaning*

*(i) Historical Background and Context*

Batson's Fine Laundering and Dry Cleaning, 6732 South Crenshaw Boulevard, consists of a one-story brick and stucco commercial building built in 1941 in the West Adams–Baldwin Hills–Leimert Community Plan Area. Batson's Laundry was in continuous operation at this location from 1941 through 2015. Its character-defining features were not specifically identified in documentation, although they would likely be associated with its commercial use and location.

*(ii) Historic Designations*

Batson's Fine Laundering and Dry Cleaning was recommended eligible for local listing or designation under Criterion A/1 for Commerce. In 2015, the building was identified by Historic Resources Group/SurveyLA as appearing eligible for local listing or designation within the "Commercial Development, 1850–1980" context and "Commercial Identity, 1850–1980" theme, and under Criterion A/1 for its association with a business that has made important contributions to the commercial growth and development of its neighborhood. The resource was found significant as the original and long-term location of Batson's Laundry. Its period of significance is 1941.

*(o) Macy Street School*

*(i) Historical Background and Context*

Macy Street School is located at 900 North Avila Street (with an alternate address of 505 Clara Street). It was constructed in 1915 and designed in the English Renaissance Revival style by noted Los Angeles architect Albert C. Martin. Character-defining features include its use and its English Renaissance Revival details.

*(ii) Historic Designations*

Macy Street School has been recommended eligible for the National Register and California Register under Criteria A/1 and B/2. ICF International recommended the building eligible for the National Register in 2016 as significant at the local level under Criterion A for Education and Ethnic Heritage and Criterion B for its association with progressive educator Nora Sterry. Its period of significance is 1915–1930, coinciding with Sterry's tenure as principal. The School is not a state landmark or HCM.

*(p) Little Tokyo Historic District*

*(i) Historical Background and Context*

The Little Tokyo Historic District is located at 301–349 East First Street, 110–120 San Pedro Street, and 119 Central Avenue. The Little Tokyo Historic District consists of 13 buildings (9 contributing, 4 non-contributing resources) along First and Judge John Aiso Streets with the most significant being the former Nishi (Hompa) Hongwanji Buddhist Temple (contributing resource, within the Study Area [HCM #313]). The Temple was built in 1925 and operated as a religious facility until it was sold in 1969. The three-story building was designed in the eclectic style by Edgar Cline with three architecturally and historically distinct sections. In 1992, the building reopened as the Japanese-American National Museum and Interpretive Center. Adjacent to the Hompa Hongwanji Buddhist Temple along First Street is a three-story Art Deco commercial building (447–353 East First Street), contributing resource, within the Study Area). It currently houses the Far East Lounge. It was built in 1911 and remodeled in 1935. Adjoining the northwest side of this building along First Street is another commercial building (341–345 East First Street, contributing resource, within the Study Area), constructed in 1905. The building currently houses two eateries and a clothing store. Contributing resources outside of the Study Area include buildings constructed between 1905–1933.

*(ii) Historic Designations*

The Little Tokyo Historic District is listed in the National Register and California Register under Criterion A/1 and one contributing resource in the Study Area (the Hompa Hongwanji Buddhist Temple) is designated HCM #313. The district was listed in the National Register in 1986 (NR #86001479, revised 1993) and was also granted National Historic Landmark status in 1995 under Criterion A for Ethnic Heritage, as the only significant pre–World War II remnant of the largest Japanese community in the United States at the time. Its period of significance is 1905–1942.

*(q) Japanese Village Plaza*

*(i) Historical Background and Context*

The Japanese Village Plaza, located at 1st Street and Central Avenue in the Central City Community Plan Area, is a 2.5-acre Japanese-themed commercial center constructed in 1978. The entrance to the plaza on 1st Street is marked by the iconic Yagura Fire Tower, designed to resemble a traditional fire lookout in rural Japan. The 55-foot-tall tower features bright red beams and an ornamented roof with tiles imported from Japan. Due to termite damage, the original wood tower was replaced with a metal replica in 2010. The Plaza property consists of four adjoining commercial buildings ranging in height between one and two stories and occupied by small retail stores and eateries. It is transected by a pedestrian promenade that extends between First and Second Streets. Plaza buildings

exhibit some characteristics of the East Asian Eclectic style. Notable features include complex roof forms and blue clay tile roof cladding, ornamented roof ridges, decorative wood screens, and other Japanese-inspired motifs.

*(ii) Historic Designations*

Japanese Village Plaza has been recommended eligible for local listing or designation under Criterion A/1. While the resource was determined ineligible for the National Register and California Register in 2009, it was identified through SurveyLA as appearing eligible in 2016 for local listing or designation under the “Commercial Development, 1850–1980” context and “Commercial Identity, 1850–1980” theme, and under Criterion A/1 for its association with a long-term location of a retail complex important to the commercial identity of Little Tokyo. Since its construction, the complex has served as a focal point of Japanese American cultural and community identity in Los Angeles. Its period of significance begins in 1978, when the complex was constructed, and has been left open-ended since the complex has remained in continuous operation.

*(r) Nicholas Priester Building*

*(i) Historical Background and Context*

The Nicholas Priester Building, located at 1109 North Vermont Avenue, is a two-story masonry building designed by Weston and Weston Architects, constructed in 1924 and executed in the Renaissance Revival style. Its character-defining features include its Renaissance Revival architectural details and commercial and transportation-related origins.

*(ii) Historic Designations*

The Nicholas Priester Building was determined individually eligible for the National Register by consensus through the Section 106 process in 1988. In 2015, it was identified through SurveyLA as appearing eligible for the National Register, California Register, and for local listing or designation under Criteria A/1 and C/3 under the “Commercial Development, 1850–1980” context and “Streetcar Commercial Development, 1873–1934” theme. Its period of significance is 1924.

*(s) Fourth Street Bridge*

*(i) Historical Background and Context*

The Fourth Street Bridge (Caltrans Bridge No. 53C0044) spans the Los Angeles River from Mission Road on the east to Santa Fe Avenue on the west. It was constructed in 1930–1931 and its design was influenced by both the Beaux Arts and Gothic Revival architectural styles. Character-defining features of the Fourth Street Bridge include its

fixed-hinge arch spans set atop 40-foot pylons. It was the first viaduct in the United States to use the fixed-hinge design and cast aluminum lanterns.

### *(ii) Historic Designations*

The Fourth Street Bridge has been determined eligible for National Register and California Register listing under Criterion C/3, and was designated HCM #906 in 2008. It was first recorded and recommended eligible for the National Register in 1982 by the U.S. Department of Transportation, and again in 1986 by Caltrans. As a result of the 1986 recommendation, the Fourth Street Bridge was determined eligible for the National Register by consensus. Additional evaluations were completed by Myra Frank & Associates in 1994 and ICF International in 2016. The Fourth Street Bridge has been determined significant at the local level under National Register Criterion C for Engineering, and its period of significance is 1930–1931, coinciding with its construction.

## (2) Archaeological Resources

A records search of the California Historical Resources Information System (CHRIS) was conducted by SWCA staff at the South Central Coastal Information Center (SCCIC) at California State University Fullerton on August 18, 2022, for the Site Locations and a surrounding 0.25-mile radius. In addition to the CHRIS search conducted by the SCCIC, SWCA also reviewed archival CHRIS data already on file for several of the Project locations.

### *(a) Prehistoric Overview*

Archaeology is the recovery and study of material evidence of human life and culture of past ages. Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. In general terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

### *(b) Historic Period Overview*

The written history of the State of California is generally divided into three periods: the Spanish Period (1769–1821), Mexican Period (1821–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego

de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, signals the beginning of the American Period when California became a territory of the United States.

*(c) Site of Camp De Cahuenga*

As previously discussed as a historic resource, the Site of Campo de Cahuenga is located at 3919 Lankershim Boulevard and was the site of the Don Tomás Feliz Adobe (also referred to as Casa de Cahuenga), located at the southern edge of the San Fernando Valley near the entrance to Cahuenga Pass. Portions of original adobe tiles and foundation were encountered during construction monitoring in 1995, and subsequent excavations uncovered all but the northeast and southeast corners of the original building's footprint. Recovered artifacts included Native American pottery, two stone pestles, Chinese porcelain, and two kaolin pipes.

The Site of Campo de Cahuenga is listed on the National Register and California Register under Criteria A/1 for Social History and Conservation, C/3 for Architecture, and D/4 for Historic Archaeology (aboriginal/non-aboriginal) as a commemorative property and district. The archaeological site, which is designated as CA-LAN-1945H (contributing element), consists of the original Mission San Fernando Adobe stone foundations and tile floors built in 1795.

*(d) LAN-4660H*

LAN-4660H is a historic period archaeological site that consists of paving stone, two sets of narrow-gauge streetcar tracks, and a railroad spike that were recovered during utility excavation along Macy Street. The tracks were preserved directly beneath the surface asphalt and in the center of the street. The paving stones were recovered from different locations between 8 and 10 feet below the existing grade and had been dislocated from their original location as part of a former street surface. Several railways have been constructed along Macy Street, the first of which was built in 1897 as part of the Los Angeles Railway Company, which was eventually absorbed into the Pacific Electric (Red Car) network. Versions of the streetcar system remained in use until 1963.

*(e) Additional Nineteenth and Twentieth Century Sites*

As included as part of the CHRIS records search the following additional historic sites were identified: LAN-2394H includes a historic-era trash filled trench and a truncated round, red brick-lined well identified under approximately 21 feet and seven inches of fill soil associated with site LAN-1945H; LAN-2394H includes three historic-era artifact concentrations with ceramics, glass bottles, cutlery, dishes, bowls, cups, wash basins, pots, pans, horseshoes, etc.; LAN-3303H includes a large domestic trash dump site

identified 25 feet below the surface and most likely buried by flooding of the Los Angeles River in 1938. LAN-3304H includes a large trash pit composed of automobile parts and newspapers. Lastly, LAN-3305H includes a domestic trash dump site associated with multi-family condominiums consisting of glass bottles, ceramics, Melmac, metal, bones, shell, and other domestic refuse.

*(f) Geologic Materials*

The Site Locations are mapped as being underlain by a variety of geologic materials. All Site Locations are anticipated to include a limited amount of fill materials, underlain by native alluvial soils. Depending on the Site Location, the native alluvial soils are anticipated to consist of a mixture of sand and silt or sand, silt, and clay. Additionally, at several Site Locations, marine sediments or bedrock may be encountered underlying the alluvial soils at various depths. The type of bedrock that may be encountered varies with the Site Location and includes the Upper Miocene Puente Formation, the Upper Topanga Formation; and the Fernando Formation. Refer to Section IV.F, Geology, for a detailed discussion of the geologic materials underlying each Site Location.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to cultural resources if it would:

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

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

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

For this analysis, the Appendix G Thresholds listed above are relied upon.

#### b. Methodology

The Historic Report was prepared to assess potential impacts to known significant historical resources. The Study Area was defined as a 100 meter (330 feet) buffer from all Site Locations, as determined for the Historic Report by topography, vegetation, and viewing distance, including areas visible from the Project and public viewpoints that offer unobstructed views of the TCN Structures within their proposed urban setting. No buildings

or structures are within the immediate footprint of the Site Locations. As such, no historic resources would be subject to physical impact. Therefore, the Study Area is for the assessment of potential visual impacts to historical resources only. A review of publicly available sources of information—including the National Register of Historic Places, Los Angeles Historic-Cultural Monument List, and Los Angeles Historical Resources Survey—was carried out to identify previously recorded historical resources within the Study Area. The objective of the review was to identify known significant historical resources within the Study Area of the Site Locations. Data included National Register nomination forms, available site records and reports, and online resources such as the website for the Los Angeles Conservancy. The Site Locations that were found to have resources within 100 meters were described in the Historic Report as Sensitive Locations. Site visits were also conducted at the Study Area of the Sensitive Locations on June 10, 13, and 23, 2022, where HDR cultural resource personnel visited the previously recorded historical resources identified in the desktop review to document current conditions and carry out photographic documentation in support of the assessment of Project impacts on the previously recorded historical resources in the Study Area.

- Furthermore, while the Project poses no physical impact to historic resources, change in visual setting was investigated as a Project impact with the capacity to diminish a historic resource's integrity of setting, thus potentially impeding its ability to convey its significance and affecting its eligibility for local, state, or national designation. Features of each historic resource and aspects of its setting when assessing potential visual impact included:
- Applicable criterion/criteria for significance (i.e., importance of setting to significance)
- Character-defining features of resource and contributing components, if applicable
- Historic and current function of resource
- Scale of signage in relation to resource
- Orientation of resource in relation to signage
- Location of signage in relation to resource (e.g., potential for impeded view from/toward resource)
- Distance between signage and resource
- Integrity of existing setting (e.g., presence of vertical structures and/or modern structures)
- Additional setting considerations (e.g., vegetative screening, existing signage)

## c. Project Design Features

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

## d. Analysis of Project Impacts

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

### (1) Impact Analysis

As discussed in the Historic Report and shown in Table IV.D-1 on page IV.D-35 and on Figure IV.D-1 on page IV.D-36, 17 of the 56 Site Locations of the Project would be located within 100 meters (330 feet) of a known historical resource. As such, these Site Locations are described as Sensitive Locations in the Historic Report and in Figure IV.D-1. As previously discussed, 19 historical resources were identified in the Study Area. Two Site Locations (NFF-6 and NFF-16) have more than one associated historical resource within the Study Area, and two resources (Billingsley's Golden Bull and the Site of Campo de Cahuenga) are associated with more than Site Location, as shown in Table IV.D-1.

A summary the Project's potential impacts on the resources is provided in Table IV.D-2 on page IV.D-37. Additional discussion regarding the Project's potential to impact these 19 historical resources is provided in the discussion below.

#### *(a) Los Angeles Union Station Passenger Terminal and Grounds*

The Project is not anticipated to result in a physical impact to Union Station. Site Location FF-1 is approximately 60 feet west of the south end of the rail tracks and is physically separated from the rail yard by the L Line light rail tracks. The primary entrance to the terminal building is on the west elevation, away from proposed signage. Traffic traveling in either direction on US-101 has no view of the station or the rail yard as they are below street grade. Vehicular and pedestrian traffic on North Alameda Street and the El Monte Busway would not have impeded views of the station or the rail yard because intervening buildings, the tallest of which includes 13 stories, are present. Thus, a TCN Structure at Site Location FF-1 would not impede primary views of the resource from street level or the highway.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting, but to an extent temporary and/or minor. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible certain locations on the property, and would introduce a new visual element to the setting,

**Table IV.D-1  
Historical Resources Identified in the Study Area Per Site Location**

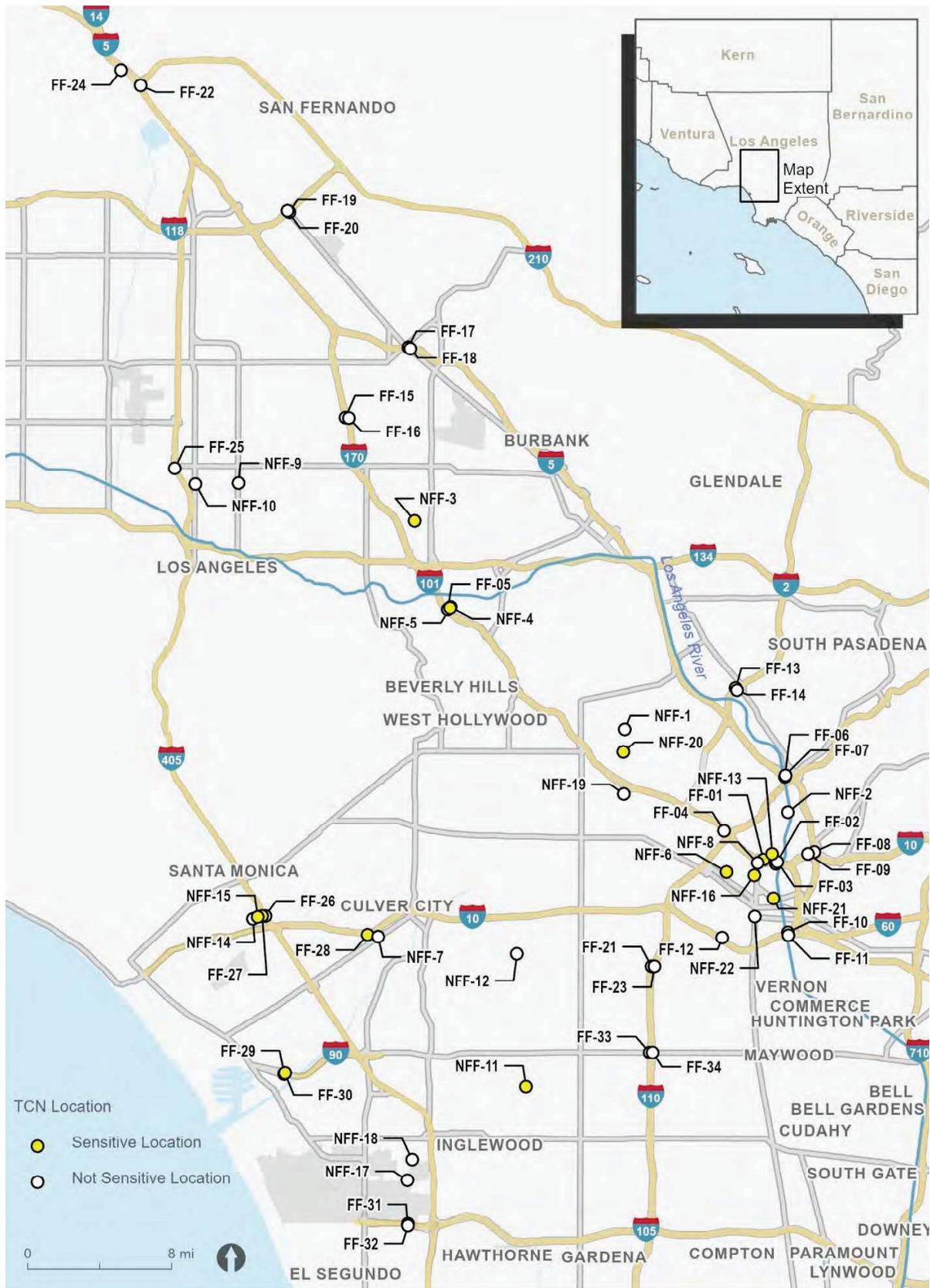
<b>Site Location</b>	<b>Historical Resources in Study Area</b>
FF-1	Los Angeles Union Station Passenger Terminal and Grounds
FF-2	Magellan Storage
FF-13	Van De Kamp's Holland Dutch Bakery
FF-27	Billingsley's Golden Bull
FF-28	9190 Exposition Blvd.
FF-30	Panama Street Industrial Historic District
NFF-2	North Spring Street Bridge, No. 53C0859
NFF-3	Lankershim Depot; United States Post Office North Hollywood
NFF-4	Site of Campo de Cahuenga
NFF-5	Site of Campo de Cahuenga
NFF-6	Broadway Theater and Commercial District; Subway Terminal Building; Angels Flight Railway
NFF-11	Batson's Fine Laundering and Dry Cleaning
NFF-13	Macy Street School
NFF-15	Billingsley's Golden Bull
NFF-16	Little Tokyo Historic District; Japanese Village Plaza
NFF-20	Nicholas Priester Building
NFF-21	Fourth Street Bridge, No. 53C0044
<hr/> <i>Source: HDR, Inc., August 2022.</i>	

the building's significance under Criteria A/1 and C/3 is not dependent on its setting, beyond its rail association, which remains intact.

The Project would not impact the character-defining features of Union Station. Union Station's integrity of location, design, materials, workmanship, and association would be unchanged. Its integrity of setting and feeling may be impacted by the Project, but not to a degree that the resource would be unable to convey its significance. **As such, a TCN Structure at Site Location FF-1 would not cause a substantial adverse change in the historical significance of Union Station, and impacts to this resource as a result of the Project would be less than significant.**

*(b) Magellan Storage Building*

The Project is not anticipated to result in a physical impact to Magellan Storage Building. Site Location FF-2 is approximately 60 feet from this resource, nearest the north and east elevations of the 1941 two-story addition. The building has pedestrian entries at



**Figure IV.D-1**  
 Site Locations Within 100 Meters of a  
 Historical Resource

Source: HDR, Inc., 2022.

**Table IV.D-2  
Historical Resources in the Study Area, Significance Status, and Impact Assessment for Historic Architecture**

<b>Resource</b>	<b>Address</b>	<b>Year Built</b>	<b>Status<sup>a</sup></b>	<b>Site Location</b>	<b>Impact Assessment</b>
Los Angeles Union Station Passenger Terminal and Grounds	800 N. Alameda St.	1939	Listed: NRHP & CRHR, Criteria A/1 & C/3 NR #80000811, Los Angeles HCM #101	FF-1	Less than significant
Magellan Storage Building	801 E. Commercial St.	1902	Eligible: NRHP & CRHR, Criterion A/1	FF-2	Less than significant
Van De Kamp's Holland Dutch Bakery	3016–3020 San Fernando Rd.; 2900–2930 Fletcher Dr.	1930	Eligible: CRHR, Criteria 1 & 3 Los Angeles HCM #569	FF-13	Less than significant
Billingsley's Golden Bull	11326 W. Pico Blvd.	1947	Recommended eligible: local designation, Criterion A/1	FF-27, NFF-15	Less than significant
9190 Exposition Blvd.	9190 Exposition Blvd.	1932	Recommended eligible: NRHP & CRHR, Criterion A/1	FF-28	Less than significant
Panama Street Industrial Historic District	12820–12964 Panama St.	1955–1960	Recommended eligible: NRHP & CRHR, Criterion C/3	FF-30	No impact
<b>North Spring Street Bridge, Caltrans Bridge No. 53C0859</b>	<b>N. Spring St. between Aurora St. and Ave. 18</b>	<b>1928</b>	<b>Eligible: NRHP &amp; CRHR, Criteria A/1 &amp; C/3, Los Angeles HCM #900</b>	<b>NFF-2</b>	<b>Potentially significant</b>
<b>Lankershim Depot</b>	<b>11275 West Chandler Blvd.</b>	<b>1896</b>	<b>Eligible: NRHP &amp; CRHR, Criteria A/1 &amp; C/3</b>	<b>NFF-3</b>	<b>Potentially significant</b>
United States Post Office North Hollywood	11314 W. Chandler Blvd.	1933	Recommended eligible: NRHP & CRHR, Criteria A/1 & C/3	NFF-3	Less than significant
Site of Campo de Cahuenga	3919 Lankershim Blvd.	1844–1845; 1927; 1942	Listed: NRHP & CRHR, Criteria A/1, C/3, & D/4 NR #72001602 SRL #151, HCM #29	NFF-4, NFF-5	Less than significant
Broadway Theater and Commercial District	200-947 S. Broadway	1893–1913	Listed: NRHP & CRHR, Criteria A/1 & C/3 NR #79000484, NR #02000330	NFF-6	Less than significant
Subway Terminal Building	415–425 S. Hill St.; 416–424 S. Olive St.	1925	Listed: NRHP & CRHR, Criteria A/1 & C/3 NR #06000657	NFF-6	Less than significant
Angels Flight Railway	351 S. Hill St.	1901	Listed: NRHP & CRHR, Criteria A/1 & C/3 NR #00001168, HCM #4	NFF-6	Less than significant

**Table IV.D-2 (Continued)**  
**Historical Resources in the Study Area, Significance Status, and Impact Assessment for Historic Architecture**

<b>Resource</b>	<b>Address</b>	<b>Year Built</b>	<b>Status<sup>a</sup></b>	<b>Site Location</b>	<b>Impact Assessment</b>
Batson's Fine Laundering and Dry Cleaning	6732 S. Crenshaw Blvd.	1941	Recommended eligible: local designation, Criterion A/1	NFF-11	Less than significant
Macy Street School	900 N. Avila St.	1915	Eligible: NRHP & CRHR, Criteria A/1 & B/2	NFF-13	Less than significant
<b>Japanese Village Plaza</b>	<b>1st St. and Central Ave.</b>	<b>1978</b>	<b>Recommended eligible: local designation, Criterion A/1</b>	<b>NFF-16</b>	<b>Potentially significant</b>
<b>Little Tokyo Historic District</b>	<b>301–349 East First St.; 110–120 San Pedro St.; 119 Central Ave.</b>	<b>1905–1942</b>	<b>Listed: NRHP &amp; CRHR, Criteria A/1 NR #86001479 1 resource: Los Angeles HCM #313</b>	<b>NFF-16</b>	<b>Potentially significant</b>
Nicholas Priester Building	1109 N. Vermont Ave.	1924	Eligible: NRHP & CRHR, Criteria A/1 & C/3	NFF-20	Less than significant
<b>Fourth Street Bridge, Caltrans Bridge No. 53C0044</b>	<b>Fourth St. between Mission Rd. and Santa Fe Ave.</b>	<b>1930–1931</b>	<b>Eligible: NRHP &amp; CRHR, Criterion C/3 Los Angeles HCM #906</b>	<b>NFF-21</b>	<b>Potentially significant</b>

<sup>a</sup> Resources listed in the NRHP under Criteria (A, B, C, D) are also listed in the CRHR under the equivalent Criteria (1, 2, 3, 4).

Source: HDR, Inc., August 2022.

its west and south elevations, and US-101 traffic passing west to east (closest to the resource) would have no impeded views and traffic passing east to west would have a partially impeded view of the third story of the rear of the building. Thus, a TCN Structure at Site Location FF-2 would not impede primary views of the resource from street level or the highway.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from certain locations on the property, and would introduce a new visual element to its setting, the building's significance under Criterion A/1 is not dependent on its setting, beyond its location within an industrial area (that has been subject to major infill and clearance). The Project also would not impact the character-defining features of the building. The resource's integrity of location, design, materials, workmanship, and association would be unchanged. Its integrity of setting and feeling may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, a TCN Structure at Site Location FF-2 would not cause a substantial adverse change in the historical significance of Magellan Storage Building, and impacts to this resource as a result of the Project would be less than significant.**

*(c) Van De Kamp's Holland Dutch Bakery*

The Project is not anticipated to result in a physical impact to Van De Kamp's Holland Dutch Bakery. Site Location FF-13 is approximately 260 feet from the Bakery, nearest its rear (southwest and southeast) elevations. A two-story building constructed in 2009 stands between the resource and the Project. Highway traffic passing the rear of the building would have momentary and partially impeded views of the resource, due to the presence of a vegetative buffer along the highway. Thus, a TCN Structure at Site Location FF-13 would not impede primary views of the resource from street level or the highway.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project may be visible from certain locations on the property, and would introduce a new visual element to its setting, the building's significance under Criteria 1 and 3 is not dependent on its setting. The Project would not impact the character-defining features of the building (its commercial origins and its Dutch-influenced, Renaissance Revival architectural details). Its integrity of location, design, materials, workmanship, feeling, and association would be unchanged.

The resource's integrity of setting may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, a TCN Structure at Site Location FF-13 would not cause a substantial adverse change in the historical significance of Van De Kamp's Holland Dutch Bakery, and impacts to this resource as a result of the Project would be less than significant.**

*(d) Billingsley's Golden Bull*

The Project is not anticipated to result in a physical impact to Billingsley's Golden Bull. The building is approximately 320 feet west of Site Location FF-27 and 160 feet east of Site Location NFF-15. The building faces northwest, away from FF-27 signage and adjacent to NFF signage. Given their distance from the building, the TCN Structures at Site Locations FF-27 and NFF-15 would not impede primary views of either the resource or its associated signage. Interstate 405 views are limited due to the building's distance from the highway, existing signage in the vicinity, and the resource's one-story height.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from the building, would introduce two new visual elements to its setting, the building's significance under Criterion A/1 is not dependent on its setting, which is already subject to modern infill. The Project would not impact the character-defining features of the building (its commercial function and property type). The resource's integrity of location, design, materials, workmanship, feeling, and association would be unchanged. Its integrity of setting may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, TCN Structures at Site Locations FF-27 and NFF-15 would not cause a substantial adverse change in the historical significance of Billingsley's Golden Bull, and impacts to this resource as a result of the Project would be less than significant.**

*(e) 9190 Exposition Boulevard*

The Project is not anticipated to result in a physical impact to 9190 Exposition Boulevard. Site Location FF-28 is approximately 190 feet northwest of the building, separated by Exposition Boulevard and a two-track rail corridor. The building has pedestrian entries at its northwest elevation (towards signage), but its original facade is its northeast elevation. A TCN Structure at Site Location FF-28 would not impede views of the resource from street level, and due to the highway's elevation in this location, highway traffic has no view of the resource.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from the current main entrance of the building, and would introduce a new visual element to its setting, the building's significance under Criterion 1 is not dependent on its setting. The Project would not impact the character-defining features of the building (associated with its industrial use in the Palms neighborhood). The resource's integrity of location, design, materials, workmanship, feeling, and association would be unchanged. Its integrity of setting may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, a TCN Structure at Site Location FF-28 would not cause a substantial adverse change in the historical significance of the 9190 Exposition Boulevard building, and impacts to this resource as a result of the Project would be less than significant.**

*(f) Panama Street Industrial Historic District*

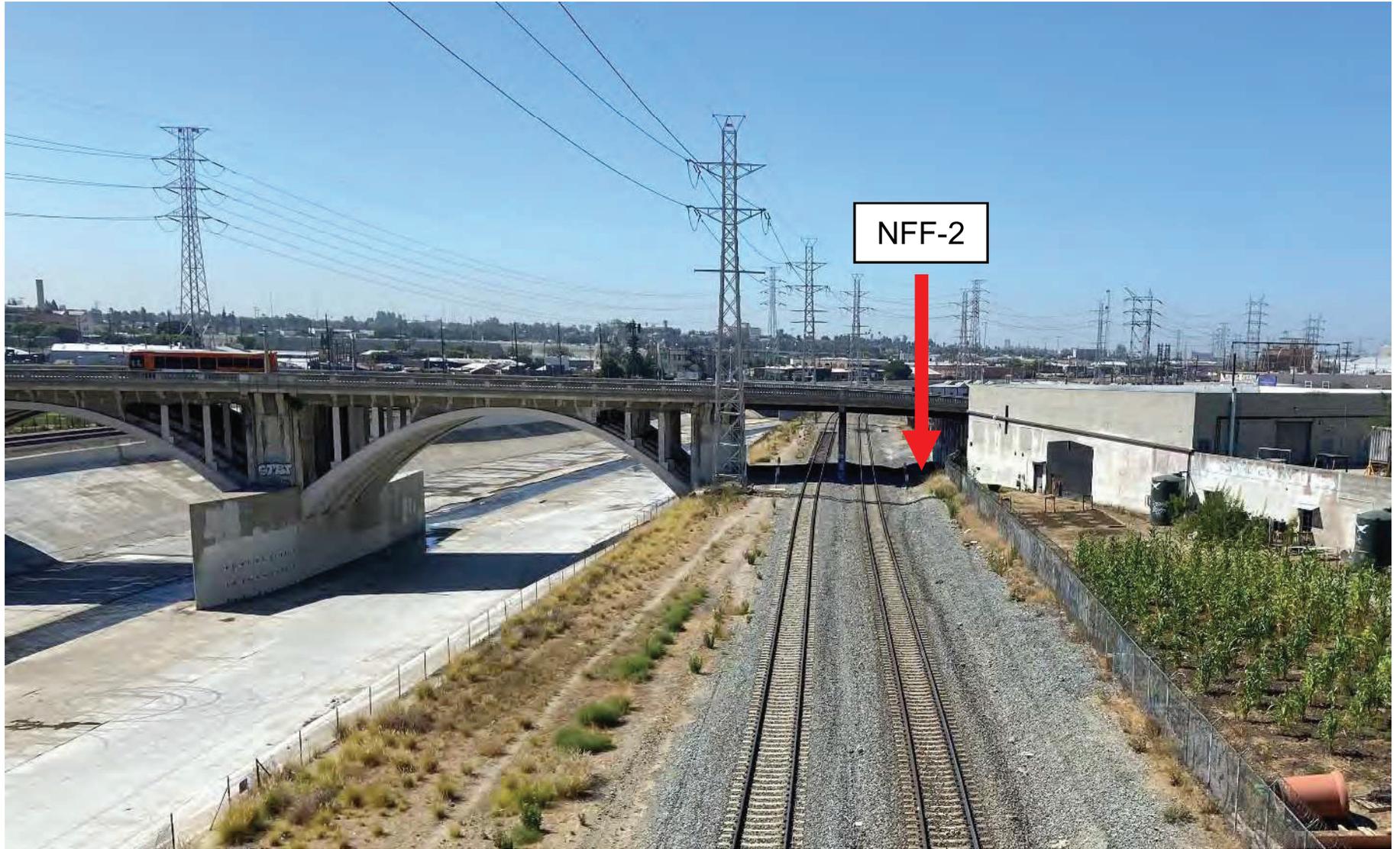
As previously discussed, between 2016 and 2018, all buildings within the district except the easternmost structure (12820 Panama Street, occupied by long-time tenant Teledyne Microelectronic Technologies) were demolished and replaced in 2019 with office buildings, a parking structure, and a charter school. The sole extant contributing resource to the district is the building at 12810 Panama Street, which is approximately 355 meters from the Site Location FF-30, well beyond the 100 meters Study Area. **As such, a TCN Structure at Site Location FF-30 would not cause a substantial adverse change in the historical significance of the Panama Street Industrial Historic District, and no impact as a result of the Project would occur.**

*(g) North Spring Street Bridge*

The North Spring Street Bridge is shown in Figure IV.D-2 on page IV.D-42. The Project is not anticipated to result in a physical impact to North Spring Street Bridge. However, as shown in Figure IV.D-3 on page IV.D-43, Site Location NFF-2 is within 15 feet of this resource. A TCN Structure in such close proximity to the bridge would result in a visual impact on the resource, diminishing its integrity of setting and feeling. No other signage was identified in close proximity to the bridge. Character-defining features are clearly visible from parallel bridges north and south of the North Spring Street Bridge. Although the resource is within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, a TCN Structure at Site Location NFF-2 would impede visibility of and thus detract from character-defining features including its relationship with the Los Angeles River, its multiple open spandrels, and its



**Figure IV.D-2**  
North Spring Street Bridge



**Figure IV.D-3**  
Site Location NFF-2 in Relation to the North Spring Street Bridge

Beaux Arts–inspired design details. **As such, a TCN Structure at Site Location NFF-2 would cause a substantial adverse change in the historical significance of the North Spring Street Bridge, and impacts to this resource as a result of the Project would be potentially significant.**

*(h) Lankershim Depot*

The Lankershim Depot is shown on Figure IV.D-4 on page IV.D-45. The Lankershim Depot was recommended eligible for the NRHP and listed in the CRHR under Criteria A/1 and C/3. The Project as proposed anticipates no physical impact on the resource. However, Site Location NFF-3 is approximately 100 feet east of the depot, separated by small park. The building has entrances on its north and south elevations. As shown on Figure IV.D-5 on page IV.D-46, the proposed TCN Structure at NFF-3 may impede views of the resource from street level along Chandler and Lankershim Boulevards, as the proposed location of NFF-3 is on the same block of Chandler Boulevard as the depot, with no intervening vegetative cover or vertical incursions. Interpretive signage in the park is focused on the historic significance of the depot and railroad. A TCN Structure in such close proximity to the depot would result in visual impact on the resource and diminishing its integrity of setting and feeling. Character-defining features are clearly visible from passersby at street level. Although the resource is within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, the proposed TCN Structure would impede visibility of and thus detract from character-defining features including its construction methods and materials and its rail-related transportation association. **As such, the proposed TCN Structure at Site Location NFF-3 would cause a substantial adverse change in the historical significance of the Lankershim Depot and impacts to this resource as a result of the Project would be potentially significant.**

*(i) United States Post Office North Hollywood*

The Project is not anticipated to result in a physical impact to the United States Post Office North Hollywood. Site Location NFF-3 is approximately 200 feet northeast of the post office. The building's façade is its north elevation (toward signage). A TCN Structure at Site Location NFF-28 would not impede views of the resource from street level, as the proposed Site Location NFF-28 is across Chandler Boulevard and the post office has heavy vegetative cover at its north elevation along Chandler Boulevard and at its east elevation along Bakman Avenue.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting, which has already been subject to modern infill. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition,



**Figure IV.D-4**  
Lankershim Depot



**Figure IV.D-5**  
Site Location NFF-3 in Relation to the Lankershim Depot

while the Project would be visible from certain locations on the property, and would introduce a new visual element to its setting, the building's significance under Criterion A/1 is not dependent on its setting. The Project would not impact the character-defining features of the building. Its integrity of location, design, materials, workmanship, feeling, and association would be unchanged. The resource's integrity of setting may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, a TCN Structure at Site Location NFF-3 would not cause a substantial adverse change in the historical significance of the U.S. Post Office North Hollywood, and impacts to this resource as a result of the Project would be less than significant.**

*(j) Site of Campo de Cahuenga*

The Project is not anticipated to result in a physical impact to the Site of Campo de Cahuenga. The historic architectural resource is approximately 100 feet from Site Location NFF-4 and 240 feet northeast of Site Location NFF-5. The TCN Structures at Site Locations NFF-4 and NFF-5 would not impede views of the resource from street level, as a modern pedestrian overpass structure and a pedestrian underpass entrance both stand between the Site Locations and the Site of Campo de Cahuenga.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from certain locations on the property, and would introduce a new visual element to its setting, the resource's context outside of its walled boundaries is entirely modern. The Project would not impact the character-defining features of this resource (its Spanish Colonial Revival architecture and stone and tile building materials). Its integrity of location, design, materials, workmanship, feeling, and association would be unchanged. The resource's integrity of setting may be only slightly impacted by the Project, and not to a degree that the site would be unable to convey its significance. **As such, TCN Structures at Site Locations NFF-4 and NFF-5 would not cause a substantial adverse change in the historical significance of the Site of Campo de Cahuenga, and impacts to this resource as a result of the Project would be less than significant.**

*(k) Broadway Theater and Commercial District*

The Project is not anticipated to result in a physical impact to Broadway Theater and Commercial District. Site Location NFF-6 would be located outside the boundary of the Broadway Theater and Commercial District, approximately 180 feet from the closest contributing resource. Pedestrians and cars traveling southeast on West 4th Street may have an impeded view of the northernmost block of the original six-block Broadway Theater

and Commercial District, but contributing resources in the District are now largely surrounded by modern infill.

During Project construction, visual, atmospheric, and audible elements may be introduced to the Broadway Theater and Commercial District's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the Broadway Theater and Commercial District's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project may be visible from certain vantage points within the Broadway Theater and Commercial District, and therefore introduce a new visual element to its setting. However, the Broadway Theater and Commercial District's significance under Criteria A/1 and C/3 is not dependent on its setting, aside from its collective commercial and entertainment use. The Project would not impact the character-defining features of the Broadway Theater and Commercial District (its commercial and theater origins, and architectural details of individual buildings). Its integrity of location, design, materials, workmanship, feeling and association would be unchanged. Its integrity of setting may be impacted by the Project, but not to a degree that the Broadway Theater and Commercial District would be unable to convey its significance. **As such, a TCN Structure at Site Location NFF-6 would not cause a substantial adverse change in the historical significance of the Broadway Theater and Commercial District, and impacts to this resource as a result of the Project would be less than significant.**

*(l) Subway Terminal Building*

The Project is not anticipated to result in a physical impact to the Subway Terminal Building. Site Location NFF-6 is approximately 240 feet northeast of this resource. The building's main façade is its southeast elevation, so the Project would be visible from the building, diagonally across South Hill and West 4th Streets. However, a TCN Structure at Site Location NFF-6 would not impede primary views of the resource from street level. Existing signage and modern infill are present within the immediate vicinity of the resource.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from the building, and therefore introduce a new visual element to its setting, the building's significance under Criterion A/1 for Transportation and Criterion C/3 for Architecture is not dependent on its setting. The Project would not impact the character-defining features of the building (its use and Italian Renaissance Revival details). The resource's integrity of location, design, materials, workmanship, feeling, and association would be unchanged. Its integrity of setting may be impacted by the Project, but not to a degree that the building

would be unable to convey its significance. **As such, a TCN Structure at Site Location NFF-6 would not cause a substantial adverse change in the historical significance of the Broadway Theater and Commercial District, and impacts to this resource as a result of the Project would be less than significant.**

*(m) Angels Flight Railway*

The Project is not anticipated to result in a physical impact to the Angels Flight Railway. Site Location NFF-6 is approximately 300 feet south of this resource. For travelers on the railway, the Project would be visible to the southeast when viewed from the top on the railway, albeit partially shielded due to vegetative cover and topography. However, a TCN Structure at Site Location NFF-6 would not impede views of the railway at street level.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from certain locations on the Angels Flight Railway, and therefore would be a new visual element to its setting, the railway's significance under Criterion A/1 for Transportation and Criterion C/3 for Architecture and Engineering is not dependent on its setting (beyond its inclined location). The Project would not impact the character-defining features of the building (its use, engineering, and Beaux Arts details). Its integrity of location, design, materials, workmanship, feeling, and association would be unchanged. The resource's integrity of setting may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, a TCN Structure at Site Location NFF-6 would not cause a substantial adverse change in the historical significance of the Angels Flight Railway, and impacts to this resource as a result of the Project would be less than significant.**

*(n) Batson's Fine Laundering and Dry Cleaning*

The Project is not anticipated to result in a physical impact to Batson's Fine Laundering and Dry Cleaning. Site Location NFF-11 is approximately 200 feet northwest of this resource. The building's main façade is its west elevation, so the Project would be visible from the building, diagonally across Crenshaw Boulevard and South Victoria Avenue. However, a TCN Structure at Site Location NFF-11 would not impede views of the resource from street level.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take

approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from the building, and would introduce a new visual element to its setting, the building's significance under Criterion A/1 for Commerce is not dependent on its setting. The Project would not impact the character-defining features of the building (its use and association with commerce in the neighborhood). Its integrity of location, design, materials, workmanship, feeling, and association would be unchanged. The resource's integrity of setting (which has been subject to modern infill) may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, a TCN Structure at Site Location NFF-11 would not cause a substantial adverse change in the historical significance of Batson's Fine Laundering and Dry Cleaning, and impacts to this resource as a result of the Project would be less than significant.**

*(o) Macy Street School*

The Project is not anticipated to result in a physical impact to Macy Street School. Site Location NFF-13 is approximately 290 feet southeast of this resource. The building has pedestrian entries on its west, south and east elevations. The Project would be visible from the building, diagonally across East Cesar E Chavez Avenue and North Vignes Street. However, a TCN Structure at Site Location NFF-13 would not impede views of the resource from street level, and nearly the entirety of the area is modern infill.

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting. However, construction activities would take approximately four weeks, and therefore would be temporary in nature. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from the building, and would introduce a new visual element to its setting, the building's significance under Criterion A/1 for Education and Ethnic Heritage and Criterion B/2 for its association with Nora Sterry is not dependent on its setting. The Project would not impact the character-defining features of the building (its use, its English Renaissance Revival details). Its integrity of location, design, materials, workmanship, feeling, and association would be unchanged. The resource's integrity of setting may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, a TCN Structure at Site Location NFF-13 would not cause a substantial adverse change in the historical significance of Macy Street School, and impacts to this resource as a result of the Project would be less than significant.**

*(p) Little Tokyo Historic District*

The Little Tokyo Historic District is shown in Figure IV.D-6 on page IV.D-51. The Project is not anticipated to result in a physical impact to the Little Tokyo Historic District.



**Figure IV.D-6**  
Little Tokyo Historic District

As shown in Figure IV.D-7 on page IV.D-53, Site Location NFF-16 is approximately 120 feet southeast of this resource. While a TCN Structure at Site Location NFF-16 would be located outside the boundary of the Little Tokyo Historic District and the Little Tokyo Historic District and its surroundings are largely commercial, field observations indicate that buildings in the Study Area are largely three stories or less. A TCN Structure with a height of 30 feet, as is proposed for Site Location NFF-16, directly facing the district in such close proximity has the potential to have significant visual impact on the Little Tokyo Historic District, diminishing its integrity of setting and feeling. Although the resource is within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, the TCN Structure at Site Location NFF-16 would potentially overshadow the pre-World War II character of the Little Tokyo Historic District and its contributing resources. **As such, a TCN Structure at Site Location NFF-16 would cause a substantial adverse change in the historical significance of the Little Tokyo Historic District, and impacts to this resource as a result of the Project would be potentially significant.**

*(q) Japanese Village Plaza*

Japanese Village Plaza is shown on Figure IV.D-8 on page IV.D-54. The Project is not anticipated to result in a physical impact to the Japanese Village Plaza. As shown on Figure IV.D-9 on page IV.D-55, Site Location NFF-16 is approximately 70 feet east of this resource. While the Plaza and its surroundings are largely commercial, buildings in the Study Area are largely three stories or less. A TCN Structure with a proposed height of 30 feet, as is proposed for Site Location NFF-16, in such close proximity (directly across the street from the resource) has the potential to have significant visual impact on the resource, diminishing its integrity of setting and feeling. Although the resource is within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, a TCN Structure at Site Location NFF-16 would potentially overshadow the Japanese American character and identity of the Plaza. **As such, a TCN Structure at Site Location NFF-16 would cause a substantial adverse change in the historical significance of the Japanese Village Plaza, and impacts to this resource as a result of the Project would be potentially significant.**

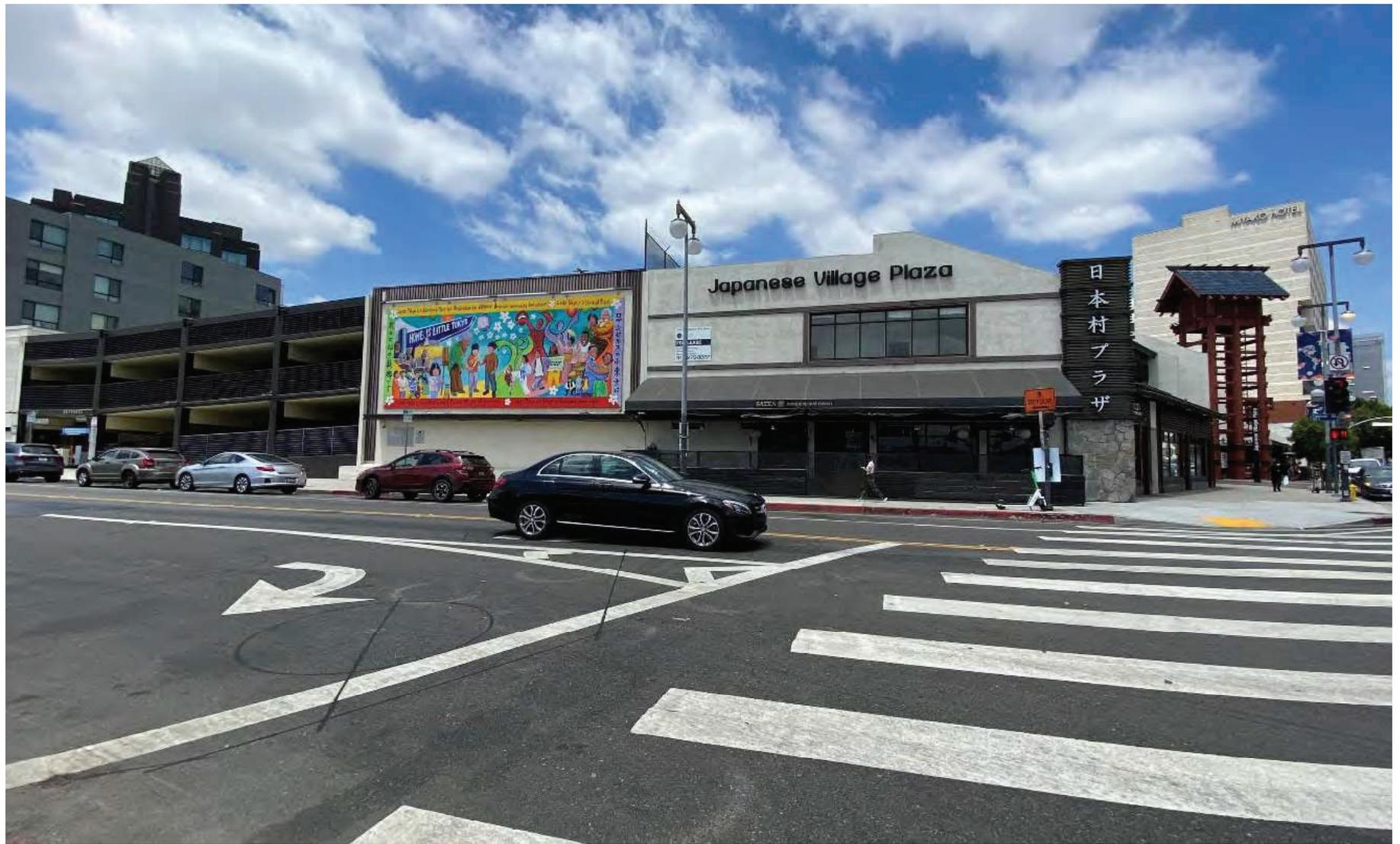
*(r) Nicholas Priester Building*

The Project is not anticipated to result in a physical impact to the Nicholas Priester Building. Site Location NFF-20 would be located approximately 75 feet south of this resource. The building's primary entrance is on its east elevation. A TCN Structure at Site Location NFF-20 would not impede views of the resource from street level, as the location of Site Location NFF-20 is across Santa Monica Boulevard.



**Figure IV.D-7**

Site Location NFF-16 in Relation to the Little Tokyo Historic District



**Figure IV.D-8**  
Japanese Village Plaza



**Figure IV.D-9**  
Site Location NFF-16 in Relation to the Japanese Village Plaza

During Project construction, visual, atmospheric, and audible elements may be introduced to the resource's setting, but to an extent that is temporary and/or minor. Given its urban location, the resource's setting is subject to the visual, atmospheric, and audible effects of its environment on a regular basis. In addition, while the Project would be visible from the building, and would introduce a new visual element to its setting, the building's significance under Criteria A/1 and C/3 is not dependent on its setting, beyond its location along a former streetcar route. The building has also been subject to extensive modern infill within its viewshed. The Project would not impact the character-defining features of the building (association with commercial development related to a streetcar corridor, and Renaissance Revival architectural details). The resource's integrity of location, design, materials, workmanship, feeling, and association would be unchanged. Its integrity of setting may be impacted by the Project, but not to a degree that the building would be unable to convey its significance. **As such, A TCN Structure at Site Location NFF-20 would not cause a substantial adverse change in the historical significance of the Nicholas Priester Building, and impacts to this resource as a result of the Project would be less than significant.**

*(s) Fourth Street Bridge*

The Fourth Street Bridge is shown in Figure IV.D-10 on page IV.D-57. The Project is not anticipated to result in a physical impact to the Fourth Street Bridge. However, as shown on Figure IV.D-11 on page IV.D-58, Site Location NFF-21 is within 15 feet of this resource. A TCN Structure in such close proximity to the Fourth Street Bridge would result in visual impact on the resource, diminishing its integrity of setting and feeling. No other signage was identified in close proximity to the bridge. Character-defining features are clearly visible from pedestrian level and parallel bridges north and south of the Fourth Street Bridge. Although the resource is within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, a TCN Structure at Site Location NFF-21 would impede visibility of and thus detract from character defining features including its fixed-hinge arch spans. **As such, a TCN Structure at Site Location NFF-21 would cause a substantial adverse change in the historical significance of the Fourth Street Bridge, and impacts to this resource as a result of the Project would be potentially significant .**

*(t) Summary and Conclusion*

As discussed above, 14 of the 19 historical resources that would be within 100 meters of a Site Location would not be significantly impacted by the Project. For these resources, existing visibility of the resources would not be impeded. During Project construction, visual, atmospheric, and audible elements may be introduced to these resource's settings, but would be temporary and/or minor given the limited construction duration. Given their urban locations, the settings of these resources are subject to the



**Figure IV.D-10**  
Fourth Street Bridge



**Figure IV.D-11**  
Site Location NFF-21 in Relation to the Fourth Street Bridge

visual, atmospheric, and audible effects of their urban environments on a regular basis. No aspects of the integrity of these resources would have the potential to be significantly diminished by the Project. As shown in Table IV.D-3 on page IV.D-60, with regard to these 14 historical resources and the 14 TCN Structures associated with them, there would be no impact or impacts would be less than significant.

The Project would result in potentially significant and unavoidable visual impacts on the remaining five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), the Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044). As shown in Table IV.D-4 on page IV.D-61, such significant and unavoidable impacts are specifically associated with four of the 17 Site Locations that would be within 100 meters of a historical resource including Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. These Site Locations are within immediate proximity of their associated historical resources, and the Project would likely result in permanent and unavoidable visual impacts by fundamentally affecting the integrity of setting and feeling. Although these resources are within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, the TCN Structures at these Site Locations would likely detract from the character-defining features and affect the viewsheds of the resources.

**Therefore, the Project would cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. As such, impacts to historical resources as a result of the Project would be potentially significant.**

## (2) Mitigation Measures

Project-level impacts related to historical resources would be potentially significant. Review of potential measures to reduce the Project's significant impacts, such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Rather, the primary way to substantially reduce these impacts would be to eliminate the Site Locations. Therefore, no mitigation measures are proposed or included. Refer to Section V, Alternatives, of this Draft EIR for a discussion of alternatives that eliminate the Site Locations in order to substantially reduce the Project's significant impacts related to historical resources.

## (3) Level of Significance After Mitigation

Project-level impacts related to historical resources were determined to be significant and unavoidable. No feasible mitigation measures have been identified to address the impacts at Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. Therefore, no mitigation measures were proposed or included, and the impact level remains significant and unavoidable. However, refer to Section V, Alternatives, of this Draft EIR for a

**Table IV.D-3  
Site Locations Resulting in a Less Than Significant or No Impact**

<b>Site Location</b>	<b>Historical Resources in Study Area</b>	<b>Impact Assessment</b>
FF-1	Los Angeles Union Station Passenger Terminal and Grounds	Less than Significant
FF-2	Magellan Storage	Less than Significant
FF-13	Van De Kamp's Holland Dutch Bakery	Less than Significant
FF-27	Billingsley's Golden Bull	Less than Significant
FF-28	9190 Exposition Blvd	Less than Significant
FF-30	Panama Street Industrial Historic District	No Impact
NFF-3 <sup>a</sup>	United States Post Office North Hollywood	Less than Significant
NFF-4	Site of Campo de Cahuenga	Less than Significant
NFF-5	Site of Campo de Cahuenga	Less than Significant
NFF-6	Broadway Theater and Commercial District; Subway Terminal Building; Angels' Flight Railway	Less than Significant
NFF-11	Batson's Fine Laundering and Dry Cleaning	Less than Significant
NFF-13	Macy Street School	Less than Significant
NFF-15	Billingsley's Golden Bull	Less than Significant
NFF-20	Nicholas Priester Building	Less than Significant
<p><sup>a</sup> <i>TCN Structure NFF-3 would result in less than significant impacts related to the United States Post Office North Hollywood, however, the proposed TCN Structure at NFF-3 would result in significant and unavoidable impacts related to the Lankershim Depot.</i>  Source: HDR, Inc., August 2022.</p>		

discussion of an alternative that eliminates the Site Locations that result in the significant impact to historical resources.

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

**(1) Impact Analysis**

The Site Locations are all on Metro-owned property that is currently used for Metro operations including rail corridors, stations, parking, bus depots, and equipment lots. As such, the Site Locations are on previously developed areas that have been subject to grading, excavation and fill activities. As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Existing static displays that include a support column would be cut at approximately 2 feet below grade and filled in with similar material to the surrounding landscape. As the ground would be previously disturbed

**Table IV.D-4  
Site Locations Resulting in Significant and Unavoidable Impacts**

<b>Site Location</b>	<b>Historical Resources in Study Area</b>	<b>Impact Assessment</b>
NFF-2	North Spring Street Bridge, Caltrans Bridge No. 53C0859	Significant and Unavoidable
NFF-3	Lankershim Depot	Significant and Unavoidable
NFF-16	Little Tokyo Historic District; Japanese Village Plaza	Significant and Unavoidable
NFF-21	Fourth Street Bridge, Caltrans Bridge No. 53C0044	Significant and Unavoidable
<i>Source: HDR, Inc., August 2022.</i>		

surficial archaeological resources that may have existed at one time have likely been previously disturbed and impacts during removal of the static displays would be less than significant.

As discussed above, the Site of Campo de Cahuenga is approximately 100 feet from Site Location NFF-4 and 240 feet northeast of Site Location NFF-5. The Site of Campo de Cahuenga is listed on the National Register and California Register under Criteria A/1, C/3 and D/4 and was designated SRL #151 in 1940. Portions of original adobe tiles and foundation were encountered during construction monitoring in 1995, and subsequent excavations uncovered all but the northeast and southeast corners of the original building's footprint. Recovered artifacts included Native American pottery, two stone pestles, Chinese porcelain, and two kaolin pipes. The archaeological site, which is designated as CA-LAN-1945H (contributing element), consists of the original Mission San Fernando Adobe stone foundations and tile floors built in 1795. The Site Locations are separated from the Site of Campo de Cahuenga by buildings and intervening roadways and is not anticipated to result in a physical impact on the Site of Campo de Cahuenga.

LAN-4660H is a historic period archaeological site that consists of paving stone, two sets of narrow-gauge streetcar tracks, and a railroad spike that were recovered during utility excavation along Macy Street. The tracks were preserved directly beneath the surface asphalt and in the center of the street. The paving stones were recovered from different locations between 8 and 10 feet below the existing grade and had been dislocated from their original location as part of a former street surface. Several railways have been constructed along Macy Street, the first of which was built in 1897 as part of the Los Angeles Railway Company, which was eventually absorbed into the Pacific Electric (Red Car) network. Versions of the streetcar system remained in use until 1963. LAN-4660H, was identified directly within the Project Area for TCN Structure NFF-13; however, the Site

Location of the TCN Structure avoids the archaeological components within the mapped site boundary.

As included as part of the CHRIS records search the following additional nineteenth and twentieth century archaeological historic sites were identified nearby Site Locations NFF-4 and NFF-5: CA-LAN-2394H includes a historic-era trash filled trench and a truncated round, red brick-lined well identified under approximately 21 feet and seven inches of fill soil associated with site LAN-1945H; CA-LAN-2394H includes three historic-era artifact concentrations with ceramics, glass bottles, cutlery, dishes, bowls, cups, wash basins, pots, pans, horseshoes, etc.; CA-LAN-3303H includes a large domestic trash dump site identified 25 feet below the surface and most likely buried by flooding of the Los Angeles River in 1938. CA-LAN-3304H includes a large trash pit composed of automobile parts and newspapers. Lastly, CA-LAN-3305H includes a domestic trash dump site associated with multi-family condominiums consisting of glass bottles, ceramics, Melmac, metal, bones, shell, and other domestic refuse. These Site Locations are located outside of the historic mapped boundaries.

The TCN Structures would be constructed with the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display. Given that the Project would include excavations to a maximum depth of approximately 50 feet below ground surface, there may be a potential to encounter unknown archaeological resources that could be present at the Site Locations. **Therefore, impacts with regard to archaeological resources during construction of the TCN Structures are potentially significant. However, Mitigation Measure CUL-MM-1 is provided below, which includes retention of a qualified archaeologist to implement a Cultural Resource Monitoring and Treatment Plan to address the potential discovery of archaeological resources. As such, with the implementation of Mitigation Measure CUL-MM-1, the Project's impacts on archaeological resources would be less than significant.**

## (2) Mitigation Measures

The following mitigation measure is proposed to address the potential discovery of archaeological resources during the installation of the TCN Structures:

**Mitigation Measure CUL-MM-1:** Prior to the start of ground disturbance activities during Project construction, including demolition, digging, trenching, drilling, or a similar activity (Ground Disturbance Activities), a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project impacts on

unanticipated archaeological resources unearthed during construction. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Site Locations, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements.

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Site Locations, for Metro inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities.

The archaeological monitor(s) shall observe all Ground Disturbance Activities on the Site Locations that involve native soils. If Ground Disturbance Activities are occurring simultaneously at multiple Site Locations, the principal archaeologist shall determine if additional monitors are required for other Site Locations where such simultaneous Ground Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the archaeological monitor determines that monitoring is no longer necessary.

### (3) Level of Significance After Mitigation

Mitigation Measure CUL-MM-1 would provide for monitoring of ground disturbance activities in native soils on-site to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction of the TCN Structures. **With the implementation of Mitigation Measure CUL-MM-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, impacts with respect to Threshold (b) would be less than significant with mitigation incorporated.**

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Site Locations for the TCN Structures are located within urbanized areas of the City that have been subject to previous grading and development. No known traditional burial sites have been identified on the Site Locations. Nevertheless, as the Project would require excavation at depths of up to 50 feet, the potential to uncover existing but undiscovered human remains exists. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area for the TCN Structure would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. **Therefore, as determined in the Initial Study, in the unlikely event that any human remains are discovered during construction, compliance with regulatory requirements would reduce potential impacts to a less than significant level. As such, impacts with respect to Threshold (c) would be less than significant after compliance with regulatory requirements.**

## e. Cumulative Impacts

### (1) Impact Analysis

#### *(a) Historical Resources*

Cumulative impacts may occur if the Project and related projects, as identified in Section III. Environmental Setting of this Draft EIR, cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type or significant within the same context as the ones within the Study Area of the Project Site. A significant cumulative impact associated with the Project and related projects would occur if the combined impact of the Project and related projects would materially and adversely alter those physical characteristics that convey the historic significance of a historical resource and that justify its listing, or eligibility for listing, as a historical resource. Each of the related projects would be required to study and, if necessary, mitigate any impacts on the integrity or significance of surrounding historical resources. However, if the related projects would result in

significant and unavoidable impacts on a historical resource that is the same property type or significant within the same context as the ones within the Study Area of a Site Location, the Project's cumulative impact to historical resources would be potentially significant and unavoidable. **Therefore, cumulative impacts to historical resources are conservatively concluded to be potentially significant and unavoidable.**

*(b) Archaeological Resources*

As discussed above, with the implementation of Mitigation Measure CUL-MM-1, the Project would not result in significant impacts to archaeological resources during ground disturbing activities. Additionally, in the event that archaeological resources are uncovered in related projects, each related project would be required to comply with applicable regulatory requirements, including CEQA Guidelines Section 15064.5, Public Resources Code Section 21083.2, as well as any site-specific mitigation identified for that related project and/or the City's standard Condition of Approval addressing the inadvertent discovery of archaeological resources. **Therefore, the Project and related projects would not result in cumulative impacts to archaeological resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts to archaeological resources would be less than significant.**

*(c) Human Remains*

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

## (2) Mitigation Measures

With regard to historical resources, cumulative impacts would be potentially significant and unavoidable and no feasible mitigation measures have been identified to address the impacts at a specific Site Location. However, refer to Section V. Alternatives for a discussion of an alternative that eliminates the Site Locations that result in the significant project and cumulative impact to historical resources. With regard to archaeological resources, as set forth above, the Project would implement revised

Mitigation Measure CUL-MM-1 related to archaeological resources. With regard to human remains, cumulative impacts would be less than significant. As such, no mitigation measures related to human remains are required.

### (3) Level of Significance After Mitigation

With regard to historical resources, cumulative impacts were determined to be potentially significant and unavoidable and no mitigation measures have been identified. As such, no mitigation measures related to cumulative historical resources have been proposed or included, and the level of significance remains potentially significant and unavoidable. With regard to archaeological resources, with implementation of Mitigation Measure CUL-MM-1, the Project would not contribute to cumulative impacts associated with archaeological resources and such cumulative impacts would be less than significant. With regard to human remains, cumulative impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included for human remains, and the impact level remains less than significant.