

IV.C CULTURAL RESOURCES

1. INTRODUCTION

This section addresses the potential impacts of the project on historic resources. An evaluation of the potential for both direct impacts (impacts to resources on the project site) and indirect impacts (impacts to resources in the project vicinity) is included. The information contained in this section is derived from a historic resources assessment prepared by Chattel Architecture, Planning, and Preservation, Inc.¹ This report, dated August 28, 2007, is provided in **Appendix IV.C** of this draft EIR. As part of the scoping process for this draft EIR, the City of Los Angeles Planning Department determined that impacts associated with archaeological resources, human remains and paleontological resources could be mitigated to a less than significant level and, therefore, limited study of these cultural resource topics is provided within this draft EIR.

2. ENVIRONMENTAL SETTING

a. Historic Context

The area of Wilshire Boulevard spanning from roughly La Brea to Fairfax Avenues, known as Miracle Mile, is recognized as one of the first outlying commercial corridors developed to challenge the hegemony of downtown Los Angeles and to take advantage of the emerging popularity of automobiles. The development of this commercial corridor was dubbed a “miracle” for several reasons. First, it occurred in spite of restrictive residential zoning that had been established by the original owner, Gaylord Wilshire. Second, it was developed in the absence of a previously established residential or retail community.

At the time that A.W. Ross, a relatively unknown real estate agent, began to assemble property along Wilshire Boulevard, the area was substantially undeveloped. However, in hindsight, it appears that Ross’s selection of the area was carefully considered. The area was within a 4-mile radius of Los Angeles’ wealthiest residential districts of the period: Westlake, Hollywood, and Beverly Hills, it promised to be in the path of western expansion from downtown, and its lack of established infrastructure allowing the developer to be designed and oriented toward the newly popular automobile. Ross gambled that people living within a few miles of his new retail district would “prefer the drive to the Miracle Mile to the journey downtown if the right goods were available,” and if parking was easy and accessible. To diffuse

¹ Chattel, Robert Jay, AIA, President, Chattel Architecture, Planning & Preservation, Inc., *Historic Resources Assessment and Impacts Analysis for Wilshire-La Brea Project, Los Angeles, CA*. August 28, 2007.

traffic and make the whole development look larger, Ross placed each of the major buildings at “least one block from one another rather than clustered around an intersection.”

The first major retail establishment developed in the Miracle Mile was Desmond’s, a prominent clothing store with three downtown locations. The Desmond’s building (1928), located at 5500–5514 Wilshire Boulevard was the first multi-story office space anywhere along the boulevard. The building, with a large, low-slung retail footprint and relatively small tower, established several design themes that became prevalent in the district. It had a large footprint to maximize retail square footage and an unobstructed office tower, which gave the building a metropolitan character, provided tenant space, and acted as a built-in billboard for advertising. This retail store also featured its own surface parking lot at the rear of the building, which became a popular approach for providing parking relatively easily and cheaply.

After Desmond’s, a number of retailers were lured to the new Miracle Mile. Myer Siegel (women’s apparel) and C.H. Baker (shoes) opened stores in the Dominguez-Wilshire Building (1930–1931), located at 5410 Wilshire Boulevard, and designed by Morgan, Walls, and Clements. Other major retailers included Ralph’s Grocery (1928), Coulters (1937 – demolished), and the May Company (1938). Marking the eastern edge of the precinct was the E. Clem Wilson Building (Mutual of Omaha, 1929–1930), located at 5217 Wilshire Boulevard, just east of La Brea Avenue, and designed by the architectural firm of Meyer and Holler. Between these large anchor buildings at each major intersection, low-rise retail structures were designed to front on Wilshire Boulevard.

Built during the late 1920s and 1930s, the majority of buildings in the Miracle Mile exhibit aspects of the Art Deco style – Zig Zag Moderne and Streamline Moderne – popular during the period. Zig Zag Moderne, most popular in the 1920s, is epitomized in the use of vertical massing, towers, polychromatic terra cotta, metal, and neon-lighting. Streamline Moderne style, popular in the 1930s, is characterized by curved corners, horizontal lines, use of glass, and undecorated surfaces. Today, this area contains one of the best and most concentrated collections of Art Deco buildings in Los Angeles.

The primary side streets intersecting Wilshire Boulevard developed their own low-rise commercial character. For instance, commercial establishments along La Brea Avenue between Beverly Boulevard, north of Wilshire Boulevard, and Olympic Boulevard, south of Wilshire Boulevard, focused on the automobile with dealerships, used car lots, repair garages, gas stations, and similar auto-related services. According to the Sanborn Fire Insurance Map from 1950, there were almost 50 automobile-related commercial enterprises in the nine block stretch of La Brea Avenue between Beverly and Olympic Boulevards. In a number of cases, multiple properties were combined to create large lots for new and used auto sales.

Land uses in the immediate vicinity of the project site include high-rise office buildings and commercial-retail, office and residential uses.

b. Project Site

The project site is presently occupied by a church, a commercial strip center, and a paved parking lot. The Wilshire Grace Church is located at 5220 Wilshire Boulevard, on the southeast corner of Wilshire Boulevard and La Brea Avenue. The three-story (plus basement), reinforced concrete building was constructed in 1965 and was formally occupied by a bank. The Metroplaza Mall is located at 716–750 La Brea Avenue, along the western half of the project site. The center is a combination of older structures retrofitted for adaptive use and new, replacement structures. The main structure was constructed in 1945. The paved parking lot located on the eastern portion of the project site is utilized by both the church and commercial strip center patrons. The locations of the buildings on the project site are shown in **Figure IV.C-1, Potential Historical Resources On and In the Vicinity of the Project Site**. A description of both buildings is provided below. More detailed descriptions of the buildings and photographs of the buildings are included in the historic resources assessment provided in **Appendix IV.C**.

Wilshire Grace Church

Property History

The building was constructed in 1965 for the Columbia Savings and Loan Association and replaced a two-story commercial building on the property. The three-story building was one of many savings and loan buildings built in Los Angeles during this period. The Columbia Savings and Loan Association got its start in 1961, when a group of financiers acquired the stock interest from the founders of the company and elected a new board of directors. At the time of this reorganization, the bank's headquarters were located at 5420 Wilshire Boulevard. Throughout the 1960s, 1970s and 1980s, the building was used by a succession of savings and loan and bank organizations. In 1994, the northern portion of the property, including 5220 Wilshire Boulevard, was sold to the Los Angeles Immanuel Mission Church. The church, which changed its name to Wilshire Grace Church, continues to occupy the building although it sold the property in 2005. The property was purchased by the project proponents, BRE Properties, Inc., in 2007.

Exterior

The building, containing three stories and a basement, is made of reinforced concrete and is rectangular in plan with a flat roof. The building rests on a slightly raised platform paved with dark-colored concrete aggregate. All four sides of the building are treated as primary façades but only the east side of the building steps down to grade to serve the neighboring surface parking lot. The four corners of the

building are highlighted by concrete piers clad in end cut marble. Large crosses are affixed to the piers at the southeast and the northwest corners of the building. Fenestration on the first and second floors consists of bands of metal and glass storefronts centered on each elevation. White painted concrete beams extend from the spandrel to form canopies above ground floor fenestration. Ribbed concrete sections, with a strong vertical orientation, cantilever from the third floor in the center of each elevation. Narrow, fixed sash windows are inset between the ribs in these cantilevered elements.

The ground floor fenestration on the west side of the building is screened by a metal (may be copper or other alloy) sculptural fountain that rests in a shallow pool. The fountain, which is 45 feet long and 9 feet tall, is a collage of metal rectangular disks arranged in an abstract, geometric pattern. Pipes threaded through the center of the fountain lead to spouts along the top, suggesting that water was meant to cascade down the sides and collect in the pool. Framed edges of some of the rectangular disks indicate that there may have been additional features (perhaps glass panels) that have been removed (or stolen) over the years.

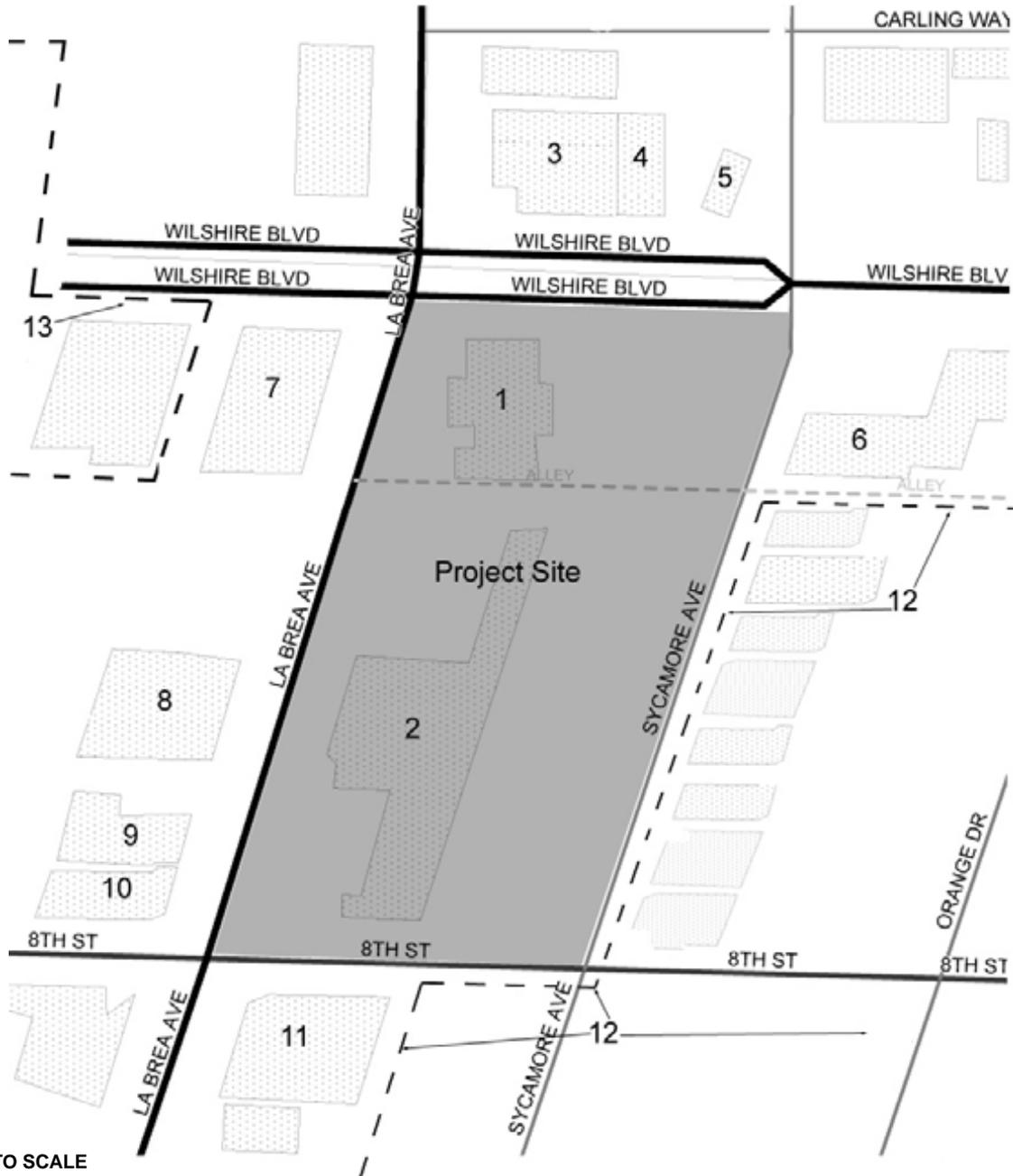
Interior

The focus of the interior is the full building height, high volume, former banking lobby capped by a stained glass skylight. The former banking lobby is now used as a sanctuary with a large open space and raised stage along the north end of the room. On the first floor, walls are clad with beige travertine veneer. A mezzanine extends above the south end of the sanctuary space.

Originally, single-loaded, open corridors with wood railings that overlooked the banking room encircled the light well on the upper floors. The openings around the railings have been enclosed with tinted glass in dark bronze aluminum frames. Corridors have suspended ceilings, carpeting, and a mixture of plaster or wood veneer wall cladding. Offices are arranged around the exterior edge of the building.

A bank of two elevators is located at the southwest corner of the building. The walls of the elevator bank are clad in beige travertine veneer. Enclosed stairwells with utilitarian concrete stairs and metal pipe handrails are located at the southwest and northeast corners of the building. At each corner of the building, coincident with the large piers expressed on the exterior, the walls are clad with end cut marble veneer.

No.	Name	Address	Year Built	Historical Resource?
1	Wilshire Grace Church	5220 Wilshire	1965	No
2	Metroplaza Mall	752 S. La Brea	1945, 1984	No
3	E. Clem Wilson Building / Mutual of Omaha	5217 Wilshire	1930	Yes
4	Security Pacific Bank / Security-First National Bank	5207-5209 Wilshire	1929	Yes
5	Jack-in-the-Box	5201 Wilshire	1997	No
6	N/A	5174 Wilshire	1984	No
7	Bank of America	711 S. La Brea	1942	No
8	Wilshire -La Brea Recreation Center	735 S. La Brea	1938	No
9	AmeriPros Auto Body	747 S. La Brea	1937/1942	No
10	N/A	757 S. La Brea	1925	No
11	Firestone Tire and Repair	800 S. La Brea	1937	Yes
12	Potential Period Revival Residential Historic District	Bounded by Sycamore, Olympic, Highland, and Wilshire	1920-1930	Yes
13	Miracle Mile Historic District	5318-5514 & 5353-5519 Wilshire	1920s	Yes



SOURCE: Chattel Architecture, Planning & Preservation, Inc. - August 2007

FIGURE IV.C-1

Potential Historical Resources On and In the Vicinity of the Project Site

The skylight, designed by Roger Darricarrere, was a specialized design comprising more than 10,000 separate pieces covering an area of almost 1,300 square feet. Darricarrere, a French artist trained at the Ecole des Beaux Arts, immigrated to the United States after World War II to work with Harold W. Cummings, who had recently established the first American studio to design, fabricate and install dalle de verre glass. Dalle de verre glass (also called faceted glass) consists of thick pieces of faceted glass set in concrete or epoxy resin to form a solid structure. Darricarrere was trained in the dalle de verre technique by August Labouret, an early pioneer of the method. After working briefly with Cummings, Darricarrere established a studio in Los Angeles in 1954. Besides his work at this building, Darricarrere's studio appears to have been active in residential and religious commissions throughout southern California from the 1950s to 1970s.

Alterations

Review of City of Los Angeles Building Permits from 1965 to present indicates that the building has not been substantially altered since it was originally constructed. Although a number of building permits have been issued since 1965, they appear to document relatively minor alterations including changes to the signage and addition or removal of interior partitions. Visual inspection indicates that the building has undergone some alterations (dates unknown) including converting the banking lobby to a sanctuary (with raised stage) for current church use, installation of tinted glass enclosing the corridors, and contemporary finishes.

Architectural Style

The building has been called a Late Modern expression combining aspects of Brutalism and International Style architecture. The International Style, characterized by an absence of ornament, uniform wall surfaces, cantilevering, horizontality, and bands of windows, minimizes mass and weight for the sake of the effect of pure volume. Whereas the International Style placed a premium on horizontality and expressing volume, Brutalism is characterized by weight and massiveness with an emphasis on expressing structure and raw materials. In Brutalist architecture, the structure, often with exposed concrete frame, is frankly exhibited, broad, quiet wall surfaces are interrupted by deep-shadowed penetrations of the building mass, vertical slots may contrast with broad oblong openings or tall openings with horizontal slots, and 'egg-crate' effects are also much employed.

The building at 5200 Wilshire Boulevard includes elements from both the International Style and Brutalism in its architectural expression. The horizontal glazing at the ground and second floors, exterior finishes (including painted concrete), and cantilevered projections of the building are typical elements of

the International Style. The geometric massing, vertical slot windows, and overall sense of weight and massiveness may be expressive of Brutalism.

Much of modern architecture is an amalgamation of architectural expressions from an earlier period. In the case of 5220 Wilshire Boulevard, the assortment of stylistic elements adds up to something that is both more and less than the sum of the parts. Expressing the geometric massing and vertical slot windows typical of Brutalism negates the horizontal and volumetric emphasis of the International Style. The application of paint and stone veneer on the exterior, while appropriate for International Style buildings, completely misses one of the central principles of Brutalism; the expression of raw materials, particularly exposed concrete. In an effort to combine these two styles, the architect created a structure that does not effectively express or celebrate either style. Thus, the building is neither architecturally distinctive nor a meaningful and unique architectural expression.

Irving D. Shapiro & Associates

The architect for the project, Irving D. Shapiro, of Irving D. Shapiro & Associates, received his BA and MA degrees in Architecture from UC Berkeley in 1949 and 1950, respectively. Prior to establishing his own architecture and land use planning firm in Beverly Hills, Shapiro attended Columbia University where he received an MBA in real estate in 1956 and a Ph.D. in urban land economics in 1961. At around the same time as the commission for this building, Shapiro's firm was also involved in designing a high-rise office building (MacArthur-Broadway Building) in Oakland, California. In 1965, the Shapiro firm won a Merit Award from the National Prestressed Concrete Institute for their Oakland project. Other projects of the firm included: Anaheim Towers project (1964, may have been demolished), Bank of California Building in San Bernardino (1967) and a regional shopping complex in Honolulu, Hawaii (1968).

Metroplaza Mall

Property History

This building complex is located at 752 La Brea Avenue, on the east side of La Brea Avenue between Wilshire Boulevard and West 8th Street. The complex formerly consisted of several addresses: 716-718, 724, 740, and 750 La Brea Avenue. This portion of the project site is located on a primary north-south street with low-rise and multi-story commercial buildings in the immediate surroundings. An alley runs along the north edge of the property. The property contains four buildings arranged as a double mini-mall centered on a two-story building. There are two parking areas located at each end of the property in front of one-story storefronts.

The buildings located at 752 La Brea Avenue are a combination of older structures retrofitted for adaptive use and new replacement structures. The 1927 Sanborn Fire Insurance Map and a 1929 aerial photograph of the area shows no development on the property.

The property, which is now identified by a single address, was originally several separate properties which came under single ownership in 1984 when all were sold to Metroplaza Partners. In 2005, the consolidated property was sold and it was subsequently purchased by the project proponent in 2007.

A summary of the histories of each of the properties under their original, separate addresses is provided below.

750 La Brea Avenue (Lots 111, 113 and 115)

Building permits and aerial photographs indicate that the first structure on the project site was constructed at the southwest corner around 1930. This building, depicted in a 1935 aerial photograph, was constructed as an automobile repair garage and show room. In the 1940s, the building was known as “Wilshire-La Brea Motors” in advertisements and city directories.

In 1949, the dealership, then a Ford Dealership, was converted for use by Cadillac. In 1955, Cadillac replaced the 750 La Brea facility with a flagship dealership at the corner of Wilshire Boulevard and Orange Drive, which is still in operation as Lou Elhers Cadillac. After Cadillac vacated the building, there is limited information about other occupants. By 1965, an aerial photograph shows that the former dealership at 750 La Brea Avenue had been demolished. An aerial photograph from 1967 shows the site of the former dealership paved and reused as a car sales lot.

The ownership of the property prior to the 1940s is not currently known, however, a quitclaim deed was recorded in 1948 that transferred the property from Helen Lloyd Fitzgerald to Thomas Francis Fitzgerald (her husband). The 750 La Brea Avenue property stayed in this family until the mid 1980s when Robert Kervin Fitzgerald, who had obtained the property from the trustee of Thomas Fitzgerald’s will, sold it to Metroplaza Partners.

Metroplaza Partners appears to have been the owners of the property when it was redeveloped as part of the Metroplaza Mall that currently occupies the site. Today, the former 750 La Brea property is occupied by the southern portion of the two-part mini-mall and surface parking lots.

724 La Brea Avenue (Lots 103 and 105)

The second building constructed on the project site was a small, one-story, octagonal structure at 724 La Brea Avenue. A building permit for this structure was issued in 1931 for construction of a brick sandwich

stand. This structure is visible on the 1935 aerial photograph, where it sits in a somewhat open lot partially surrounded by parked cars.

By 1933 the building was used as a restaurant, by 1942 it appears to have been used for a clock cleaning business, and by 1945 it appears to have been used for a laundry business. In 1945, a building permit was filed by Murphy Oldsmobile to erect a repair garage on the property. Aerial photographs from the period indicate that the repair garage was constructed along the east edge of the property, allowing the original octagonal building to remain in place for several years. According to a 1947 aerial photograph, the octagonal building was demolished and the space was used to expand the existing used car sales lot associated with 740 La Brea Avenue.

In 1961, 724 La Brea Avenue was sold to Murphy Oldsmobile Company. Based on the building permit described above, it appears that Murphy Oldsmobile had leased the property since at least 1945. With this purchase, Murphy Oldsmobile Company created a continuous property that included 716, 724, and 740 La Brea Avenue (Lots 101–109). This property was sold by Murphy in 1984 to Metroplaza Partners.

Metroplaza Partners owned the property when it was redeveloped as part of the Metroplaza Mall that currently occupies the site. Today, the former 724 La Brea property is occupied by a portion of the two-part mini-mall and surface parking lots. The general shape of the existing building suggests that it may be the original “repair garage” that has been retrofitted for retail use.

716 La Brea Avenue (Lot 101)

An aerial photograph from 1948 shows several buildings at 716 La Brea Avenue, one of which is shown to be used for real estate. These same buildings appear on the 1950 Sanborn Fire Insurance Map where their use is shown as “store,” “auto” and “auto repair.” One of these buildings may have been the “used car lot office” that was described in a building permit submitted by C.B. Murphy in 1952.

Deed research indicates that this property was acquired by Clifford B. Murphy, the owner of Murphy Oldsmobile Co., sometime prior to 1948.

A 1967 aerial photograph shows only the rear building. It is assumed that this building was removed when the property was redeveloped by Metroplaza Partners as Metroplaza Mall. Today, the former 716 La Brea Avenue property is occupied by the free-standing northernmost building of the mini-mall complex that was constructed circa 1984.

740 La Brea Avenue (Lots 107 and 109)

The primary building on the project site, formerly Murphy Oldsmobile (740 La Brea Avenue), was constructed as a two-story public garage and show room in 1945 by Clifford B. Murphy, Sr. Construction of the main showroom and garage building appears to have closely coincided with construction of the smaller buildings at 716 and 724 La Brea Avenue described above.

Clifford B. Murphy, Sr. was a second-generation automobile dealer. Advertisements in the Los Angeles Times indicate that his father, Walter Murphy, owned and operated an automotive center at 420 La Brea Avenue, several blocks north of Wilshire Boulevard. Murphy's son, Clifford Jr., was also engaged in the automobile business. After training at his father's dealership at 740 La Brea Avenue, Clifford Jr. acquired his own dealership in San Francisco in 1952.

As previously noted, Clifford B. Murphy acquired the property sometime prior to 1948 and sold it in 1981. In 1984, the property was sold to Metroplaza Partners. With this purchase, Metroplaza Partners consolidated all of the lots along the east side of La Brea Avenue between West 8th Street and the alley at the rear of the properties fronting on Wilshire Boulevard.

At the same time of this property transfer, building permits were issued to Metroplaza Partners for demolition of interior partitions at 740 La Brea Boulevard. The current and proposed use of the building was noted as an auto dealership and garage. A subsequent permit for interior and exterior remodeling and additions, including a partition, stairs, ramp, storefront and "1 hr corridor to La Brea" was also issued. A number of other building permits were issued from March to May, 1984. However, the permit that appears to most significantly document alterations to the building is from September 1984. This permit documents the exterior and interior renovation and expansion of the existing building for conversion from its present use as a car dealership to a new use as retail shops.

In 1987, a building permit was issued to Cyril E. Good for "new kitchen improvements, partitions, ceilings, toilet rooms and change use" from retail to restaurant at 740 La Brea Avenue. This appears to have been related to the tenant space fronting on La Brea, which is listed in City Directories as "Gastons" (1990) and "Café La Brea" (1995 and 2000). A balloon awning over one of the storefronts still advertises the later business. In 1993, a building permit was issued to include a dance hall accessory to the restaurant at 740 La Brea Avenue.

Metroplaza Partners sold the property in 2005. The project proponents acquired the property in January 2007. The former auto dealership building (740 La Brea Avenue) is currently occupied by a restaurant, a gymnasium, offices, and several retail tenants.

Exterior

The primary building on the site fills its parcel, is a rectangle in plan, and has a two-story, flat-roofed front section, and a one-story rear section with a bowstring truss roof. The wood-frame building is clad with stucco and has piers scored to resemble blocks, a stacked parapet, and two large billboards attached to the roof. The west (front) façade evinces several motifs characteristic of Streamline Moderne architecture with a horizontal band above the second floor windows, a curving and canted façade, and a vertical pylon. The double-height entrance is slightly off-center and is set within the canted wall. On either side of the entrance are large storefront bays resting on low bulkheads. The storefronts are filled with opaque metal panels and grilles. The two north bays also contain contemporary metal and glass doors. A balloon awning covers one of the storefronts. The second floor is fenestrated by two window openings with a mixture of glass block and multi-light, slider sash. The head of the windows projects to form a continuous band across the façade and returns around the south side of building. The angular pylon supports letters reading vertically, "METROPLAZA," and is topped by streamlined cooling fins and a finial.

The south elevation is covered by the adjoining building. The north elevation is fenestrated on the first floor with several storefronts under canopies. Signage for each business is installed in a stepped sunburst arrangement that rests on top of the canopy. The parapet steps down as it goes from the front to the rear of the building.

Interior

Contemporary storefront doors access the front tenant space (the current occupant is a karaoke bar and restaurant) entrance vestibule. North of the vestibule a corridor leads to private karaoke rooms with carpeted floors and corrugated sheet metal ceilings. South of the vestibule is a large room with a bar and restaurant booths. Mechanical equipment, fans, light fixtures, and audio visual equipment are suspended from the acoustical tile clad ceiling. A raised platform at the south end of room serves as a stage. The bar, at north end of room, is tucked under an original winding stair with a balconet landing and curving metal handrail. This stair appears to be the only feature original to the space. The stair leads to a series of corridors with additional karaoke rooms similar to those describe above.

There are entrances to the rear tenant space (the current occupant is a boxing gymnasium) from the north and east. The interior floor level is below grade, requiring a ramp or stairs at each entrance. The interior is largely a free-span space with the exposed bowstring truss. Several skylights provide natural light. Walls are painted concrete block/brick and floors have contemporary coverings. Along the south end of the space are several enclosures containing restrooms and locker rooms.

The other buildings on the site are one-story, wood-frame and painted concrete masonry unit, clad in stucco with flat roofs behind stepped parapets. Abstract sunbursts are symmetrically arranged along the edge of the parapet. A continuous canopy with decorative banding at front edge hangs over the storefronts. Signage for each retail space is arranged within a simplified sunburst that is attached to the roof of the canopy. Scored piers divide the contemporary metal and glass storefronts. The north building is free-standing, rectangle in plan with a curved west façade highlighted by a vertical pylon. The rectangular center building, which abuts the north elevation of the primary building, is a long, relatively narrow structure. The L-shaped, south building has two curved wall elements.

Retail spaces are finished with contemporary materials including suspended ceilings, vinyl tile, carpet, and drywall demising walls.

A low concrete and glass block wall separates the surface parking lots from the public sidewalk.

Alterations

Review of City of Los Angeles Building Permits indicates that the former 740 La Brea Avenue building has been altered with the most significant changes occurring in the 1980s when it was converted from an auto showroom and garage to retail uses. This work included removal and relocation of interior demising walls, addition of new storefront entrances on front (west) façade, replacement of signage on front façade, installation of canopy along north elevation, and new construction along south elevation. Other changes to the building include: addition of two, large billboards on the roof (date unknown – likely added in 1960s), removal of large showroom windows and replacement with metal panels and grilles (date unknown), installation of balloon awning and new signage on west façade, and reapplication of stucco cladding (date unknown).

c. Adjacent Properties

A number of buildings adjacent to the project site have been evaluated to determine if they are historic resources. The locations of the buildings in the vicinity of the project site are shown in **Figure IV.C-1, Potential Historical Resources On and In the Vicinity of the Project Site.**

5217 Wilshire Boulevard, E. Clem Wilson Building (Mutual of Omaha)

Located at the northeast corner of Wilshire Boulevard and La Brea Avenue, the former E. Clem Wilson building is north of the project site on the opposite side of Wilshire Boulevard. Built in 1929, this is a 12-story Art Deco-style building with a Streamline Moderne base and Zigzag Moderne tower with a variety of setbacks.

When it was built by E. Clem Wilson, a real estate investor, based on designs by architects Meyer & Holler, this building was the tallest on the Miracle Mile. Located and designed to take advantage of passing automobile traffic at the busy corner of Wilshire Boulevard and La Brea Avenue, the first three floors, or base, display the horizontal orientation of Streamline architecture with smooth rounded corners. Although the original, double-height display windows that once wrapped around the entire base have been altered (date unknown), the building retains a striking presence.

The tower, which steps up at varying intervals, displays more Zig Zag ornamentation, including square corner posts decorated with circles and angles that extend beyond the roof line at the stepped levels. A number of these decorative corner posts have been removed (date unknown) and a large, contemporary metal sign was wrapped around the top floor of the building sometime in the 1960s (this feature may have been replaced more recently). The building is currently occupied with ground floor retail and offices on upper floors.

Although this stepped profile culminating in a tower is typical of Art Deco high rises, it is also achieved several key outcomes, typical of large office buildings built along Wilshire Boulevard in this period. First, the stepped tower over the larger square footage base ensured that office suites would have ample access to light and air. Second, the large base allowed for numerous retail tenants or for one flagship tenant with large square footage requirements. Third, and perhaps most importantly, the combination of base and tower made the building visible to approaching and passing motorists.

The architectural firm of Meyer & Holler, comprised of Mendel Meyer (1874–1955) and Philip W. Holler (1889–1942), was a successful Los Angeles-based, design-build organization. Information about the firm principals is scant as neither Meyer nor Holler appears to have had a formal architectural education. Meyer, a native of Los Angeles, was with the Milwaukee Building Company and its successor concern, Meyer & Holler.

Incorporated in 1906, the Milwaukee Building Company advertised itself as providing architectural designers, architectural engineers, and contractors. Meyer & Holler (as the Milwaukee Building Company) initially emphasized domestic work before switching to commercial work after World War I. By the mid 1920s, Meyer & Holler had become one of the “largest building firms in Los Angeles.” The firm, which designed and built such notable Los Angeles buildings as the Getty House (City of Los Angeles Mayor’s official residence – 1920), Grauman’s Egyptian Theater (1922 – Historic-Cultural Monument #584), Hollywood Athletic Club (1925), Fox Fullerton Theater (1925), Grauman’s Chinese Theater (1927 – Historic-Cultural Monument #55), and the Hollywood branch of 1st National Trust and Savings Bank (1928), also “built movie studios and residences for many elite members of Southern California society, including Harry Chandler, Edward L. Doheny, Hal Roach, Samuel Goldwyn, Charlie

Chaplin, and King Vidor.” Architecture librarian Alfred Willis asserts that Meyer & Holler’s success may be attributed to “offering of architectural design services of unusually high level of quality...as a result of hiring some of the finest design talent available in southern California in the 1910s and 1920s.” One such talent appears to have been Raymond McCormick Kennedy (1891–1976), who, after attending Cornell University and at the American Academy in Rome, joined Meyer & Holler in 1920 and designed many of the firm’s most well-known buildings.

5207–5209 Wilshire Boulevard, Security Pacific Bank (Security-First National Bank)

5207–5209 Wilshire Boulevard, the former Security Pacific Bank, is located mid block on the north side of Wilshire Boulevard between Sycamore and La Brea Avenues. The building is north of the project site on the opposite side of Wilshire Boulevard.

The two-story building was designed by Los Angeles-based architecture firm Morgan, Walls & Clements and constructed in 1929 for Security-First National Bank. A building permit was issued in March 1929 to Security-First National for construction of a two story bank building to be clad in concrete and terra cotta. Designed as a branch bank, the distinctive black and gold terra cotta clad, Zig Zag Moderne structure, won a design award from the American Institute of Architects in 1930. Large, stepped columns reach to the roof line and border each side of the façade. Four smaller, equally spaced columns are also present. Ornamental details include metal cutwork above the windows and zig zag patterned rectangular panels above the doors.

At one time, metal letters spelling out “SECURITY-FIRST NATIONAL BANK OF LOS ANGELES” were mounted to the front of the building, just below the parapet. The building also featured a large roof-mounted neon sign advertising the bank; these signs were removed at an unknown date. The building is currently occupied by offices.

Los Angeles-First National Trust and Savings Bank, opened in 1875, and Security Trust and Savings Bank, established in 1889, combined to form Security-First National Bank in 1929. This merger created what was at the time the eighth largest bank in the United States. Security-First National Bank, after several additional mergers, became known as Security Pacific National Bank and has more recently been absorbed into other banking enterprises through several subsequent mergers.

The architecture firm of Morgan, Walls & Clements, in partnership from 1923 to 1937, consisted of Octavius W. Morgan (1884–1966) and Stiles O. Clements (1884–1966). The firm sprang from the partnership of Ezra F. Kysor (1935–1907), a pioneering Los Angeles architect, and Octavius Morgan (1850–1922), which began in 1878. Upon retirement of Kysor in 1888, Morgan formed a partnership with John A. Walls (firm then known as Morgan & Walls), later taking his son, Octavius W. Morgan, into the

firm in 1910. Notable buildings by Morgan, Walls & Morgan from this period include: Farmer's & Merchants Bank (1906), W.P. Story Building (1908), Hellman Building (1910), I.N. Van Nuys Building (1912), Santa Fe Building (1916), and Pacific National Bank (Coast Federal Savings Building – 1925).

Shortly after the deaths of Morgan senior and John Walls in 1922, Stiles O. Clements, a talented architect trained at Massachusetts Institute of Technology, who had previously worked for the firm as a designer sometime between 1911 and 1913, was hired as a partner and the name of the firm was changed to Morgan, Walls & Clements. During Clements' tenure, the firm designed a number of significant buildings in Los Angeles, including Pellisier Building/Wiltern Theater (1930–1931), Richfield Building (1928 – demolished 1969), Mayan Theater (1927), Dominguez-Wilshire Building (1930), and Samson Tyre and Rubber Company complex (1929). The firm also found several repeat clients, designing at least 16 markets for Ralph's Grocery Company, 32 bank projects for the Bank of Italy (Bank of America), and a number of branch banks for Security-First National Bank. Clements also oversaw changes in the firm's design vocabulary, moving from period-revival examples toward the Streamline and Zig Zag Moderne expressions of Art Deco. Morgan retired in 1937 and Clements renamed the firm, Stiles O. Clements, Associated Architects and Engineers (1937 to 1955). As one of the oldest, most prestigious, and possibly most productive architectural firms in Los Angeles history, there are numerous extant examples of both its major and minor commercial buildings.

5201 Wilshire Boulevard, Jack in the Box

5201 Wilshire Boulevard is located on the northwest corner of Sycamore Avenue and Wilshire Boulevard across the street from the project site. This is a one-story, contemporary building built in 1997 for the Jack in the Box fast-food chain.

5174 Wilshire Boulevard

5174 Wilshire Boulevard is located on the southeast corner of Sycamore Avenue and Wilshire Boulevard across the street from the project site. This one-story, L-shaped, mini-mall building, built in 1984, is arranged around a surface parking lot.

711 La Brea Avenue, Bank of America

711 La Brea Avenue is located on the southwest corner of La Brea Avenue and Wilshire Boulevard across the street from the project site. A one-story, masonry building that is square in plan and has a flat roof. East and north elevations are treated as primary façades each with an inset entry and string of metal and glass windows with dark tinted glazing. The northeast corner of the building is clipped at street level and there is a metal pole sign extending from north edge of roof.

735–739 La Brea Avenue, former Wilshire-La Brea Recreation Center

735–739 La Brea Avenue is located mid block on the west side of La Brea across the street from the project site. Constructed in 1938 as a bowling alley, it is a two-story, masonry building, roughly rectangular in plan. In the center of the east primary façade is a double-height entrance highlighted by curved, fluted pilasters framing metal and glass doors under a slight, metal trimmed canopy. Above the doorway is a large plaster framework interspersed with metal grilles. On either side of this entrance, a shallow, curved, metal-trimmed canopy extends across the façade. Below this canopy, the wall is clad with slate tile and there are several contemporary, inset entrances and fixed, metal sash windows. At the south bay, the entrance is framed similar to the center bay. The second floor is clad with textured stucco and is largely devoid of fenestration except for an elongated octagonal window above the south bay. There are several incised stringcourses at head height of window and center entrance bay and the parapet is highlighted by projecting stringcourses and a reeded molding.

Research indicates that the Wilshire-La Brea Recreation Center was constructed in 1938 for use as a bowling alley by O & F Thum Properties based on design by Charles Kyson. Charles H. Kyson (1883–1954), the son of pioneering Los Angeles architect, Ezra Kysor, designed a number of residences, generally in popular Period Revival styles, as well as several administration buildings at Forest Lawn Cemetery. Kyson also served on board of directors of the Architects' League of Hollywood in 1920s.

The 1927 Sanborn map and several historic photographs indicate that prior to construction of the bowling alley there was nothing of any size on the site. Numerous mentions of the center are made in articles throughout the 1940s and early 1950s noting league play, tournaments, and news items such as actor Harold Lloyd bowling a perfect (300) game. It is not known when bowling use ended, however, advertisements in the *Los Angeles Times* as such extend until at least 1958. The building is currently used as a dance academy and offices.

Although no historic photographs of the building have been located, examination of the exterior suggests significant alteration to the principal façade. While some remnants of the original Streamline Moderne architecture remain, including the metal-trimmed canopies, center entrance, and elongated octagonal window, the entire façade has been reclad and all ground floor fenestration significantly altered. It seems likely that second floor fenestration has also been altered.

747 La Brea Avenue, AmeriPros Auto Body

747 La Brea Avenue is located mid block on the west side of La Brea across the street from the project site. Review of Sanborn maps and historic aerial photographs indicates that the one-story L-shaped masonry building was constructed sometime between 1927 and 1949. The front façade has a large opening between

fluted piers, likely for an original showroom window, which is overpainted and infilled. The main entrance is canted at an angle at northeast corner of building. The upper portion of building is covered in contemporary sheet metal cladding that extends along both the east and north elevations. A corrugated sheet metal, shed roof porch extends along the north elevation.

A 1949 aerial photograph indicates that the building originally had a tall pylon rising from the northeast corner. The 1950 Sanborn map shows that the building was used as an auto sales and service facility. Advertisements in the *Los Angeles Times* show that the property was used as a used-car dealership of Ray F. Chesley in 1935. By the late 1930s, the property was occupied by R.L. Lail & Co. sellers of used Chevrolets and Oldsmobiles, and in the mid 1940s through 1950s, it appears to have been known as the Packard-La Brea dealership. In the 1969 aerial photograph, the original pylon has been removed. The building is currently used as an auto-body repair shop.

Although no ground-level historic photographs of the building have been located, examination of the exterior suggests significant alteration to the principal façade. While there are some minimal remnants of the original Streamline Moderne architecture, including the fluted piers and canted, corner entrance, most of the façade has been re-clad and all fenestration significantly altered.

757 La Brea Avenue

757 La Brea Avenue is located on the northwest corner of La Brea Avenue and West 8th Street across from the project site. Constructed in 1925, it is a two-story, masonry building, roughly rectangular in plan with two primary façades (east and south) clad in smooth stucco. The building meets the corner at an angle. At ground floor, the corner bays are occupied by contemporary storefronts resting on a low bulkhead and by an inset door with transom. Storefront bays at corner and on east elevation are separated by fluted piers. Additional storefronts on both elevations are contemporary; three bays on south elevation are occupied by roll-up garage doors. The second floor is fenestrated with asymmetrically arranged windows; some bays are highlighted by slightly projecting piers with chevron motif. Windows on east elevation are casement sash, while south elevation has double-hung sash in a variety of configurations. There is a simple stringcourse above second story windows and the parapet has a slightly scalloped profile. Several metal blade signs project from the second story and there are contemporary awnings over two storefronts.

According to the original building permit, 757 La Brea Avenue was constructed in 1925 for apartments and stores with Ray Myers as architect and Myers Brothers as contractor. Ray A. Myers (1894–1976), the son of the founder of the Myers Brothers Construction company, worked for the company and also

served as board chairman. This company, which became one of the largest construction companies in southern California, was incorporated in 1952.

The building appears on the 1927 Sanborn map where it is shown as subdivided into three stores, an art studio, and a restaurant. Additional detail is provided in the 1935 aerial photograph where the south elevation is visible.

Although no ground-level historic photographs of the building have been located, examination of the exterior suggests significant alteration to the principal façade. While there are some remnants of the original Zig Zag Moderne architecture, including the fluted piers, angled, corner entrance and chevron decoration, fenestration has been altered, most significantly at the ground level storefronts.

800 La Brea Avenue, Firestone Tire and Rubber

800 La Brea Avenue, the Firestone Tire retail store, is located on the southeast corner of La Brea Avenue and West 8th Street on the opposite side of 8th Street from the project site. Constructed in 1937, it is a one-story, masonry building, roughly square in plan with a bowstring truss roof and two primary facades (north and west) clad in porcelain enamel panels. Built in the Streamline Moderne style, a curved wall at northwest corner of building creates a continuous elevation of the north and west façades. These elevations are broken by large, open bays for auto access and by strings of metal and glass storefront windows (the windows also curve at northwest corner of building). The front (west) façade is highlighted by a distinctive, cantilevered overhang that abuts the building's south wall and adjacent building. The corbelled underside of overhang is highlighted by curved rows of neon light fixtures. A large, bow tie-shaped, metal pole sign reading "Firestone" is affixed atop the canopy, while individual metal box letters spelling out "Firestone" and "Complete Car Service" are attached at top of roof edge on both north and west façades. Aerial photographs indicate that there are several rectangular skylights in roof of building.

Firestone received a building permit for the new store in September 1937. This permit was issued for construction of a "public garage" at 800 La Brea Avenue. R.E. Ward was noted as engineer on project. No architect was included on the permit. Subsequent permits were issued in 1938 for installation of "roof sign" and "neon letters on roof."

The building does not appear to have been much altered over the years. There is only one building permit dating from after the initial construction phase; this permit, from 1962, is for a roof sign addition. While other alterations may have occurred, they are not documented in recorded permits. The building appears in aerial photographs after 1937 with a footprint that does not appear to have been altered based on review of later aerial views, such as a 1962 image.

d. Potential Historic Preservation Overlay District

Located on the blocks east and south of the project site is a residential neighborhood of early 20th century Period Revival residential buildings. Buildings are a combination of single- and multi-family residences that are one or two stories in a combination of Period Revival styles popular in Los Angeles in the 1920s and 1930s. These styles include: Spanish Colonial, Mission, Tudor, and Provincial revivals. On each of the north-south streets, the building type and size alternates. For instance, Sycamore Avenue contains two-story, multi-family buildings while Orange Avenue is exclusively one-story, single-family structures. This pattern continues as one goes east to Highland Avenue. Based on overall integrity, the neighborhood appears to be a distinctive grouping of Period Revival, single- and multi-family residential buildings dating from the mid 1920s to mid 1930s that appears eligible for listing as a California Register historic district. The potential district is roughly bounded by Wilshire Boulevard, Highland Avenue, Olympic Boulevard, and La Brea Avenue. The location of the potential district in relation to the project site is shown in **Figure IV.C-1, Potential Historical Resources On and In the Vicinity of the Project Site**.

The core of the district appears to be the blocks of Orange, Mansfield, and Citrus Avenues closest to 8th Street. As one moves away from this core area, integrity and contemporary intrusions become more pervasive. There are also both private and public schools located along Olympic Boulevard at the south end of the potential district which are excluded from the boundary.

A summary of those buildings in the 700 block of Sycamore that are contributors and non-contributors to the potential district is provided in **Table IV.C-1, Summary of Contributors to Potential Adjacent Historic District**. Research of the buildings on the 700 block of Sycamore Avenue (see **Table IV.C-1**) indicates that the majority were constructed in the 1920s with only 750 Sycamore Avenue and 724 Sycamore Avenue built later; 750 Sycamore Avenue was constructed in 1937 while 724 Sycamore Avenue was not built until the 1970s or 1980s. Original building permits indicate that all were constructed to accommodate two families with private garages at the rear of each lot. Most of the original permits identify an architect of record with the most notable being Paul R. Williams. Williams, a Los Angeles-based, African-American architect known for period revival residential and commercial buildings, is listed as architect for 756 Sycamore Avenue.

**Table IV.C-1
Summary of Contributors to Potential Adjacent Historic District**

Address	Construction date	Original owner	Architect	Contractor	Contributor
720 S. Sycamore	1929	Susan Breed	R.D. Jones	S.M. Cooper	Yes
724 S. Sycamore	c. 1970	NA	NA	NA	No
728 S. Sycamore	1926	W.H. Shoemaker	McConville & Perryman	L. McConville	No
736 S. Sycamore	1924	Samuel and Ella Wood	Angelus Architectural Services Co.	Samuel L. Wood	Yes
738 S. Sycamore	1923	W.C. Fleury	NA	H. B. Dailey	Yes
744 S. Sycamore	1924	W.J. Hubbard	R.W. Felix	Al Nelson	Yes
750 S. Sycamore	1937	Louis Handelsman	J.A. Larralde	NA	No
756 S. Sycamore	1929	Yachel Del Valle Crain	Paul R. Williams	Garnet Tyler	Yes

Source: Chattel Architecture, Planning and Preservation, Inc., August 28, 2007.

e. Miracle Mile Historic District

The National Register-eligible and California Register-listed Miracle Mile Historic District, situated along Wilshire Boulevard, west of La Brea Avenue and east of Burnside Avenue, is comprised of 19 contributing structures constructed in the 1920s and 1930s, all Art Deco in style. The building at 5220 Wilshire Boulevard was constructed in 1965, roughly 30 years outside the period of significance for the nearby district. The location of the Miracle Mile Historic District in relation to the project site is shown in **Figure IV.C-1**.

3. REGULATORY FRAMEWORK

a. National Register of Historic Places

The National Register of Historic Places (National Register) is the Nation's master inventory of known historic resources and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Authorized under the National Historic Preservation Act of 1966, as amended, the National Register is part of a national program to coordinate and support public and private efforts to identify,

evaluate, and protect the country's historic and archaeological resources. The National Register is administered by the National Park Service (NPS), which is part of the US Department of the Interior.

As defined in National Register Bulletin #15, "How to Apply the National Register Criteria for Evaluation," four criteria provide the basis under which a structure, site, building, district, or object can be considered significant for listing on the National Register. A potential resource needs to meet only one of the four criteria to achieve significance. The criteria include resources that:

- (A) Are associated with events that have made a significant contribution to the broad patterns of history (such as a Civil War battlefield or a Naval Ship building Center);
- (B) Are associated with the lives of persons significant in our past (such as Thomas Jefferson's Monticello or the Susan B. Anthony birthplace);
- (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 (such as Frank Lloyd Wright's Taliesin or the Midwestern Native American Indian Mounds); or
- (D) Have yielded or may likely yield information important in prehistory or history (such as prehistoric ruins in Arizona or the archaeological sites of the first European settlements in St. Augustine, Florida or at the Presidio of San Francisco).

Once a potential resource is determined to have met one of the four criteria, its significance should be evaluated within its historic context or historical pattern relevant to a particular geographic area. Historic contexts are found at a variety of geographical levels or scales, specifically the local, state, or national level. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area.

Once a resource has been determined to satisfy one of the above-referenced criteria, then it must be assessed for "integrity." Integrity refers to the ability of a property to convey its significance, and the degree to which the property retains the identity, including physical and visual attributes, for which it is significant under the four basic criteria. To retain its historic integrity, a property must possess several, and usually most, of these aspects. The National Register recognizes seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

The seven aspects of integrity are defined below.

- Location: Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design: Design is the combination of elements that create the form, plan, space, structure, and style of a property.

- **Setting:** Setting is the physical environment of an historic property, constituting topographic features, vegetation, manmade features, and relationships between buildings or open space.
- **Materials:** Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form an historic property.
- **Workmanship:** Workmanship is the physical evidence of the crafts of a particular culture, people, or artisan during any given period in history or pre-history.
- **Feeling:** Feeling is a property's expression of the aesthetic or historical sense of a particular period of time.
- **Association:** Association is the direct link between an important historic event or person and an historic property.

b. California Register of Historical Resources

The California Register of Historical Resources (California Register) is the authoritative guide to the state's significant historical and archeological resources (PRC Section 5024.1). It serves to identify, evaluate, register, and protect California's historical resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for historic preservation grant funding, and affords certain protections under the California Environmental Quality Act (CEQA). All resources listed on or formally determined eligible for the National Register are automatically listed on the California Register. In addition, properties designated under municipal or county ordinances are also eligible for listing in the California Register.

The California Register criteria are modeled on the National Register criteria discussed above. An historical resource must be significant at the local, state, or national level under one or more of the following criteria:

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

In addition to meeting one of the four above criteria, California Register-eligible properties must also retain sufficient integrity to convey historic significance. California Register regulations contained in Title 14, Chapter 11.5, Section 4852 (c), provide that “it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register.” The California Office of Historic Preservation (OHP) has consistently interpreted this to mean that a property eligible for listing in the California Register must retain “substantial” integrity.

The California Register automatically includes the following:

- California properties listed or formally determined eligible for listing in the National Register of Historic Places;
- California Registered Historical Landmarks from #0770 onward; and
- California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion in the California Register.

The California Register also includes properties which are City and county-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with California Register criteria). PRC Section 5024.1 states:

- (g) A resource identified as significant in an historical resource survey may be listed in the California Register if the survey meets all of the following criteria:
- (1) The survey has been or will be included in the State Historical Resources Inventory.
 - (2) The survey and the survey documentation were prepared in accordance with [OHP]... procedures and requirements.
 - (3) The resource is evaluated and determined by the office to have a significance rating of category 1-5 on DPR [Department of Parks and Recreation] form 523.
 - (4) If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

Other resources may be nominated for listing in the California Register based on the criteria stated above.

c. California Environmental Quality Act

Section 21084.1 of the Public Resources Code provides the framework for determining whether a property is a historic resource for CEQA purposes. Historic resources that are listed in or eligible for listing in the California Register of Historical Resources; that are per se significant other resources; that are officially designated on a local register; or that are found to be significant by the State Historic

Preservation Officer (SHPO) under Section 5024.1(j) of the Public Resources Code are presumed to be significant. According to CEQA, in determining potential impacts on historical resources under CEQA, projects are reviewed according to the Secretary of the Interior's Standards. A "substantial adverse change" means "demolition, destruction, relocation, or alteration of the resource such that the significance of a historical resource would be materially impaired." The setting of a resource should also be taken into account in that it too may contribute to the significance of the resource, as impairment of the setting could affect the significance of a resource. Material impairment occurs when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

To simplify the first three definitions provided in the CEQA statute, an historical resource is a resource that is

1. Listed in the California Register of Historical Resources (California Register, or CRHR);
2. Determined eligible for the California Register by the State Historical Resources Commission; or
3. Included in a local register of historical resources.

Section 15064.5 of the *State CEQA Guidelines* further supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. An historical resource is a resource that is

4. Identified as significant in an historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g);
5. Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

CEQA regulations identify the Secretary of the Interior's Standards as a measure to be used in determinations of whether or not a project of new development or rehabilitation adversely impacts an "historical resource." Section 15064.5(b)(3) states:

"Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

Section 15064.5(a)(4) of the State CEQA Guidelines states:

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

d. The Secretary of the Interior's Standards for Rehabilitation

Evolving from the *Secretary of the Interior's Standards for Historic Preservation Projects with Guidelines for Applying the Standards* that were developed in 1976, the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* were published in 1995 and codified as 36 CFR 67. Neither technical nor prescriptive, these standards are "intended to promote responsible preservation practices that help protect our Nation's irreplaceable cultural resources."² "Preservation" acknowledges a resource as a document of its history over time and emphasizes stabilization, maintenance, and repair of existing historic fabric. "Rehabilitation," while also incorporating the retention of features that convey historic character, also accommodates alterations and additions to facilitate continuing or new uses. "Restoration" involves the retention and replacement of features from a specific period of significance. "Reconstruction," the least-used treatment, provides a basis for recreating a missing resource. These standards have been adopted, or are used informally, by many agencies at all levels of government to review projects that affect historic resources.

As discussed above, CEQA regulations identify the Secretary of the Interior's Standards as a measure to be used in determinations of whether or not a project of new development or rehabilitation adversely impacts an "historical resource." The Secretary of the Interior's Standards state:

² Weeks, Kay D. and Anne E. Grimmer. 1995. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction Historic Buildings*. Washington D.C.: US Department of the Interior, National Park Service.

1. A property shall be used as its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of distinctive materials or alteration of features, and spaces that characterize a property shall be avoided.
3. Each property shall 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 architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall 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 other visual qualities and, where possible, materials. Replacement of missing features will be substantiated by documentary, physical or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Infill and redevelopment projects that could affect historic resources may be subject to review based on Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, which state:

9. New additions, exterior alterations or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction shall 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.

Therefore, in determining the impact of a project on an "historical resource," CEQA regulations require the application of the Secretary of the Interior's Standards to the question of whether the project results in a substantial adverse change to the resource and in particular those physical characteristics or character-defining spaces and features that convey its historical significance.

While compliance with the Secretary's Standards indicates that a project may have a less than significant impact on an historical resource, the converse of this does not hold. Failure to comply with the Secretary's Standards is not, by definition, a significant impact under CEQA. CEQA recognizes that alterations that are not consistent with the Secretary's Standards may still not result in significant impacts on the historical resource. Therefore, the significance of project impacts on an historical resource can be evaluated by determining:

- Whether a project is in conformance with the Secretary's Standards (less than significant impact);

- Whether a project is in substantial conformance with the Secretary's Standards and does not result in material impairment (less than significant impact); or
- Whether a project is not in conformance with the Secretary's Standards and results in material impairment (significant impact).

The above criteria are important not only in determining whether the project would have a significant cultural resource impact but also in considering effective mitigation and alternatives.

e. City of Los Angeles Historic-Cultural Monument

There are two principal categories of local designation for historically significant properties in Los Angeles. Properties may be designated as Historic-Cultural Monuments (HCM) and/or may be included in Historic Preservation Overlay Zones (HPOZ). Historic-Cultural Monument designation is reserved for individually significant properties.

An HCM is defined in Cultural Heritage Ordinance Section 22.130, as

“Any site (including significant trees or other plant life located thereon), building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites in which broad cultural, political, economic, or social history of the nation, state, or community is reflected or exemplified or which are identified with historic personages or with important events within the main currents of national, state or history, or which embodies the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age.”

The Los Angeles City Council designates HCM on recommendation of the Cultural Heritage Commission. Listing as an HCM is subject to review by the Cultural Heritage Commission and the Arts, Health, and Humanities Committee of the City Council, and requires approval by the City Council. Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for local landmark status if they retain their original design and materials. Those that are quality samples of past architectural styles or that have historical associations may meet the criteria in the Cultural Heritage ordinance.

The HPOZ Ordinance was adopted by the City of Los Angeles in 1979, and revised in 1997. As defined in the Cultural Heritage Masterplan Review Draft (March 7, 2000, Cultural Heritage Masterplan), an HPOZ is, “...a planning tool which recognizes the special qualities of areas of historic, cultural, or architectural significance. An HPOZ does not change the underlying zoning, rather it lays an added level of protection

over a zone through local board oversight.”³ There are fifteen designated historic preservation overlay zones in Los Angeles, incorporating more than 4500 properties. The Cultural Heritage Masterplan defines HPOZ criteria for evaluation as follows:

“Structures, natural features, or sites within the involved area, or the area as a whole, shall meet one or more of the following:

- A. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possess historic integrity reflecting its character at that time.*
- B. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or City.*
- C. Retaining the structure would help preserve and protect an historic place or area of historic interest in the City.”*

Properties that are designated as HCMs or contributors to designated HPOZs are presumed to be historically or culturally significant and are therefore considered historical resources under CEQA.

4. IDENTIFICATION OF HISTORICAL RESOURCES

An evaluation of the resources on the project site, adjacent to the project site and in the vicinity of the project site vicinity to determine if any are historic resources as defined by CEQA is provided below. The identification of historical resources is provided in advance of the evaluation of project impacts to establish whether or not the resources qualify as historic resources, per Section 21084.1 of the Public Resources Code.

a. Project Site

Wilshire Grace Church

California Register

To determine the building’s individual eligibility for listing in the California Register, it was assessed under all four California Register criteria.

Criterion 1

Constructed in the mid 20th century by the Columbia Savings and Loan Association, the building served as a financial institution for approximately 30 years. One of many savings and loan institutions in Los

³ Cultural Heritage Masterplan Review Draft, March 7, 2000.

Angeles during the period, Columbia Savings and Loan Association does not appear to have been particularly significant nor does it appear to have played a leading role in the history of banking in Los Angeles. As such, 5220 Wilshire Boulevard is not associated with events that have made significant contributions to the broad patterns of California's history and cultural heritage and, therefore, is not eligible for listing in the California Register under criterion 1.

Criterion 2

Although many individuals have been associated with the building since it was constructed, none of them rise to the level required to warrant consideration under criterion 2: associated with the lives of persons important in our past. Thus, the building is not eligible for listing in the California Register under criterion 2.

Criterion 3

5220 Wilshire Boulevard, the former Columbia Savings and Loan building, appears to have been a competently designed example of a Late Modern commercial building popular throughout the United States in the mid 1960s. The building does not exhibit high artistic value nor can the architect, Irving D. Shapiro, be considered an important creative individual. The building, therefore, does not appear individually eligible for listing in the California Register under criterion 3.

Criterion 4

Finally, the building is not expected to yield information important in prehistory or history as described in criterion 4. Therefore, the building is not individually eligible for listing in the California Register under criterion 4.

Based on the analysis presented above, the Wilshire Grace Church property does not appear individually eligible for listing in the California Register under any of the four criteria.

Miracle Mile Historic District

Based on the age and architectural style of the Wilshire Grace Church property, as well as its location east of the Miracle Mile Historic District boundary, it does not appear to qualify as a contributing resource to the District.

Metroplaza Mall

California Register

Based on research and site visits, the buildings at north and south ends of property and all site features related to the mini-mall at 752 La Brea Avenue were constructed as recently as 1984. Although the portion of the mini-mall that abuts the former 740 La Brea Avenue building to the north is configured in such a way as to suggest that it may be the former “auto services” structure shown in the 1950 Sanborn Fire Insurance Map, it lacks integrity as a result of alterations undertaken for the 1984 mini-mall conversion. Due to their lack of age (not 50 years old) and lack of integrity, these buildings and the site features related to the mini-mall (surface parking lots, concrete wall along La Brea Avenue, and pole sign) are not assessed for potential California Register eligibility.

As the only building with sufficient age and integrity on the Metroplaza Mall site, the former auto showroom and garage at 740 La Brea Avenue was assessed for potential eligibility under all four California Register criteria.

Criterion 1

Constructed in the early-20th century and used as an automobile dealership (currently restaurant and retail), the building appears to have reflected rather than contributed to the development of the nearby commercial center of Miracle Mile along Wilshire Boulevard. From the 1940s through 1970s, the property, like many of its neighbors, appears to have been occupied by automobile-related businesses. While automobiles are an important aspect of southern California and Los Angeles history, the building’s association with this history is not particularly significant as an individual property. Because of this, 752 La Brea Avenue does not have a substantial association with events that have made significant contributions to the broad patterns of California’s history and cultural heritage and, therefore, is not eligible for listing in the California Register under criterion 1.

Criterion 2

Although many individuals have been associated with the Metroplaza Mall site since it was constructed, none of them rise to the level required to warrant consideration under criterion 2, associated with the lives of persons important in our past. While Clifford B. Murphy, Sr. had a long-standing association with the property, he does not appear to have substantially contributed to the history of the nation, state, or city to justify considering him a significant person in our past. None of the subsequent owners appear to have been significant personages in our past. Thus, the property is not eligible for listing in the California Register under criterion 2.

Criterion 3

The original building appears to have been a competently designed example of an Art Deco style commercial building popular in the Miracle Mile area and throughout southern California in the mid 1940s. While it retains elements of its Art Deco influence, including the curved and canted front façade wall and the vertical pylon, these characteristics do not rise to the level of distinctiveness that would lead to the building's individual eligibility under criterion 3. Although it retains some physical characteristics of the Art Deco influence, alterations, including new stucco, removal of windows, and rearrangement of storefronts, has dulled the architectural lines and features. As such, the building is an undistinguished, altered example of a commercial building with Art Deco influences that does not embody distinctive characteristics of the type, period, region, or method of construction that would lead to its individual eligibility. The building does not exhibit high artistic value nor can the architect, Max Maltman, be considered an important creative individual. The building, therefore, is not individually eligible for listing in the California Register under criterion 3.

Criterion 4

Finally, the building is not expected to yield information important in prehistory or history as described in criterion 4. Therefore, the building is not individually eligible for listing in the California Register under criterion 4.

Based on the analysis presented above, the Metroplaza mall property is not individually eligible for listing in the California Register under any of the four criteria.

b. Adjacent Properties***5217 Wilshire Boulevard, E. Clem Wilson Building (Mutual of Omaha)***

The E. Clem Wilson Building has been previously surveyed and assigned a status code of 2S2, or "individual property determined eligible for National Register by consensus through Section 106 process" as a fine example of Art Deco architecture. Properties officially determined eligible for listing in the National Register are automatically listed in the California Register. Therefore, the building is an historic resource as defined by CEQA.

5207–5209 Wilshire Boulevard, Security Pacific Bank (Security-First National Bank)

The former Security-First National Bank is listed in the National Register as an extraordinary example of Art Deco architecture and for its association with notable architect, Stiles O. Clements, and is designated as City of Los Angeles Historic-Cultural Landmark #813. It is one of two extant examples of the black and

gold terra cotta clad buildings modeled after the Richfield Building. As a National Register-listed property and a locally designated landmark, the building is automatically listed in the California Register and is, therefore, a historic resource as defined by CEQA.

5201 Wilshire Boulevard, Jack in the Box

This building and its associated drive-through and surface parking lot replaced two earlier buildings that had been previously surveyed and assigned a status code of “3D,” or “appears eligible for National Register as a contributor to National Register district through survey evaluation.” As the previously surveyed buildings have been demolished and replaced with the current structure, the property is no longer eligible for listing in either the National or California registers under any criteria. Therefore, this building is not a historic resource as defined by CEQA.

5174 Wilshire Boulevard

Based on age and unremarkable architecture, this building is not eligible for listing in the California Register under any criteria. Therefore, this building is not a historic resource as defined by CEQA.

711 La Brea Avenue, Bank of America

Based on age and unremarkable architecture, this building is not eligible for listing in the California Register under any criteria. Therefore, this building is not a historic resource as defined by CEQA.

735–739 La Brea Avenue, former Wilshire-La Brea Recreation Center

The 735–739 La Brea Avenue building does not appear eligible for listing in the California Register because alterations made to the ground floor; removal and replacement of windows and new stucco have caused considerable loss of integrity. Because of this loss of integrity, the property no longer has the ability to convey its original appearance. This property has no known integral associations with significant patterns of events (criterion 1), or important persons (criterion 2), the building does not possess high artistic values (criterion 3) because of exterior alterations, and is not likely to yield important prehistoric or historic information (criterion 4). Therefore, the building is not eligible for listing in the California Register and is not a historic resource as defined by CEQA.

747 La Brea Avenue, AmeriPros Auto Body

The 747 La Brea Avenue building does not appear eligible for listing in the California Register because alterations made to the ground floor; removal and replacement of windows and new stucco have caused considerable loss of integrity. Because of this loss of integrity, the property no longer has the ability to

convey its original appearance. This property has no known integral associations with significant patterns of events (criterion 1), or important persons (criterion 2), does not possess high artistic values (criterion 3) because of exterior alterations, and is not likely to yield important prehistoric or historic information (criterion 4). Therefore, the building is not eligible for listing in the California Register and is not a historic resource as defined by CEQA.

757 La Brea Avenue

The 757 La Brea Avenue building does not appear eligible for listing in the California Register because alterations made to the ground floor; removal and replacement of windows and new stucco have caused considerable loss of integrity. Because of this loss of integrity, the property no longer has the ability to convey its original appearance. This property has no known integral associations with significant patterns of events (criterion 1), or important persons (criterion 2), does not possess high artistic values (criterion 3) because of exterior alterations, and is not likely to yield important prehistoric or historic information (criterion 4). Therefore, the building is not eligible for listing in the California Register and is not a historic resource as defined by CEQA.

800 La Brea Avenue, Firestone Tire and Rubber

This property has no known integral associations with significant patterns of events (criterion 1) or important persons (criterion 2). The building is not likely to yield important prehistoric or historic information (criterion 4).

The building appears to be significant under criterion 3 for its Streamline Moderne architecture and finishes adapted to a utilitarian use. While no information regarding the engineer, R.E. Ward, has been located, the building is notable for its Streamline Moderne architecture and exterior finishes in a building constructed for a utilitarian use (auto repair). The building not only retains substantial physical integrity but also continues in its original use. Although it may not be unique in Los Angeles, it is an outstanding example of a utilitarian building with a distinctive architectural style. Based upon the assessment of the building's history and integrity, it appears that the building embodies distinctive characteristics of a type and period as well as possesses high artistic values and is eligible for listing in the California Register under criterion 3.

In addition, the Firestone Tire and Rubber Co. repair garage also appears eligible for designation as a City of Los Angeles Historic-Cultural Monument. For the reasons stated above, the Firestone repair garage building is a historic resource as defined by CEQA.

c. Potential Period Revival Historic District

The 700 block of Sycamore Street, located opposite the project site, is included in the potential Period Revival historic district although it retains somewhat lower integrity than other parts of the neighborhood due to loss of residential character on the west side of the street (now surface parking lots). This alteration of setting and feeling of the block detracts from the block's overall integrity; nevertheless, the block retains sufficient characteristics to convey the sense of time and place of the potential Period Revival historic district and act as an edge of the district.

The potential district appears to contain a majority of contributing resources built between in the 1920s and 1930s in a variety of Period Revival architectural styles. The district is significant for its concentration of important architectural examples of residential design in early-20th century Los Angeles and as such embodies distinctive characteristics of a type and period for potential eligibility for listing in the California Register under criterion 3.

At this time, the potential district has no known integral associations with significant patterns of events (criterion 1), or important persons (criterion 2), nor is likely to yield important prehistoric or historic information (criterion 4).

Because the potential district is eligible for listing in the California Register, the potential district is considered a historic resource as defined by CEQA.

d. Miracle Mile Historic District

This district, which spans Wilshire Boulevard between La Brea and Burnside Avenues (5320–5519 Wilshire Boulevard), was surveyed in the early-1980s as part of the Los Angeles Rail Rapid Transit Program. As a result of this survey, the Miracle Mile Historic District was identified and assigned a status code of "2S2," or "individual property determined eligible for National Register by consensus through Section 106 process." The 19 contributing resources of the National Register-eligible district are significant as a commercial corridor of Art Deco buildings from the 1920s and 1930s. Properties officially determined eligible for listing in the National Register are automatically listed in the California Register. Therefore, the district is an historical resource under CEQA.

e. Summary of Historic Resources

A summary of the resources on and in the vicinity of the site and a determination regarding their status as potential historic resources is provided in **Table IV.C-2**.

5. ENVIRONMENTAL IMPACT ANALYSIS

a. Significance Criteria

Historical Resources

The following thresholds for determining the significance of impacts related to Historic Resources are contained in the *L.A. CEQA Thresholds Guide*, which was adopted by the City Council in 2006. Impacts related to historic resources are considered significant if the proposed project would:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation or alteration of a significant resource which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

The Initial Study prepared for the proposed project determined that potential impacts to archaeological resources, human remains and paleontological resources would be less than significant, with the inclusion of **MM-CR-1**, **MM-CR-2**, and **MM-CR-3**.

**Table IV.C-2
Identified and Potential Historical Resources**

	Common name/ historic name	Address	Construction date	Surveyed/ Status Code	Evaluation
Project site					
1	Wilshire Grace Church	5220 Wilshire	1965	N/A	Not eligible
2	Metroplaza Mall	752 La Brea	1945, 1984	N/A	Not eligible
Adjacent properties/historical resources					
3	E. Clem Wilson Building/ Mutual of Omaha	5217 Wilshire	1930	2S2	NRE, ^a CRL ^b
4	Security Pacific Bank/ Security-First National Bank	5207–5209 Wilshire	1929	1S	NRL, ^c CRL, HCM ^d
5	Jack in the Box	5201 Wilshire	1997	3D	Not eligible
6	N/A	5174 Wilshire	1984	N/A	Not eligible
7	Bank of America	711 La Brea	1942	N/A	Not eligible

	Common name/ historic name	Address	Construction date	Surveyed/ Status Code	Evaluation
Adjacent properties/historical resources (continued)					
8	Wilshire-La Brea Recreation Center	735 La Brea	1938	N/A	Not eligible
9	AmeriPros Auto Body	747 La Brea	1937/1942	N/A	Not eligible
10	N/A	757 La Brea	1925	N/A	Not eligible
11	Firestone Tire and Repair	800 La Brea	1937	N/A	CRE ^e
Nearby properties/historical resources					
12	Potential Period Revival Residential Historic District	Bounded by Sycamore, Olympic, Highland, and Wilshire	1920–1930	N/A	CRE
13	Miracle Mile Historic District	5318–5514 & 5353–5519 Wilshire	1920s	2S2	NRE, CRL

Source: *Chattel Architecture, Planning and Preservation, Inc., August 28, 2007.*

^a "NRE" – National Register eligible

^b "CRL" – California Register listed

^c "NRL" – National Register listed

^d "HCM" – City of Los Angeles Historic-Cultural Monument

^e "CRE" – California Register eligible

Archaeological Resources

The *L.A. CEQA Thresholds Guide* adopted in 2006 has determined that a project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;

- Is at least 100 years old⁴ and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

Paleontological Resources

The *L.A. CEQA Thresholds Guide* adopted in 2006 requires that the determination of significance be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; or
- Whether the paleontological resource is of regional or statewide significance.

b. Project Impacts

Historical Resources

A substantial adverse change in the significance of an historical resource would occur if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

As discussed above in **3. Regulatory Framework, Subsection c., California Environmental Quality Act**, CEQA regulations identify the Secretary of the Interior's Standards as a measure to be used in determinations of whether or not a project of new development or rehabilitation adversely impacts an historical resource. **3. Regulatory Framework, Subsection d., The Secretary of the Interior's Standards for Rehabilitation**, outlines the Rehabilitation Standards. Rehabilitation Standards 9 and 10 provide a means of assessing potential indirect impacts of new construction on an adjacent historical resource. The

⁴ Although the CEQA criteria state that "important archaeological resources" are those, which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50 years old.

Secretary's Standards state that design for new work in (or adjacent to) an historic district or historic building may be

...contemporary or may reference design motifs from the historic building. In either case, it should always be clearly differentiated from the historic building and be compatible in terms of mass, materials, relationship of solids to voids, scale and color.

Standard 9 requires that new construction be "differentiated from the old" and "compatible" with the historical resource, while Standard 10 requires reversibility. In assessing conformance of the proposed project with the requirements of Standard 9, differentiation from the old is generally achieved through contemporary design and compatibility in a combination of elements. Specifically, new construction projects found to be compatible with historic districts or historic buildings tend to use similar or complementary materials, repeat and/or respect the heights of floors, rhythms and depths of bays, use compatible window/door openings and types, and correspond to roof heights and shapes.

The historic resources assessment, included in **Appendix IV.C** of this draft EIR, examines two areas of potential impacts related to historical resources. The two areas of potential impacts are associated with (1) direct impacts to buildings on the project site; (2) indirect impacts to adjacent historical resources. Potential impacts in these two areas are discussed below.

Direct Impacts

Direct impacts would occur if historical buildings on the project site are impacted as a result of project implementation. The historic resources assessment prepared for the project determined that there are no identified historical resource buildings on the project site. Therefore, no direct impacts related to historic resources would occur with implementation of the proposed project, and no mitigation measures are required or recommended.

Indirect Impacts

Indirect impacts would occur if historical buildings or resources adjacent to or in the vicinity of the project site are impacted as a result of project implementation. While the new project building would be in the vicinity of identified historical resources, the resources are all separated from the project site by public streets of varying widths and the new buildings will not be physically attached to any existing building. In general, CEQA describes an indirect impact is an impact that results from the "...alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

The historic resources assessment prepared for the project determined that there are four historic resources adjacent to the project site that could be potentially impacted by implementation of the proposed project:

- E. Clem Wilson/Mutual of Omaha building at 5217 Wilshire Boulevard. This building is eligible for listing in the National Register and is listed in the California Register;
- Security Pacific Bank/Security First National Bank building at 5207–5209 Wilshire Boulevard. This building is listed in both the National and California Registers, and is a City of Los Angeles Historic-Cultural Monument;
- Firestone Tire and Repair building at 800 La Brea Avenue. This building is eligible for listing in the California Register; and
- Potential Period Revival residential historic district located adjacent to the east and south sides of the project site on Sycamore Avenue and West 8th Street, respectively. This district is eligible for listing in the California Register.

The historic resources assessment prepared for the project determined that no indirect impacts to the nearby Miracle Mile Historic District would occur due to its distance from the project site.

An assessment of the setting and design of the proposed project in relation to adjacent historical resources and the potential for the project to materially impair the identified historic resources is provided below.

Setting

The area surrounding the project site is a blend of commercial and residential uses. Wilshire Boulevard and La Brea Avenue, both wide streets, are characterized by commercial uses. The project site is located just east of the east end of Wilshire Boulevard's Miracle Mile, which is characterized by large buildings at primary intersections with distinctive tower elements. Historically, these larger buildings were interspersed with low-rise commercial structures; however, recent development of mid-rise residential buildings along Wilshire Boulevard has somewhat diminished this distinctive character at the eastern end of the Miracle Mile. These two commercial streets have broad sidewalks with few street trees and buildings are generally constructed to the lot lines with a solid building mass and pedestrian-oriented ground floors. In this type of urban, commercial environment, the setting is typified by the relationship of buildings to each other and to the street, pedestrian access and orientation, setbacks, and views.

In contrast to Wilshire Boulevard and La Brea Avenue, in particular, Sycamore Avenue displays a distinctive low-scale, residential character with relatively low traffic volume, tree-lined sidewalks separated from the street by a planting strip or parkway, and landscaped front yard setbacks. In this type of urban, residential environment, the setting is typified by the relationship of buildings to the street,

sidewalk area, setbacks, and views. 8th Street, as a minor arterial, has smaller scale development than either Wilshire Boulevard or La Brea Avenue; much of it is still commercial, but the low density buildings such as the low-lying Firestone Tire and Rubber Building, provide a transition typical of that often found between areas of high-density commercial development and low-scale residential.

As proposed, the massing and articulation of each of the facades respective of its location on the project site addresses its specific context. The proposed building incorporates many of the features characteristic of the commercial district in which it will be placed. It does not explicitly mimic the relationship between height and mass in adjacent historical resources, but it does make many references to them. The proposed building incorporates many features of the styling of two historical resources directly across the project site, the E. Clem Wilson Building on Wilshire Boulevard, and the Firestone Tire and Rubber building on 8th Street. Of particular importance are the northwest and southwest corners of the new building as these are both the locations of closest proximity to adjacent resources as well as the most visible and prominent parts of the building, as they are on major arterials. Therefore, the building features distinctive design elements at each of these corners that respond to their immediate settings. While design features alluding to these historical resources are given special prominence at the corners, they are also carried across the facades in a more subdued fashion so that the entire building exhibits a unity in its design.

The corner of Wilshire Boulevard and La Brea Avenue is the point at which the relationship between the E. Clem Wilson Building and the proposed building is most visible, and, therefore, it is here where the relationship between the new building and its historic context is most strongly emphasized. An established pattern of tall buildings with distinctive tower elements characterizes the immediate commercial surroundings, and so it is at this corner that the new building rises to its highest point. A planar vertical “fin” references the vertical decorative treatment typical of the Art Deco style employed on the E. Clem Wilson Building. This corner of the building also reflects the tripartite division of base, shaft and capital seen on the E. Clem Wilson Building, with a three story massing at the ground level, a tall five story shaft above, and a shallow block-like mass at roof level that both visually serves to terminate the shaft while functionally providing a mechanical enclosure. Each of these three massings steps back from the one articulated beneath it as a subtle reference to the setbacks also expressed vertically in the historic E. Clem Wilson Building.

At the same time that the verticality and distinctiveness of the building at the corner of Wilshire Boulevard and La Brea Avenue is an important aspect of its design, the scale and relationship of the adjoining facades to the commercial corridors they front is equally important. The proposed building is several stories shorter than the tallest of the nearby historical resources, including the E. Clem Wilson Building; however, it draws upon many of the features from these historical precedents in its scale and massing. These features include the interplay of solids and voids, linear and stepped design motifs, and

use of material variation in masonry and glass across the façades. Unlike typical nearby historical resources, where height and mass are concentrated in a tower with small footprint relative the overall ground level building footprint, the new building has a relatively continuous height and mass along its Wilshire Boulevard, La Brea Avenue and 8th Street elevations. However, a scale compatible with the historical precedents is achieved through articulation of the new building facades in a manner that draws inspiration from them.

On the north, west, and south facades, a scale oriented to the pedestrian is achieved through a solid building mass set against the lot lines at lower levels and a broad street-level expanse of glazed storefront. The solid building mass and the commodious storefronts allude to the historical precedents established by adjacent buildings such as the E. Clem Wilson Building. References to adjacent historical resources are also subtly articulated in the alternating rhythm of mass and void created above the ground floor retail. Here, every other pair of bays is recessed away from the plane of the street to provide balconies, which recalls the interplay of solid and void employed in the stepped massing of the E. Clem Wilson Building. Many of the structural bays are also expressed, particularly at the first three levels on the Wilshire Boulevard facade, an allusion to the expression of the structural grid on the exterior of the adjacent historical precedent.

At the corner of La Brea Avenue and 8th Street, a vertically oriented curved corner element announces the retail space that runs the length of La Brea Avenue. This curved element breaks the otherwise continuous elevation of linear retail storefronts; it is both taller and more solid in its massing. The curved element at this corner is a contemporary interpretation of the Streamline Moderne canopy style featured at the Firestone Tire and Rubber retail store across 8th Street from this corner of the project site. While the Firestone building has a distinctive curved band that wraps the corner as a quarter-round, the curved corner element for the proposed building features multiple discontinuous bands that create an interplay of solid and void as they interrupt curved windows, also arranged in a banded pattern. A curved metal screen, mounted partially over this interplay of solid band and glazed void, introduces yet another variation in texture and surface to this interpretation of the adjacent historical precedent, as it also functions to announce the entry underneath it. As an allusion or reference to the adjacent historical precedent, this compatible treatment of the corner echoes the corner opposite the site and serves to knit the new proposed building into the existing fabric of the neighborhood. The subtle allusions to historical precedents employed on these façades heighten the more overt references to be found at the two corners of the building directly across from historical resources, which allows them to more fully stand out as focal counterpoints.

The proposed building has two very different contexts that it must address – the mixed commercial and residential areas of Wilshire Boulevard, La Brea Avenue, and 8th Street to the north, west and south – and

the residential area of Sycamore Avenue to the east. Therefore, the proposed building addresses these contexts differently. On Wilshire Boulevard, La Brea Avenue, and the western portion of 8th Street, the façades achieve a character sympathetic to their more urban context with pedestrian-oriented retail storefronts aligned in a unified row along the street with residential units above. The seven-story height of the building is a low-slung form relative to many of the buildings around it, echoing the shift in scale between and mix of high-, mid- and low-rise buildings present throughout the length of Miracle Mile. However, the overall scale of these three façades is effectively reduced by visually expressing the separation of retail and residential uses as they occur at different levels. This is accomplished through variation in fenestration patterns and the articulation of the façade. While the north, west and south façades of the proposed building clearly address mixed-use commercial and residential areas, the east façade of the proposed building fronts the low-scale residential development of Sycamore Avenue. Therefore, to the east, the mass of the building steps down to three stories in height as it approaches buildings of a lower scale. On this facade, the four highest stories are set back from the street upon a three-story height base, and this serves to diminish the perceived height from street level. Furthermore, rather than the building being a unified linear mass on this facade, as it is on the other three façades, it is broken up into five tower-like massings separated by landscaped courtyards above the base podium level, so that the decreased density respects the residential character of the existing neighborhood. Only the narrow ends of the seven-story high massings are visible from the street, and the solidity of each tower alternates with the openness created by each courtyard. The massing of the building is further broken down at the street-level defined by the building's three-story height. Here, small-scale recessed entries directly off the sidewalk are defined by low, stepped platforms and overhanging entry canopies. These design features keep the scale and mass of the new building relatively similar in its relationship to the street to that of the nearby residences. Meanwhile, the taller residential units of the remaining four floors set back on the base are much less articulated architecturally so that they visually recede. The residential character of the street is further reinforced through reiteration of landscape features characteristic of the area such as tree-lined sidewalks set off from the street with planting strips or parkways and front-yard setbacks. These landscape features serve to further define the individual entries to the three-story flat/townhouse units and contribute to the overall pedestrian scale of the neighborhood.

To summarize, while the new building would be visible from all directions, its contemporary design would be clearly differentiated and its overall height and setbacks would be generally compatible with adjacent historic resources and existing development in the immediate surroundings of the project site. The curved corner element at the intersection of Wilshire Boulevard and La Brea Avenue would emphasize verticality and would be in keeping with the historic character of the adjacent Miracle Mile District, which was historically characterized by large buildings at primary intersections with distinctive tower elements. The pedestrian-oriented ground floor would be in keeping with other buildings on

Wilshire Boulevard and La Brea Avenue. The lower scale of the project building on Sycamore Avenue would be compatible with lower-scale residential uses on that street. For these reasons, the new building would not materially alter the setting of adjacent or nearby historical resources.

As part of the project, 8th Street is proposed to be widened between Sycamore Avenue and La Brea Avenue. The proposed widening would create a dedicated left turn lane from westbound 8th Street onto southbound La Brea Avenue. Where such widening is proposed, the street width on the south and north sides of 8th Street are proposed to increase by approximately 3 and 12 feet respectively. With the exception of the area north of Firestone Tire and Rubber, which is a paved sidewalk from building to curb, the street features a planting strip or parkway with trees and a sidewalk. As the proposed street widening along 8th Street would be minimal on the south side, it would not significantly alter the setting of the Firestone Tire and Rubber building or the adjacent potential Period Revival residential historic district.

Design Compatibility

Determining compatibility of the new building with adjacent historical resources involves assessing how the massing, materials, height, rhythm of bays, relationship of solids to voids, and other elements of the proposed new design relate to, and reinforce, the character of adjacent historical resources. Compatibility can also be enhanced by the new construction's relative distance from historical resources. Appropriate distance and compatible design of new construction help ensure that character-defining features of the historical resources would not be changed, obscured, damaged, or destroyed by the new building.

As proposed, the new building evinces several design elements that reinforce its compatibility with adjacent historical resources. The first of these is the relatively large space buffer between the project site and adjacent historical resources. Public streets and, in some cases setbacks, separate all historical resources from the new building, thereby reducing the effect of the additional height and mass of the project to surrounding historical resources.

One element of the concept layout that reinforces design compatibility of the proposed building with the E. Clem Wilson Building is the cornice height of the three-story high base at the corner of Wilshire Boulevard and La Brea Avenue that mimics the height of the base of the adjacent historic resource. At this corner, the articulation of the divisions of base, shaft and capital references the setbacks present on the E. Clem Building that also helps to create a visual connection between old and new. This visual connection is extended to three of the buildings facades in the ground floor retail along the facades fronting Wilshire Boulevard, La Brea Avenue and 8th Street. The scale, rhythm, and size of bays of the lower floors of the new building clearly draw inspiration from the commercial historic buildings in the

surrounding area. Inclusion of ground floor storefronts also animates the streetscape in a manner that is in keeping with the surrounding neighborhood and historic buildings. Moreover, the proposed building height on the north, west and east facades is reflective of the historic character and development trends of the commercial areas that they abut as discussed above, while the proposed height of the east façade is in keeping with the historic character of the residential area along Sycamore Avenue.

The building also takes a number of cues from adjacent historical resources at its southwest corner fronting La Brea Avenue and 8th Street. At this corner, the low-slung, curving, cantilevered overhang of the adjacent Firestone Tire and Rubber building is referenced in both the proposed building's massing and in the articulation of its façade. At ground level, a small recessed entry plaza is formed by an inset of the proposed building's massing, much like the recess created by the broad sweeping canopy of the adjacent historic resource. The corner of the proposed building is curvilinear so that it also references the historic resource, while interpreting its form in a more contemporary manner. A continuous bank of curved glazing on the ground retail floor recalls the curved solid wall of the adjacent resource. Above the inset entry plaza, an interplay of decorative curved banding elements intersecting with curved strips of glazing refer to the adjacent building without replicating historical features in either material or expression. Also above the inset plaza, a gently curved pierced metal panel follows the curvature of the building corner. This panel is one of the more overt references to the adjacent Firestone building as the metal panel is at nearly the same height as the curvilinear parapet it references. In addition to referring to specific design elements of the Firestone building in the proposed building, a more general reference to the Streamline Moderne style is also made. A vertical post, an oblong rectangle in shape and offset in its relation to the corner, provides support for the roof overhang. It visually anchors the entire composition of the façade at this corner while recalling the balanced asymmetry often evidenced in Streamline Moderne compositions.

As previously stated, the proposed building has two different contexts to which it must respond with sensitivity - the mixed commercial and residential context of La Brea Avenue, Wilshire Boulevard, and 8th Street to the north, west and south, and the residential context of Sycamore Avenue to the east. On the Sycamore Avenue elevation of the proposed south building, setbacks, height, and building type directly reference the historic residential buildings opposite the project site. While the Sycamore Avenue elevation is denser and somewhat taller than the surrounding residential area, it provides a transition between the higher density of the facades that front the commercial corridors and the lower scale of the residential neighborhood. On this east elevation, careful attention has been paid to replicating the scale of the existing residential pattern at street level to complement surrounding residential historical resources. In addition, on Sycamore Avenue, a 15 foot wide setback would allow for development of a 5,400-square-foot landscaped area along Sycamore Avenue and a 1,600-square foot garden at the corner of Sycamore

Avenue and 8th Street would provide additional transition between the height and mass of the project building and the lower-scale residential neighborhood east of the site on Sycamore Avenue.

The historic resources assessment concluded that the design compatibility of the new building would be in conformance with the Secretary's Standards. For this reason, while the existing setting would be materially altered by project implementation, the alteration of the immediate surroundings would not result in significant impacts on adjacent historical resources. Therefore, the proposed project would result in less than significant impacts on adjacent and nearby historical resources.

Summary of Impacts to Historic Resources

A summary of the resources on and in the vicinity of the site, a determination regarding their status as potential historic resources, and a summary of impacts resulting from implementation of the proposed project is provided in **Table IV.C-3**.

Table IV.C-3
Identified and Potential Historical Resources and Project Impacts

	Common name/ historic name	Address	Construction date	Surveyed/ Status Code	Evaluation	Impacts
Project site						
1	Wilshire Grace Church	5220 Wilshire	1965	N/A	Not eligible	No impact
2	Metroplaza Mall	752 La Brea	1945, 1984	N/A	Not eligible	No impact
Adjacent properties / historical resources						
3	E. Clem Wilson Building/ Mutual of Omaha	5217 Wilshire	1930	2S2	NRE, ^a CRL ^b	Less than significant impact
4	Security Pacific Bank/ Security-First National Bank	5207-5209 Wilshire	1929	1S	NRL, ^c CRL, HCM ^d	Less than significant impact
5	Jack in the Box	5201 Wilshire	1997	3D	Not eligible	No impact
6	N/A	5174 Wilshire	1984	N/A	Not eligible	No impact
7	Bank of America	711 La Brea	1942	N/A	Not eligible	No impact
8	Wilshire-La Brea Recreation Center	735 La Brea	1938	N/A	Not eligible	No impact
9	AmeriPros Auto Body	747 La Brea	1937/1942	N/A	Not eligible	No impact
10	N/A	757 La Brea	1925	N/A	Not eligible	No impact
11	Firestone Tire and Repair	800 La Brea	1937	N/A	CRE ^e	Less than significant impact

	Common name/ historic name	Address	Construction date	Surveyed/ Status Code	Evaluation	Impacts
Nearby properties / historical resources						
12	Potential Period Revival Residential Historic District	Bounded by Sycamore, Olympic, Highland, and Wilshire	1920–1930	N/A	CRE	Less than significant impact
13	Miracle Mile Historic District	5318–5514 & 5353–5519 Wilshire	1920s	2S2	NRE, CRL	Less than significant impact due to distance from project site

Source: Chattel Architecture, Planning and Preservation, Inc., August 28, 2007.

^a "NRE" – National Register eligible

^b "CRL" – California Register listed

^c "NRL" – National Register listed

^d "HCM" – City of Los Angeles Historic-Cultural Monument

^e "CRE" – California Register eligible

Archaeological Resources

A project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA if the project:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100 years old⁵ and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

⁵ Although the CEQA criteria state that "important archaeological resources" are those, which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.

The Initial Study prepared for the proposed project determined that potential impacts to archaeological resources and human remains would be less than significant with the inclusion of **MM-CR-1**, **MM-CR-2**. As discussed in the Initial Study prepared for the proposed project, no known archaeological sites exist on or adjacent to the project site, and based on the historic uses of the project site, intact human remains are unlikely to be present beneath the site. Excavation for the foundations and subterranean parking levels associated with the proposed project would cause new subsurface disturbance on the project site. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed unique archeological resources exist on this site. Based on the past uses of the site, it is unlikely that intact human remains are present beneath the site. However, unanticipated discovery of unique archeological resources or intact human remains is possible. In the event of an unexpected disturbance, significant impacts to archaeological resources and human remains could occur. However, implementation of **MM-CR-1** and **MM-CR-2** would reduce potentially significant impacts to less than significant levels.

Paleontological Resources

The determination of significance is made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

The Initial Study prepared for the proposed project determined that potential impacts to paleontological resources would be less than significant with the inclusion of **MM-CR-3**. As discussed in the Initial Study prepared for the proposed project, no unique paleontological resources or unique geologic features are known to occur on the project site; although, paleontological resources do exist throughout the City of Los Angeles. Excavation for the foundations and subterranean parking levels associated with the proposed project would cause new subsurface disturbance on the project site. As the project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed paleontological resources or unique geologic features exist in the upper levels of subsurface soil. Soils underneath the project site consist of silty clay with various amounts of silt.⁶ This soil type is not typically known to yield paleontological resources. However, unanticipated discovery of unique paleontological resources is possible. In the event of an unexpected disturbance, significant impacts to

⁶ RTF&A Geotechnical Engineering and Engineering Geology, *Draft Report of Preliminary Geotechnical Investigation, Proposed Wilshire La Brea Mixed-Use Project, 5220 Wilshire Boulevard, Los Angeles, California for Wishlab 90, LLC*, May 5, 2006, p. 4.

paleontological resources remains could occur. However, implementation of **MM-CR-3** would reduce these impacts to a less than significant level.

c. Cumulative Impacts

CEQA requires that the cumulative impacts of a project be examined. The related projects identified in **Section III, General Description of Environmental Setting**, are located at enough of a distance from the project site to not create any potentially significant cumulative impacts to cultural resources. Implementation of the proposed project would result in less than significant impacts on cultural resources. Therefore, the contribution of the proposed project on impacts to cultural resources in the area would not be cumulatively considerable.

d. Mitigation Measures

The following three mitigation measures were identified in the Initial Study prepared for the proposed Wilshire and La Brea Project to reduce unanticipated impacts to unique paleontological and archaeological resources, as well as any discovered human remains.

MM-CR-1. If archaeological resources are uncovered on the project site during excavation, the developer must notify the Los Angeles Department of Building and Safety immediately and work must stop within a 100-foot radius until a qualified archeologist has evaluated the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 2103.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.

MM-CR-2. If during excavation of the project site human remains are discovered, the steps described in the *State CEQA Guidelines* Section 15064.5(e) shall be followed.

- (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - (A) The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and
 - (B) If the coroner determines the remains to be Native American:
 1. The coroner shall contact the Native American Heritage Commission within 24 hours.

2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
 3. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
- (2) Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
- (A) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
 - (B) The descendant identified fails to make a recommendation; or
 - (C) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

MM-CR-3. If paleontological resources are uncovered during excavation of the project site, the City of Los Angeles Department of Building and Safety must be notified immediately and work must stop within 100 feet of the find to allow a qualified paleontologist to appropriately remove the find.

e. Adverse Effects

Historical Resources

Project and cumulative impacts related to historical resources would be less than significant; therefore, no mitigation measures are required or recommended.

Archaeological Resources

With implementation of the recommended mitigation measures, **MM-CR-1** and **MM-CR-2**, project and cumulative impacts related to archaeological resources and human remains would be less than significant.

Paleontological Resources

With implementation of the recommended mitigation measure, **MM-CR-3**, project and cumulative impacts related to paleontological resources would be less than significant.