For purposes of this Draft EIR, the area of cultural resources encompasses historical resources, archaeological resources, and paleontological resources as set forth in CEQA Guidelines, Appendix G. These topics are discussed under separate subheadings within this section of the Draft EIR. Tribal Cultural Resources is discussed in Section 4.15 of this Draft EIR.

INTRODUCTION

This subsection provides an overview of the historical resources in the Project Sites’ vicinity and, in accordance with CEQA, evaluates direct and indirect impacts associated with development of the proposed Project. This section includes the following: (1) identification and evaluation of the significance of any historical resources falling within the Project Sites and areas of potential impacts; (2) analysis of the Project’s potential impacts on historical resources; and (3) identification of mitigation measures for any significant impacts (pursuant to CEQA Guidelines Section 15126.2) on cultural resources.

The following analysis is based on the following preliminary historical evaluation for the Project:

- Vermont Corridor Development Plan Historical Resource Report, prepared by GPA Consulting, May 2017 (Draft EIR Appendix 4.3-1).

The report presents the historical assessment of the Project and discusses the potential for historical resources in the study area and any impacts that the Project may have on the identified historical resources. For the purposes of the report, the study area was identified as the three Project Sites and abutting parcels. The report is based on review of the proposed Project, historical records search results, and ordinances, statutes, regulations, bulletins, and technical materials, as well as field surveys of the Project Sites, and research of the Project Sites’ vicinity. Furthermore, the analysis in this subsection includes a description of the regulatory framework, thresholds for determining if the Project would result in significant impacts, mitigation measures (if determined applicable), and the level of significance after mitigation.

ENVIRONMENTAL SETTING

Historical Development of the Project Vicinity

The Project Sites and surrounding vicinity are located in the Wilshire Community Plan Area of the City of Los Angeles. Historically, this neighborhood was known as the Wilshire Boulevard district or Wilshire Center. The area developed to the north and south of Wilshire Boulevard, a major east-west thoroughfare, connects downtown Los Angeles to the ocean. Wilshire Boulevard is located one block south of West 6th Street. Following the initial subdivision of the area in the 1880s, Wilshire Center was developed with a variety of residential, commercial, and institutional property types.

In 1886, brothers Henry Gaylord and William Wilshire subdivided their 35 acres of barley fields speculating for the development of wealthy single-family homes as spillover from the recently developed Westlake Park (today known as MacArthur Park) to the east. The subdivision successfully attracted the social elite from downtown and the area became a well-known enclave of extravagant single-family homes in the late 1800s. The city expanded its borders west to include Vermont Avenue in 1897.
Streetcar lines that ran on 6th Street, 8th Street, 9th Street and Western Avenue connected the area to downtown, and facilitated development. In the 1910s, development trends in the area shifted from single-family homes to luxurious apartment hotels, replacing some of the original single-family homes with denser development. Religious institutions followed their congregants and built large, lavish houses of worship in the area. In 1928, building restrictions that prohibited commercial development on Wilshire Boulevard were removed and the commercial real estate market in the area boomed. With the rapid development of commercial buildings and the influx of departments stores, Wilshire Center adopted the moniker “Fifth Avenue of the West,” retaining its elite status, but transitioning to a commercial destination.\(^1\) The new commercial landscape began attracting tourists who wanted to see where the stars shopped and admire their homes.

As automobile ownership became common in the 1930s, downtown was decentralized and the streetcar routes became less important. The eastern and western sections of Wilshire Boulevard were fully connected across Westlake Park in 1934. Western Avenue and Vermont Avenue, major intersecting streets with Wilshire Boulevard, were transformed from residential thoroughfares to major commercial arteries. Specifically, Vermont Avenue contained a concentration of automobile showrooms, both new and used, constructed in the most popular architectural styles of the time.\(^2\)

In the late 1950s office development spread from Wilshire Boulevard north along Vermont Avenue, beginning a transition from a concentration of auto showrooms to a concentration of corporate office buildings.\(^3\) From the 1940s to 1960s, many of the auto showrooms were replaced by office buildings and multi-family housing brought on by post-World War II population growth and the increasing decentralization of the city. Typical developments of the period were high-rise office buildings designed in styles of the Modern Movement and “dingbat” multi-family apartment buildings. The area retained its elite status up until the 1970s, when shopping malls built throughout the region brought on the decline of commercial corridors like Vermont Avenue and Wilshire Boulevard. Although office buildings were still erected in the area throughout the 1970s, the department stores along Wilshire Boulevard closed and wealthier residents moved out of the area, making way for a socioeconomic and demographic shift.

One of the shifts in Wilshire Center in the mid-twentieth century was an influx of residents from Korea. The first wave of Korean immigrants arrived in Los Angeles with the onset of the Japanese occupation of Korea, which lasted from 1910 to 1946. During this period, the Korean population settled and remained in an area south of the Project Sites. As businesses closed and properties were vacated in Wilshire Center in the 1970s, rents became more affordable, which created an opportunity for the growing Korean community. The heart of the Korean American business community was centered along Wilshire Boulevard between Normandie Avenue to the east and Western Avenue to the west. The area officially adopted the name “Koreatown” in 1971 although it included a large Latin American immigrant population. The 1970s saw a wave of mini-mall construction in the area as Korean businesses were established. By


\(^3\) Ibid.
1985, 40 percent of all Korean-owned businesses in the City of Los Angeles were located in the Koreatown area.4

Major changes to the area occurred following the opening of the Metro system, with multiple stops along Wilshire Boulevard, and an increasing population of younger people. Multiple new high-rise, mixed-use buildings have been constructed in the area since the late 1990s.

The style of the buildings located on the Project Sites is best described as Mid-Century Modern. Most examples of Mid-Century Modern commercial architecture in Los Angeles were constructed following World War II and are concentrated in communities developed in the postwar era, such as those in the San Fernando Valley.

The prevalent architectural style for commercial buildings constructed between 1946 and 1965 across the United States was Mid-Century Modern. Frequently, buildings from the pre-1946 period were altered to fit modern aesthetics and sensibilities in the postwar era. Mid-Century Modern was fully embraced by the public following World War II. The style utilized the industrial materials and streamlined construction techniques developed during the war years. Designs relied on light metal or concrete frames sheathed in thin glass skins over boxy, geometric forms.5 The unadorned simplicity and technological sophistication of the style demonstrated a “faith in the future and progress.”6

Nationwide, noted architects designed every type of commercial, residential, and institutional building in the Mid-Century Modern style. With its immense postwar growth and community of émigré exiled European architects, Los Angeles became a center of Mid-Century Modern design. Master architects of the Mid-Century Modern style, such as Richard Neutra, A.C. Martin, Wurdeman & Becket, Edward Durrell Stone, and Charles Luckman designed buildings in the style throughout Los Angeles. Until the late 1950s, newly constructed commercial buildings were relatively small in scale due to existing height restrictions of 150 feet and the emphasis on developing suburban, automobile-centric communities in outlying areas of the city.

In the early 1960s, a new wave of Mid-Century Modern commercial architecture began along the region’s commercial and office corridors, with a concentration of Modern skyscrapers in the redeveloping area of Bunker Hill in downtown Los Angeles. While office-building development had consistently radiated west from downtown along Wilshire Boulevard, in the late 1950s the intersection of Vermont Avenue and Wilshire Boulevard transformed into a corridor of commercial office development from an intersection of relatively low rise automobile dealerships and retail buildings. Most new buildings were constructed in the prevailing Mid-Century Modern commercial styles of the times. These new buildings were boxy in massing and featured walls of glass and stucco as well as accommodations for automobile parking.

Previously Recorded Historical Resources

GPA Consulting requested a search of California State University, Fullerton South Central Coastal Information Center ("SCCIC") records to identify known and previously recorded historical resources. The

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6 Ibid., 412.
SCCIC collects records on properties listed or determined eligible for listing in the National Register of Historic Places ("National Register"), California Register of Historical Resources ("California Register"), California Historical Landmarks, Points of Historical Interest, as well as properties that have been previously identified or evaluated in historic resource surveys. Additionally, the Los Angeles Historic Resources Survey, SurveyLA was consulted to determine whether or not the Project Sites and vicinity contain any properties that were identified as significant. No previously recorded historical resources have been recorded by SCCIC in the study area; however, SurveyLA determined that a rooftop sign on the Brynmoor Apartments Building, located at 432-436 South New Hampshire Avenue, immediately west of Site 3, is designated as Los Angeles Historic-Cultural Monument #641. The sign is an example of an intact neon rooftop sign. Though the date of its installation has not been determined, Los Angeles has a long history of neon rooftop signs. Los Angeles became one of the first cities to embrace neon lighting technology after signs were installed at a Packard automobile dealership in 1923. Neon tended to be concentrated along automobile corridors such as Wilshire Boulevard, where multi-family residential and commercial buildings alike used the signs for advertising purposes. The Brynmoor Apartments Neon Roof Sign was designated in 1997.

Regulatory Framework

A lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register. The California Register is modeled after the National Register. Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant. The National Register, California Register, and local designation programs are discussed below. Site 1 (County office building) and Site 3 (affordable housing and community recreation center public benefit project) are exempt from City land use regulations. Therefore, the applicable local designation program for Sites 1 and 3 is the County of Los Angeles Historic Preservation Ordinance. Site 2 is subject to City zoning regulations and therefore the applicable local historic designation program for that property is set forth in the City of Los Angeles Cultural Heritage Ordinance.

Federal

National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."
Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of four established criteria. A property must be: 12

A. Associated with events that have made a significant contribution to the broad patterns of our history; or

B. Associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Yield, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.” 13 A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance.” 14 Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

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12 Title 36 Code of Federal Regulations Part 60.4.
14 Ibid., pages 44-45.
State

California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.\footnote{Public Resources Code Section 5024.1 \((a)\).}

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the California Office of Historic Preservation (“OHP”) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.\footnote{Public Resources Code Section 5024.1 \((d)\).}

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; 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, 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 in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the
California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.17

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:18

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [OHP] procedures and requirements;
3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
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 that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

**OHP Survey Methodology**

The evaluation instructions and classification system proscribed by the OHP in its *Instructions for Recording Historical Resources* provide a three-digit evaluation code for use in classifying potential historical resources. In 2003, the codes were revised to address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

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17 Public Resources Code Section 4852.
18 Public Resources Code Section 5024.1.
CEQA requires a lead agency to analyze whether historical resources may be adversely impacted by a proposed project. Under CEQA, a “project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment” (Public Resources Code “PRC” Section 21084.1). Answering this question is a 2-part process. First, the determination must be made as to whether the proposed project involves historical resources. Second, if historical resources are present, the proposed project must be analyzed for a potential “substantial adverse change in the significance” of the resource.

According to CEQA Guidelines Section 15064.5, for the purposes of CEQA, historic resources are:

1. A resource listed in, or formally determined eligible for listing in, the California Register of Historical Resources (PRC 5024.1, Title 14 CCR, Section 4850 et seq.);
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significance in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC;
3. Any building, structure, object, site, or district that the lead agency determines eligible for national, State, or local landmark listing; generally, a resource shall be considered by the lead agency to be historically significant (and therefore a historical resource under CEQA) if the resource meets the criteria for listing on the California Register (as defined in PRC Section 5024.1, Title 14 CCR, Section 4852). Resources nominated to the California Register must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity (as defined in previous section) does not meet NRHP criteria may still be eligible for listing in the California Register.

According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the California Register or is not included in a local register or survey shall not preclude the lead agency from determining that the resource may be an historical resource (PRC Section 5024.1). Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (CEQA Guidelines, Section 15064.5(b)).

The CEQA Guidelines specify that “substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines, Section 15064.5). Material impairment occurs when a project alters in an adverse manner or demolishes “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” or eligibility for inclusion in the National Register, California Register, or local register. In addition, pursuant to CEQA Guidelines Section 15126.2, the “direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”

Of particular relevance to this study’s analysis of indirect impacts to historical resources are the following guides and requirements. Pursuant to CEQA Guidelines, Section 15378, study of a project under CEQA requires consideration of “the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.”

CEQA Guidelines, Section 15064d further define direct and indirect impacts:
1. A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.

2. An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.

3. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.

**Local**

**Los Angeles County Historic Preservation Ordinance (Sites 1 and 3)**

Site 1 is owned by the County and would be developed for County use and would be subject to County building regulations. Site 3 is located on land owned by the County and would be developed with a public benefit (affordable housing) project. Site 3 development would be subject to County building code requirements.

Accordingly, the Los Angeles County Historic Preservation Ordinance (Part 28 of Chapter 22.52 of the Los Angeles County Code, or the “Historic Preservation Ordinance”) provides the appropriate historic criteria for Sites 1 and 3.

The Historic Preservation Ordinance seeks to preserve distinctive historical, architectural, and landscape characteristics that are part of the County’s overall history, and includes criteria and procedures for the designation of landmarks within unincorporated Los Angeles County, as well as County-owned properties.¹⁹

A structure, site, object, tree, landscape, or natural land feature may be designated as a Los Angeles County Landmark if it is 50 years of age or older and satisfies one or more of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community in which it is located;

2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community in which it is located;

3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community in which it is located; or possesses artistic values of significance to the nation, State, County, or community in which it is located;

4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, State, County, or community in which it is located;

5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined

¹⁹ *Los Angeles County Historic Preservation Ordinance (Ord. 2015-0033 § 3, 2015).*
eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;

6. If it is a tree, it is one of the largest or oldest trees of the species located in the County; or

7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with an historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

A property less than 50 years of age may be designated as a County Landmark if it meets one or more of the above criteria and exhibits exceptional importance. The interior space of a property or other space held open to the general public, including but not limited to a lobby, may be designated as a Landmark or included in the Landmark designation of a property if the space qualifies for designation as a Landmark under the applicable criteria.\(^\text{20}\)

**Los Angeles City Cultural Heritage Ordinance (Site 2)**

Site 2 is located in the City, on land owned by the County. Development on Site 2 would include mixed residential and commercial uses under a ground lease, and would be subject to City zoning and building regulations. Thus, the City of Los Angeles Cultural Heritage Ordinance (“Cultural Heritage Ordinance”) provides the appropriate historic criteria for Site 2.

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (“HCM”). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The four criteria for HCM designation are stated below:

- The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community; or
- The proposed HCM is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.\(^\text{21}\)

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

\(^{20}\) *Los Angeles County Ord. 2015-0033 § 3, 2015, Section 22.52.3060.*

\(^{21}\) *Los Angeles Administrative Code Section 22.171.7.*
Historical Resources Assessment and Evaluation of the Project Sites

The buildings and structures on the Project Sites over 45 years of age were evaluated in this report using the National Register of Historic Places, California Register of Historical Resources, and County Historic Preservation Ordinance criteria for Sites 1 and 3, and City Cultural Heritage Ordinance for Site 2. Applicable sections of the Los Angeles Historic Context Statement, prepared as part of Survey LA and applicable to all properties within the City of Los Angeles, were utilized as a framework for evaluating the properties.

**Site 1**

Site 1 is developed with two office buildings (510 South Vermont Avenue and 532 South Vermont Avenue), a surface parking lot, and a parking structure (523-531 Shatto Place).

**510 South Vermont Avenue**

510 South Vermont is a two-story, rectangular office building oriented towards Vermont Avenue, abutting the sidewalk. The building was designed by the architecture firm Wormhoudt & Tennebaum\(^{22}\) and constructed in 1959 as an office building by owner M. William Downs. The first tenant listed for the building was the US Government Justice Department of Immigration and Naturalization Services in 1960.\(^{23}\) Frequent turnover of tenants was common and many new owners made changes to the interior of the building, however, no major exterior alterations were recorded in building permits.\(^{24}\) The building is now offices for the Los Angeles County Parks & Recreation Department.

The building appears to be one of many office buildings constructed along Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building’s specific association with this trend could be considered important. No information could be found about original owner M. William Downs. The building had a variety of tenants. Though one of these tenants, IBM, is significant in American commercial history, research does not indicate that the building was the site of significant events in the company’s history during the two years the firm was a tenant. Long-term owners J.A. Enterprises, a commercial real estate development firm, do not appear to be significant in the history of the Wilshire Center’s development. No information was found to suggest that individuals of historic significance were associated with the building.\(^{25}\)

The building is best described as Mid-Century Modern in style. While it exhibits several character-defining features of the architectural style as applied to the property type, as a whole, the building is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The architects of the building are listed as Wormhoudt & Tennebaum. Neither the partnership nor individual work of Charles Wormhoudt and David


\(^{23}\) Ibid.

\(^{24}\) Ibid., pages 14-15.

\(^{25}\) Ibid., page 15.
Tennebaum has been identified as masterful. Their work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that either could be considered a master architect. Accordingly, the Historical Resource Report determined that the 510 South Vermont Avenue building does not appear to be eligible for listing as a historical resource under national, state or local criteria.  

532 South Vermont Avenue

532 South Vermont Avenue is a one-story, rectangular office building clad in stucco. The building was designed by John M. Cooper and constructed as a United States Post Office substation in 1938 when the parcel was owned by the Trustees of John G. Bulbeck’s Estate. Several alterations were made to the interior and exterior after the postal service vacated, including the 1959 replacement of the composition roof with rooftop parking under the direction of engineer R.Y. Lin and contractor Ellis White. In 1960, architect Charles Wormhoudt completed an addition of exterior stairs on the north side elevation and the addition of a marquee to the west elevation. Multiple later alterations consisted of reconfigurations of the interior partitions. New York Life Insurance Company is listed as a tenant from 1964 until they relocated their offices in 1974. The property was sold to J.A. Enterprises around 1966 and then to Acoustics Inc. in the late 1970s.

No information was found to indicate the building played an important role in the history of the United States Postal Service. After alterations in 1959, the building appears to be similar to many small office and commercial buildings constructed along Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building’s specific association with this trend could be considered significant. Later owners MW Downs, an individual developer, and J.A. Enterprises, a commercial real estate development firm, do not appear to be significant in the history of development. No information was found to suggest that individuals of historic significance were associated with the property.

The building has been substantially altered since its original construction in 1938. It is now best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building has been altered since initial construction and does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The original architect of the building was John Montgomery Cooper (1883-1950), a prolific local Los Angeles architect. Cooper designed a variety of building types, but strongly influenced the design of industrial buildings in Los Angeles.

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26 Ibid., page 15.
27 Ibid., page 17.
28 Ibid.
29 Ibid., page 18.
30 Ibid.
31 Ibid.
32 Ibid.
Angeles during the 1920s when he was the architect for a concentration of manufacturing and industrial loft buildings in the wholesale manufacturing and garment district in the area southeast of downtown Los Angeles. Cooper's designs ranged in style but like many architects during the Depression, Cooper completed designs for federal public works projects. The post office building at 532 S. Vermont Avenue was one of these buildings. Cooper never cited it as an example of his work. His designs for industrial buildings have been identified as significant and eligible examples of their property type; however, the building at 532 S. Vermont Avenue does not retain any resemblance to Cooper's designs or a building from the late 1930s and is not representative of his work as an architect. Accordingly, the Historical Resource Report determined that the 532 South Vermont Avenue building does not appear to be eligible for listing as a historical resource under national, state or local criteria.33

523-531 Shatto Place Parking Structure

523-531 Shatto Place is a six-story, rectangular, steel reinforced concrete parking garage facing Shatto Place and is clad in metal horizontal slats and solid stucco. The parking garage was designed by architect L.W. Davidson34 and constructed under the ownership of J.A. Enterprises in 1965. An elevator was added to the building in 1966.35

No information was found to indicate the structure played an important role in the development of Wilshire Center or Vermont Avenue as a center of commercial office development. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the structure's specific association with this trend could be considered significant. No information was found to suggest that individuals of historic significance were associated with the property.36

The parking structure does not appear to be an original or unique architectural statement nor an excellent example of an architectural style. L.W. Davidson was born in Chicago in 1913 and received his Bachelor of Science in Architecture from Illinois Institute of Technology in 1935. He worked primarily as an engineer and did not pursue an architectural career until the early 1950s. In 1953, he started his own firm, L.W. Davidson & Associates, based in North Hollywood. The firm completed projects all over the country, from Alaska to New York, focusing on large industrial buildings, public works projects, and military facilities and was active through the 1980s. His work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that Davidson could be considered a master architect. As such, the Historical Resource Report determined that 523-531 Shatto Place parking structure does not appear to be eligible for listing as a historical resource under national, state or local criteria.37

33 Ibid., pages 18-19.
34 Ibid., page 19.
35 Ibid.
37 Ibid.
Site 2

Site 2 is developed with two office buildings (540-550 South Vermont Avenue and 3175 West 6th Street) separated by a surface parking lot.

540-550 South Vermont Avenue

The 540-550 South Vermont Avenue building is a twelve-story, rectangular Mid-Century Modern high-rise office building. The building was designed by architect Charles Wormhoudt and completed in 1964 and was originally named the LeSage Building after the original owner, Robert Le Sage. Major alterations include the addition of a restaurant and a drug store on the first floor in 1965 using the same architect. A penthouse dwelling unit was added to the twelfth floor in 1965. Robert Le Sage resided in the penthouse suite in 1967. Subsequent alterations included the addition and removal of partitions on the interior as tenants changed. The building served as offices for various types of corporations and governments agencies. One of the first tenants was the State Division of Highways, which signed a ten-year lease in 1965 to occupy the first six floors of office space. Other tenants were typically insurance agencies. Other tenants include J.A. Enterprises, Bristol Myers Products, Republic Insurance Company, and Pacific National Life. The Imperial Drug Company was a tenant from 1967 to 1989. The Galleon Restaurant remained in operation at this building from 1967 until at least 1990, when it came under the ownership of Morris Magid. Building permits indicate that Los Angeles County purchased the property around 1991. The building is currently occupied by DMH.

The LeSage Building is one of many office buildings constructed along Wilshire Boulevard and Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building’s specific association with this trend could be considered important as well. The building had a variety of tenants. Research does not indicate that the tenants of the LeSage Building were significant in the development of Wilshire Center or may be considered significant companies in commercial history. No information was found to suggest that individuals of historic significance were associated with the property.

The LeSage Building is best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building has been altered since initial construction and does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century

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38 Ibid., page 23.
39 Ibid.
40 Ibid.
41 Ibid.
42 Ibid.
43 Ibid.
44 Ibid.
45 Ibid.
Modern style. The individual work of the architect, Charles Wormhoudt has not been identified as masterful. His work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that he could be considered a master architect. Accordingly, the Historical Resource Report determined that the LeSage Building at 540-550 S. Vermont Avenue does not appear to be eligible for listing as a historical resource under national, state or local criteria.46

**3175 West 6th Street**

The 3175 West 6th Street building is a four-story, rectangular office building clad in stucco. The building was designed by Norbert W. Pieper47 and constructed in 1958 under the ownership of Robert Le Sage. A one-story parking garage was added in 1959. Tenants since the building’s completion included various corporations, the majority of which were insurance companies. The building also served as offices for Robert Le Sage and J.A. Enterprises until both companies moved next door to 550 South Vermont Avenue in 1964. The type of tenants remained consistent after 1964, as various firms and insurance agencies moved in and out of the building. In 1969, tenants included several insurance agencies: Great Southern Insurance, Llewellyn Co. Insurance, Washington National Insurance, and Lincoln National Insurance Co.48 By 1973, the list of tenants consolidated to just three: Graham Miller & Co, Janpower, and Michael Gary Inc.49 The building is currently occupied by Los Angeles County Community Senior Services.

3175 West 6th Street is one of many office buildings constructed along Wilshire Boulevard and Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building’s specific association with this trend could be considered important as well. The building had a variety of tenants, mostly insurance agents. Later owners J.A. Enterprises, a commercial real estate development firm, do not appear to be significant in the history of development. Research does not indicate that the tenants of the building were significant in the development of Wilshire Center or may be considered significant companies in commercial history. No information was found to suggest that individuals of historic significance were associated with the property. Research does not indicate that the original owner, Robert Le Sage, could be considered an individual of historic significance.50

The office building is best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building has been altered since initial construction and does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The building was part of a larger development that was never completed. Subsequent changes to the site plan of the building in relation to adjacent buildings and structures have made it a “standalone” building. The architect of the building was Norbert Pieper. Pieper received his B.A. in Architecture from the University of California in 1951 and worked at the architecture and engineering firm

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47 Ibid., page 25.
48 Ibid.
49 Ibid.
50 Ibid.
of Sheldon L. Pollack until establishing his own architectural subsidiary within the company. Through the 1970s and 1980s, Pieper designed mid-rise office buildings around Southern California. The firm’s principals focused on frugality over design, which is apparent in its designs for 3175 West 6th Street. The architectural work of Pieper has not been identified as masterful. His work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that he could be considered a master architect. As such, the Historical Resource Report determined that the buildings at 3175 W. 6th Street do not appear to be eligible for listing as a historical resource under national, state or local criteria.51

Site 3

Site 3 is developed with an office building (427-433 South Vermont Avenue) and a surface parking lot.

427-433 South Vermont Avenue

The 427-433 South Vermont Avenue building is a four-story, slightly “T”-shaped building clad in stone veneer paneling and buff-colored brick. The building was designed by architect Henry Rossine52 and built in 1963 by a partnership known as 433 South Vermont Building Company. One of the first tenants listed is the Los Angeles County Probation Department in 1967.53 The County of Los Angeles held a seven-year lease that expired in April of 1972, after which the County bought the building from the partnership.54 The building is currently occupied by the Los Angeles County Department of Parks & Recreation. Alterations since 1963 include multiple reconfigurations of interior spaces for changing tenants.

The 427-433 South Vermont Avenue building is one of many office buildings constructed along Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building’s specific association with this trend could be considered important. The building was an early location of Los Angeles County government offices in the area; however, research does not indicate that the building was the site of significant events in the history of Los Angeles County’s government. No information was found to suggest that individuals of historic significance were associated with the property.55

The building is best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The architect of the building, Henry Rossine, was a local architect who designed a few commercial and residential buildings, repeating design elements across buildings. The work of Rossine has not been identified as masterful. His designs were typical of the period, representing variations of the Mid-Century Modern style. No information was

51 Ibid., page 26.
52 Ibid.
54 Ibid.
55 Ibid.
found to indicate that he could be considered a master architect. As such, the Historical Resource Report determined that the building at 427-433 South Vermont Avenue does not appear to be eligible for listing as a historical resource under national, state or local criteria.  

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts relative to historical resources, a Historical Resources Report was prepared by GPA Consulting to identify potential historical resources within the study area. As part of the preparation of the report, SCCIC and SurveyLA records were reviewed and a field inspection was conducted to determine what areas might be impacted by the Project and to identify any properties currently listed as landmarks under national, state, or local programs and whether or not any properties have been previously identified or evaluated as historical resources. Buildings on the Project Sites over 45 years of age were evaluated as potential historical resources according to National Park Service, State Office of Historic Preservation, and County of Los Angeles Historic Preservation Ordinance standards. Although the Project Sites are owned by the County of Los Angeles, they are located in the City of Los Angeles and were therefore evaluated in the context of the city’s development according to the Context/Theme/Property Type (CTP) eligibility standards formulated for the Los Angeles Citywide Historic Context Statement (LAHCS). The LAHCS is organized into contexts and themes. The Architecture and Engineering Context and the Mid-Century Modern Theme are the most relevant. Because of the ubiquity of the style in Los Angeles, designated and eligible examples of Mid-Century Modern office buildings generally meet a high threshold for quality of design. Significant examples of Mid-Century Modern office buildings meet the following eligibility standards:

- Constructed during the period of significance (1945-1970)
- Exhibit quality of design through distinctive features
- Retain the essential character-defining features of Mid-Century Modernism from the period of significance:
  - Direct expression of the structural system, often wood or steel post and beam
  - Flat roof, at times with wide overhanging eaves
  - Floor-to-ceiling windows, often flush-mounted metal framed
  - Horizontal massing
  - Simple, geometric volumes

The Historical Resources Report is attached to this Draft EIR as Appendix 4.3-1.

Thresholds of Significance

The potential for the proposed Project to result in impacts to historical resources is based on the CEQA significance threshold set forth in Appendix G of the State CEQA Guidelines.

Threshold 4.3.1-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

An affirmative answer to this question would constitute a significant impact.

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56 Ibid., pages 28-29.
Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreational center, and on-site parking. No specific design elements related to historical resources are included in the Project.

Impact Analysis

Threshold 4.3.1-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

The Project would involve demolition of all but one of the existing buildings and structures on the Project Sites. The 540-550 South Vermont Avenue building, located on Site 2 would be adaptively reused as a mixed-use building with ground floor commercial space and upper floor residential uses. As discussed in the Environmental Setting section above, the results of the South Central Coastal Information Center’s historical records search for the Project indicate that there are no known historical resources on the Project Sites and the Historical Resource Report determined that none of the existing buildings on the Project Sites are eligible for listing as historical resources. Accordingly, the Project would have no direct impacts on historical resources.

CEQA also requires the analysis of indirect impacts on historical resources in the vicinity of the Project. There is one historical resource in the study area for Site 3, the Brynmoor Apartments Neon Roof Sign, which is designated HCM #641. In determining impacts of adjacent new construction on an individual resource such as the Brynmoor Apartments Neon Roof Sign, the central question is whether the new building would affect the physical integrity of the historical resource to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the Brynmoor Apartments Neon Roof Sign no longer retained sufficient integrity to convey its significance. According to National Register Bulletin #15, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. Because the Project would not directly affect the neon sign, the only relevant aspect with respect to the impact of a new building on this historical resource is setting.

Site 3 abuts the rear of the parcel containing the five-story Brynmoor Apartments Building, on top of which the historical resource is located. The new six-story building on Site 3 would obscure the view of the roof sign from Vermont Avenue. At the time of its construction, the Brynmoor Apartments Neon Roof Sign was oriented towards Wilshire Boulevard and visible from this major automobile thoroughfare.

Although the roof sign is primarily oriented toward Wilshire Boulevard, it is also visible from Vermont Avenue. This secondary view of the sign would be obscured. However, the Vermont Avenue corridor is not identified by the City or the County as an important view location, and it is not a defined scenic resource as discussed in Section 4.1 Aesthetics. The new building would introduce a new visual element to the setting of the Brynmoor Apartments Neon Roof Sign; however, the setting in Wilshire Center is already characterized by a variety of mid and high-rise buildings that obscure views of the roof sign from the primary view from Wilshire Boulevard and secondary view from Vermont Avenue. As such, the Project would not result in a substantial adverse change to the Brynmoor Apartments Neon Roof Sign or its

57 Ibid., Executive Summary.
58 Ibid., page 32.
immediate surroundings to the degree its eligibility as a resource would be materially impaired. It would continue to possess all aspects of integrity, including setting, and would continue to be eligible for listing as historical resource defined by CEQA.\textsuperscript{59} No additional historical resources were identified in the vicinity of the Project Sites. Therefore, the Project would have a less than significant indirect impact on historical resources.

**CUMULATIVE IMPACTS**

The study area for cumulative impacts to historical resources is the extent of the related project sites (as listed in Section 3.0, Project Description and Environmental Setting). In terms of historic resources, the analysis of cumulative impacts relates to whether impacts of the proposed Project and future related projects, considered together, might substantially impact/diminish the number of similar historic resources, in terms of context or property type. Because the Project, as proposed, would not result in significant direct impacts to historic resources, the proposed Project would not contribute to a cumulative adverse direct impact to historic resources.

Although impacts to historic resources tend to be site-specific, a cumulative impact analysis of historic resources determines whether the impacts of a Project and the related projects in the surrounding area, when taken as a whole, would substantially diminish the number of historic resources within the same or similar context or property type. Specifically, cumulative impacts would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As discussed above, the Project does not include the removal of historic resources and is not located in the historic district. Although the new six-story building on Site 3 would obscure the view of the Brynmoor Apartments Neon Roof Sign from Vermont Avenue, the Project would not result in a substantial adverse change to the Brynmoor Apartments Neon Roof Sign or its immediate surroundings to the degree its eligibility as a resource would be materially impaired. It would continue to possess all aspects of integrity, including setting, and would continue to be eligible for listing as historical resource defined by CEQA. Furthermore, any future related projects would need to be analyzed on a case-by-case basis, with a determination made for each related project on the significance of indirect impacts to historic resources (in particular, to the Brynmoor Apartments Neon Roof Sign), as well as any future historic resources that are identified in the vicinity. If necessary, the applicants of future related projects would be required to implement appropriate mitigation measures. Therefore, Project impacts to the historic resources in the vicinity of the Project would not be cumulatively considerable, and cumulative impacts would be less than significant.

**PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS**

Project Design Features

No specific Project Design Features are proposed relevant to historical resources.

\textsuperscript{59} Ibid., page 32.
Regulatory Requirements

No significant impacts related to historical resources have been identified; and no regulatory compliance measures are required.

MITIGATION MEASURES

Because the Project’s impacts would be less than significant, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to historical resources would be less than significant.

Cumulative impacts related to historical resources would be less than significant.
4.3 CULTURAL RESOURCES
4.3.2. ARCHAEOLOGICAL RESOURCES

INTRODUCTION

This subsection evaluates the Project’s impacts to archaeological resources and human remains associated with the development of the Project Sites. The analysis is based on information provided in the archaeological data search prepared by the South Central Coastal Information Center, Department of Anthropology, California State University at Fullerton, dated March 6, 2017. This information is included as Appendix 4.3-2 to this Draft EIR. Analysis of potential impacts to tribal cultural resources is provided in Section 4.15 of this Draft EIR.

ENVIRONMENTAL SETTING

Archaeological Resources

The South Central Coastal Information Center conducted a data search for archaeological resources at the Project Sites as well as within a half-mile radius of the Project Sites on a USGS 7.5-minute quadrangle. The search included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest, the California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places (the “National Register”), the California State Historic Properties Directory, and the City of Los Angeles Historic-Cultural Monuments (“LAHCM”) listings were reviewed for the Project Sites and a half-mile radius.

The results of the search are presented in Table 4.3.2-1 (Archaeological Resources Search Results). Due to the sensitive nature of cultural resources, archaeological site locations are not released.60

<table>
<thead>
<tr>
<th>Search</th>
<th>Within Project Sites</th>
<th>Within half-mile radius of Project Sites</th>
</tr>
</thead>
<tbody>
<tr>
<td>Archaeological Resources</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Built-Environment Resources</td>
<td>0</td>
<td>40</td>
</tr>
<tr>
<td>Reports and Studies</td>
<td>0</td>
<td>45</td>
</tr>
<tr>
<td>OHP Historic Properties Directory</td>
<td>0</td>
<td>31</td>
</tr>
<tr>
<td>California Points of Historical Interest</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>California Historical Landmarks</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>California Register of Historical Resources</td>
<td>0</td>
<td>13</td>
</tr>
<tr>
<td>National Register of Historic Places</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Archaeological Determinations of Eligibility</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>City of Los Angeles Historic-Cultural Monuments</td>
<td>0</td>
<td>11</td>
</tr>
</tbody>
</table>

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60 Archaeological Data Search for the Vermont Corridor Project, Stacy St. James and Isabela Kott, South Central Coastal Information Center (SCCIC), March 6, 2017. Note: Sites 1, 2, and 3 were analyzed as one consolidated project site by the SCCIC.
### Table 4.3.2-1
Archaeological Resources Search Results

<table>
<thead>
<tr>
<th>Search Results</th>
<th>Within Project Sites</th>
<th>Within half-mile radius of Project Sites</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source: Archaeological Data Search for the Vermont Corridor Project, Stacy St. James and Isabela Kott, South Central Coastal Information Center, March 6, 2017.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The records search notes that, based upon the known archaeological sensitivity in the surrounding area, buried historic cultural resources may be present, and suggests that, in order to identify any previously unidentified cultural resources, an archaeological monitor should be in place for ground-disturbing activities.

### Regulatory Framework

#### State

**California Environmental Quality Act**

CEQA requires the lead agency to consider whether a project will have a significant effect on unique archaeological resources and to avoid unique archaeological resources when feasible or mitigate any effects to less-than-significant levels per PRC Section 21083.2. PRC Section 21083.2 also deals with the definitions of unique and non-unique archaeological resources. According to PRC Section 21083.2(g), a unique archaeological resource is defined as an “artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or

3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.”

Furthermore, if a unique archaeological resource were to be discovered during construction of a project, adherence to the following protocol is required:

- The County of Los Angeles, Department of Regional Planning (for Sites 1 and 3), and Department of City Planning, Office of Historic Resources (for Site 2) shall be notified of the discovery. Work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Construction activity may continue unimpeded on other portions of the Project Site.

- Personnel of the Project shall be prohibited from collecting or moving any archaeological materials and associated materials.

- The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.
In addition, according to State CEQA Guidelines Section 15064.5, all human remains are a significant resource. This section also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are discussed within PRC Section 5097.98 (see discussion below).

*Archaeological Resources Protection Act of 1979*

According to the Archaeological Resources Protection Act of 1979, the term “archaeological resource” means any material remains of past human life or activities that are of archaeological interest, as determined under uniform regulations promulgated pursuant to this act. Under such regulations, archaeological resources include, but are not limited to: pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Non-fossilized and fossilized paleontological specimens, or any portions or piece thereof, are not considered archaeological resources unless found in an archaeological context. No item will be treated as an archaeological resource unless such item is at least 100 years of age. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources, which meet the criteria for historical resources, as discussed above, or which constitute unique archaeological resources.

*California Public Resources Code Section 5097.98*

PRC Section 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the State CEQA Guidelines.

*California Health and Safety Code Section 7050.5*

Under Health and Safety Code Section 7050.5, if human remains are discovered during any project activity, the county coroner must be notified immediately. If human remains are exposed, Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to the origin and disposition pursuant to PRC Section 5097.98. Construction must halt in the area of the discovery of human remains, the area of discovery shall be protected, and consultation and treatment shall occur as prescribed by law. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98 will immediately notify those persons it believes to be most likely descended from the deceased person so that they can inspect the burial site and make recommendations for treatment or disposal.

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Local

Los Angeles County General Conservation and Natural Resources Element

Chapter 9: Conservation and Natural Resources Element of the County of Los Angeles General Plan, adopted in October 2015, provides goals and policies for the protection of the following conservation areas: Open Space Resources; Biological Resources; Local Water Resources; Agricultural Resources; Mineral and Energy Resources; Scenic Resources; and Historic, Cultural and Paleontological Resources.

City of Los Angeles General Plan Conservation Element

Section 3 of the Los Angeles General Plan Conservation Element, adopted in September 2001, includes policies for the protection of archaeological and paleontological resources. As stated in the Conservation Element, it is the City’s policy that archaeological resources be protected for research and/or educational purposes. It is also the City’s policy that paleontological resources be protected for historical, cultural research and/or educational purposes. Section 3 sets as an objective the identification and protection of significant paleontological sites and/or resources known to exist or that are identified during “land development, demolition, or property modification activities.” Section 5 of the Conservation Element recognizes the City’s responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.62

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts to archaeological resources, an archaeological data search was prepared by the South Central Coastal Information Center at California State University, Fullerton. The South Central Coastal Information Center data incorporates a review of technical records of previous studies and findings related to archaeological resources. The data provided in this report was used to inform the environmental setting at the Project Sites for archaeological resources as well as the probability of potential impacts to archaeological resources from implementation of the Project. The report’s findings, in addition to the thresholds of significance enumerated below, formed the basis of the impact determination. The archaeological data search prepared by the South Central Coastal Information Center, Department of Anthropology, California State University at Fullerton, dated March 6, 2017 is included in this Draft EIR as Appendix 4.3-2. As discussed in Section 4.3-1 above, none of the Project Sites has been identified as an historical resource.

Thresholds of Significance

The potential for the proposed Project to result in impacts to archaeological resources is based on the CEQA significance thresholds set forth in Appendix G of the State CEQA Guidelines.

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Threshold 4.3.2-1: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines?

Threshold 4.3.2-2: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

An affirmative answer to either of these questions would constitute a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreational center, and on-site parking. Project development would require excavations for the construction of underground parking facilities.

Impact Analysis

Threshold 4.3.2-1: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines?

The results of the South Central Coastal Information Center’s archaeological records search for the Project indicate that there are no known archaeological resources on the Project Sites. As such, the Project Sites have not yielded, nor are they likely to yield, information important in prehistory. Therefore, the Project Sites would not be considered historical resources in accordance with CEQA Guidelines Section 15064.5(a)(3)(D). Further, the Project Sites have not been identified as historical resources as discussed in Section 4.3-1 above. One archaeological site is located within a half-mile radius of the Project Sites (see Table 4.3.2-1, above). Because the Project Sites have been previously developed and the archaeological records search does not identify any potential resources within the Project Sites, an on-site archaeological survey has not been conducted specifically for the Project Sites. Nevertheless, construction activities would involve excavation below existing grade up to depths of approximately 28 feet to construct the subterranean levels at each Project Site and, thereby, create a potential to disturb any previously undiscovered archaeological resources. The archaeological records search recommends that, in order to identify any previously unidentified cultural resources, an archaeological monitor should be in place for ground-disturbing activities. Mitigation Measure MM CU-1 provides that a qualified professional archaeologist shall monitor all ground disturbing activities of the Project. If a unique archaeological resource were to be discovered during construction of the Project, adherence to Regulatory Requirement RR CU-1, and the ceasing of all ground disturbing activities within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines would ensure that potentially significant impacts would not result. Therefore, impacts on archaeological resources would be less than significant.

Threshold 4.3.2-2: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

No known human burials have been identified on the Project Sites or in recorded resources located within one-half mile of the Project Sites. The Project would require excavation to potential depth of 28 feet below the existing grade to construct the subterranean parking levels and foundation elements of the Project. As such, it is possible that human remains could be discovered during construction activities. Since human remains could be located subsurface, impacts to these resources would be unknown until
encountered during excavation. Mitigation Measure MM CU-1 provides that a qualified professional archaeologist shall monitor all ground disturbing activities of the Project. If human remains are encountered unexpectedly during construction demolition and/or grading activities, compliance with Regulatory Requirement RR CU-2 would ensure that significant impacts do not result. Therefore, impacts on human remains would be less than significant.

CUMULATIVE IMPACTS

The study area for cumulative impacts to archaeological resource and human remains is within the two-mile radius of the Project Sites for the related projects (as listed in Section 3.0, Project Description and Environmental Setting). In this area, Project construction activities could disturb or destroy previously unknown archaeological resources and, thereby, contribute to the progressive loss of these resources, or may discover previously unknown human remains. Development of the related projects could have impacts if archaeological resources and/or human remains were found during construction activities. However, similar to Project, it is reasonably anticipated that the related projects would comply with the existing regulatory requirements related to the inadvertent discovery of archaeological resources at a project site, and the existing State law related to discovery of human remains.

As discussed above, compliance with existing regulatory requirements related to archaeological resources or human remains would reduce Project-related impacts through the monitor of all ground disturbing activities of the Project. The regulatory requirement RR CU-1 related to archaeological resources includes monitoring, treatment of any discovered cultural resources, preparation of a final report, and curation of discovered materials in an approved facility. The existing regulatory requirement related to discovery of human remains includes halting work at the site and immediately contacting the County Coroner. With compliance with existing regulations cited above and implementation of MM-CU-1, the incremental effects of the Project would not result in a cumulatively considerable contribution to a significant cumulative impact on archaeological resources or human remains, and impacts would be reduced to a level of less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No Project Design Features related to archaeological resources have been identified.

Regulatory Requirements

RR CU-1: If a unique archaeological resource were to be discovered during construction of a project, adherence to the following PRC Section 21083.2 protocol is required:

- The County of Los Angeles, Department of Regional Planning (for Sites 1 and 3), and Department of City Planning, Office of Historic Resources (for Site 2) shall be notified of the discovery. Ground-disturbing activities shall cease within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Construction activity may continue unimpeded on other portions of the Project Site.

- Construction personnel of the Project shall be prohibited from collecting or moving any archaeological materials and associated materials.
• The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

**RR CU-2:** California Health and Safety Code Section 7050.5 establishes specific requirements that must be followed in the event that human remains are discovered during excavation activities. The requirements include, but are not limited to the following procedure that shall be observed:

• Cease ground-disturbing activities and contact the County Coroner immediately.
  - If the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner has 24 hours to notify the NAHC.
• The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
• The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
• If the owner does not accept the descendant’s recommendations, the owner or the descendent may request mediation by the NAHC.

Impacts to archaeological resources and human remains would be less than significant with the compliance of the existing regulatory requirements cited above.

**MITIGATION MEASURES**

**MM CU-1:** A qualified professional archaeologist shall monitor all ground disturbing activities of the project. If buried unique archaeological resources are discovered during ground-disturbing activities, work shall cease within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, invoke appropriate treatment measures. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered unique archaeological resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.

**LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With the implementation of MM CU-1, Project impacts related to archeological resources would be less than significant.
With the implementation of MM CU-1, cumulative impacts related to archeological resources would be less than significant.
4.3 CULTURAL RESOURCES
4.3.3. PALEONTOLOGICAL RESOURCES

INTRODUCTION

This subsection evaluates the Project’s potential impacts to paleontological resources associated with development of the Project Sites. The analysis is based on information provided in the vertebrate paleontology records check prepared by the Natural History Museum of Los Angeles County, dated February 23, 2017. This information is included in Appendix 4.3-3 to this Draft EIR.

ENVIRONMENTAL SETTING

Existing Conditions

Paleontological resources are limited, nonrenewable, sensitive scientific resources, including fossils preserved either as impressions of soft (fleshy) or hard (skeletal) parts, mineralized remains of skeletons, tracks, or burrows, or other trace fossils, coprolites (fossilized excrement), seeds or pollen, and other microfossils from terrestrial, aquatic, or aerial organisms.

Based on the paleontology records check prepared by the Natural History Museum of Los Angeles County, dated February 23, 2017 (Appendix 4.3-3 to this Draft EIR), in surface deposits of the northwestern part of Site 1 and most or all of Site 3, consist of younger Quaternary Alluvium. The remainder of Site 1 and all of Site 2 have surface deposits composed of older Quaternary Alluvium. The uppermost layers of Quaternary Alluvium in this general portion of Los Angeles usually do not contain significant vertebrate fossils, but vertebrate fossils do occur at varying depths. The closest vertebrate fossil locality from older Quaternary deposits, situated approximately 1.0 mile west of the Project area near the intersection of Wilshire Boulevard and Serrano Avenue, produced a fossil specimen of mammoth, Mammuthus, at a depth of 65 feet below grade. Approximately 1.8 miles northwest of the Project area, near the intersection of Western Avenue and Council Street, also from these older Quaternary sediments, a find produced a specimen of fossil mastodon, Mammutidae, at a depth of only five to six feet below the surface. Approximately 1.5 miles north of the Project area, at the intersection of Madison Avenue and Middlebury Street, a find produced a fossil specimen of mammoth, Mammuthus, at a depth of about eight feet below street level.

The very northwestern portion of Site 3 may contain exposures of the marine late Miocene Puente Formation (also sometimes referred to as the Upper Modelo Formation or as an unnamed shale in this area). Exposed in the surrounding elevated terrain, these Puente Formation deposits also probably underlie the Quaternary Alluvium in the Project area. Just south of the Project area, around the intersection of Vermont Avenue and Wilshire Boulevard, are vertebrate fossil localities from the Puente Formation discovered during excavation for the Metrorail Wilshire / Vermont station at a depth of 60 to 80 feet beneath the surface. Fossil specimens of eels, Anguilliformes, and needlefishes, Belonidae, were recovered at this location, along with an extensive fauna of fossil fish. A list of the fossil fish taxa from this location can be found in Appendix 4.3-3 to this Draft EIR.  

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63 Samuel A. McLeod, Ph.D., Vertebrate Paleontology, Natural History Museum of Los Angeles County (NHMLAC), Vertebrate Paleontology Records Check for paleontological resources for the proposed Vermont Corridor Project,
Regulatory Framework

State

California Public Resources Code (PRC) Sections 21000-21189 (CEQA Statute) require the lead agency to determine whether the proposed development project would have a significant impact on the environment. Paleontological resources cannot be replaced once they are destroyed, and therefore, paleontological resources are considered nonrenewable scientific resources and are protected under CEQA. According to Appendix G to the State CEQA Guidelines, a project could have a significant effect if it would directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature. PRC Section 21083.2 directs a lead agency to determine whether a project may have a significant effect on unique archaeological resources, which can also be interpreted to include buried paleontological resources. As set forth in PRC Section 21083.2, if the lead agency determines that the project may have a significant effect on unique archaeological [paleontological] resources, the EIR shall address the issue of those resources. Unique archaeological [paleontological] resources are defined in PRC Section 21083.2(g) as an “artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

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

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts to paleontological resources, a vertebrate paleontology records check was prepared by the Natural History Museum of Los Angeles County. The Natural History Museum reviews technical records of previous studies and findings related to paleontological resources on the Project Sites and in the area of the Project Sites. The data provided in this letter report was used to inform the environmental setting at the Project Sites for paleontological resources as well as the probability of potential impacts to the paleontological resources from implementation of the Project. The letter report’s findings, in addition to the thresholds of significance enumerated below, formed the basis of the impact determination. The report is attached to this Draft EIR as Appendix 4.3-3.

Thresholds of Significance

The potential for the proposed Project to result in impacts to paleontological resources is based on the CEQA significance thresholds set forth in Appendix G of the State CEQA Guidelines.
Threshold 4.3.3-1: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

An affirmative answer to this question would constitute a significant impact.

**Project Design Elements**

The Project would include governmental offices, commercial retail, multi-family residential, community recreational center, and on-site parking. Project development would require include excavations for the construction of underground parking facilities. No specific design features would be included with respect to paleontological resources. MM CU-1 provides that ground disturbing activities shall be monitored by an archaeologist, which would also allow for discovery of subsurface paleontological materials, if present.

**Impact Analysis**

Threshold 4.3.3-1: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Findings of the paleontological resource records search from the Natural History Museum of Los Angeles County (NHMLAC) reveal that there are no known fossil records associated with the Project Sites. As such, the Project Sites have not yielded, nor are they likely to yield, information important in prehistory. Therefore, the Project Sites would not be considered historical resources in accordance with CEQA Guidelines Section 15064.5(a)(3)(D). Further, the Project Sites have not been identified as historical resources as discussed in Section 4.3-1 above.

Shallow excavations of only a few feet in the Quaternary Alluvium exposed in all or almost all of the Project area may not encounter any significant fossil vertebrate remains due to the fact that the Project Sites have been previously excavated and graded. However, deeper excavations that extend down into older deposits may encounter significant vertebrate fossil remains. This is due to the fact that excavation activities, which may achieve depths of up to approximately 28 feet for the proposed subterranean levels, may extend farther into the underlying geologic materials than the previous activity at the Project Sites.

If a unique paleontological resource were to be discovered during construction of the Project, adherence to Regulatory Requirement RR CU-3, and the ceasing of all ground disturbing activities of the find until a qualified paleontologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2 would ensure that potentially significant impacts would not result. Therefore, impacts on paleontological resources would be less than significant.

**CUMULATIVE IMPACTS**

The study area for cumulative impacts to paleontological resources is within the two-mile radius of the development sites for the related projects (as listed in Section 3.0 Project Description and Environmental Setting). Development of the related projects could have impacts if paleontological resources were found during construction activities. However, similar to the Project, it is anticipated that these related projects would comply with the existing regulatory requirement related to the discovery of previously unknown paleontological resources.

As discussed above, compliance with existing regulatory requirements related to paleontological resources would reduce Project-related impacts through the monitor of all ground disturbing activities of the Project. The regulatory requirement RR CU-3 related to paleontological resources includes treatment...
of any discovered cultural resources, preparation of a final report, and curation of discovered materials in an approved facility. With the compliance of existing regulations cited above, the incremental effects of the Project would not result in a cumulatively considerable contribution to a significant cumulative impact on paleontological resources, and impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to paleontological resources.

Regulatory Requirements

RR-CU-3: If a unique paleontological resource were to be discovered during construction of a project, PRC Section 21083.2 requires adherence to the following protocol:

- The County of Los Angeles, Department of Regional Planning, and Department of City Planning, Office of Historic Resources shall be notified of the discovery. Work shall cease in the area of the find until a qualified paleontologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. The Developer shall choose the qualified paleontologist, subject to the approval of County of Los Angeles, Department of Regional Planning on Sites 1 and 3, and Department of City Planning, Office of Historic Resources on Site 2. Construction activity may continue unimpeded on other portions of the Project Site.

- Construction personnel of the Project shall be prohibited from collecting or moving any paleontological materials and associated materials.

- The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the paleontologist. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after treatment measures are implemented, the paleontologist shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered resources, the significance of the resources, and the treatment of the recovered resources. Any fossils recovered would be deposited in an accredited and permanent scientific institution.

MITIGATION MEASURES

No significant impacts related to paleontological resources have been identified; and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to paleontological resources would be less than significant.
Cumulative impacts related to paleontological resources would be less than significant.