

4.4 CULTURAL AND PALEONTOLOGICAL RESOURCES

4.4.1 INTRODUCTION

This section provides an analysis of the potential effects of the proposed project on cultural and paleontological resources. The section summarizes the findings of the Cultural Resource Assessment (LSA Associates, Inc. [LSA], July 2006), a Supplemental Research Memorandum (LSA Associates, Inc., April, 2008), the Paleontological Resource Assessment (LSA Associates, Inc., January 2005), and the Melrose Triangle Supplemental Historic Resources Assessment (LSA Associates, Inc., February 2011) (Appendix E).

4.4.2 METHODOLOGY

Cultural Resources

A records search was conducted at the South Central Coastal Information Center located at California State University, Fullerton; it included a review of all recorded historic and prehistoric archaeological sites within the project area. In addition, the National Register of Historic Places (National Register), California Register of Historic Resources (California Register), California Historical Landmarks, and California Points of Historical Interest were examined. Lastly, the Historic Properties Directory was consulted (HRI 2004).

Repositories at the Los Angeles Public Library, the City's Building and Safety Department, and the Los Angeles County Assessor's Office were contacted in order to identify known historic land uses and to review any research materials pertinent to the project area.

A field survey was completed in order to identify any cultural resources that may be impacted by the proposed project. The survey consisted of a visual inspection of all areas where ground surface was exposed. An inspection of all the buildings within the project area was also conducted. The buildings were photographed and documented. Architectural Historian Judith Marvin reviewed the photographs and documentation in order to assess the potential impacts of the proposed project on the buildings.

A supplemental field survey was conducted in February 2011 and included a visual inspection of the buildings from the public right of way, noting architectural character and alterations. A brief reconnaissance survey of the surrounding area was also conducted at that time to understand the project area's immediate context.

Paleontological Resources

A paleontological locality search was conducted through geological references and paleontological records maintained at LSA. It included a review of the area geology, any known paleontological resources recovered from the surrounding area, and the geologic formations that would likely be

encountered during excavation activities. The purpose of the locality search was to establish the status and extent of previously recorded paleontological resources within and adjacent to the project area.

A field survey was conducted and consisted of a visual inspection of exposed soil and ground surfaces. As most of the area is developed, the survey consisted of looking for and examining exposed soil in planter and landscaped areas. The purpose of this survey was to identify any paleontological resources that may be impacted by the proposed project. No additional field survey has been conducted since the entire project site is developed, the landscaped ground visibility within the project area was very limited, and because the site remains in the same developed condition that existed in 2004.

4.4.3 EXISTING ENVIRONMENTAL SETTING

The project site is generally flat and is in a developed urban area of the City. Four streets border the project site: Santa Monica Boulevard to the north, Melrose Avenue to the south, Doheny Drive to the west, and Almont Drive to the east. The project site is composed of commercial, office, and light industrial buildings and paved surfaces with ornamental vegetation.

The area surrounding the project site is composed of commercial properties, with residential uses nearby. These buildings appear to vary in age, with approximate construction dates ranging from the 1920s to the present. Beverly Gardens Park is located northwest of the project site across Santa Monica Boulevard.

Paleontological Resources

On July 7, 2004, a paleontological locality search was conducted through geological references and paleontological records maintained at LSA. It included a review of the area geology and any known paleontological resources recovered from the surrounding area, as well as the geologic formations that would likely be encountered during excavation on the project site. The purpose of the locality search was to establish the status and extent of previously recorded paleontological resources within and adjacent to the project site.

The project site is located at the northern end of the Peninsular Range geomorphic province, a 900-mile (1,450-kilometer) northwest-southeast trending structural block that extends from the tip of Baja California to the Transverse Ranges and includes the Los Angeles Basin. The Los Angeles Basin began to be formed during the early Miocene time (26 million years ago) on a continental margin. Up to 10 km of marine to alluvial sediments, ranging in age from the Late Miocene to the present, are deposited in the central portion of the Los Angeles Basin.

Within the project area, there are two recorded geologic units, Quaternary older alluvium and Pleistocene nonmarine sediments. Both these sediment types are essentially the same and represent alluvial sediments between 5,000 and 10,000 years old. Alluvium is a geologically recent deposit of gravel, sand, silt, or mud that was deposited by flowing water in a stream or river. It is found along old and active stream and river drainages and is usually loosely consolidated.

During construction of the Metro Red Line project in Los Angeles in the late 1990s, it is reported that Pleistocene fossils of horse, bison, mastodon, ground sloth, and wood were recovered from the older alluvial sediments. In addition, Late Miocene marine shale containing marine fish, invertebrates, and plants was recovered beneath the older alluvium in some areas of the Metro Line excavation. The Metro Red Line system is 4 to 5 miles east of the Melrose Triangle project site. In addition, the La Brea Tar Pits, 2 miles east of the project site, represent one of the most diverse Pleistocene fossil assemblages in the world.

Fossils are known in the Basin from excavations for roads, land use development, and quarries. Remains of Rancholabrean-type animals such as elephants, horses, bison, camels, sabertooth cats, deer, and sloths are known from these activities. There is a potential for these types of fossils in all older alluvial deposits. In addition, fossils from older upstream formations often are redeposited in these sediments. It appears that most fossils located within alluvial sediments within the Basin begin to occur at depths greater than 10 feet below ground surface.

Cultural Resources

Cultural Setting. The Gabrielino Indians were the first inhabitants to the area known today as the City of West Hollywood. The name *Gabrielino* refers to the Uto-Aztecan (Takic) speaking Native Americans who lived throughout the present Los Angeles and Orange County areas and who were historically affiliated with Mission San Gabriel Archangel. Gabrielino territory included the watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers; several smaller intermittent streams in the Santa Monica and Santa Ana Mountains; all of the Los Angeles Basin; the coast from Aliso Creek north to a point between Topanga and Malibu Creeks; and the islands of San Clemente, San Nicolas, and Santa Catalina. The current project area is located within Gabrielino territory.

The Gabrielino were hunters and gatherers who used both inland and coastal food resources. They hunted and collected seasonally available food resources and led a semisedentary lifestyle, often living in permanent communities along inland watercourses and coastal estuaries. In addition to permanent settlements, the Gabrielino occupied temporary campsites used seasonally for hunting, fishing, and gathering plant foods and shellfish.

The first western settlers to the area were the Spanish, who used the vast Los Angeles Pueblo holdings to graze sheep and cattle. In 1858, the area was granted to Antonio Jose Rocha as part of the Rancho La Brea land grant. In 1874, this land was acquired by Eugene R. Plummer. He built a six-room farmhouse and barn on the property. The land was used for farming many varieties of fruits and vegetables. Other farmers moved into the area, and soon, parcels were subdivided for residences.

The emergence of the Los Angeles Pacific Railroad in the 1890s brought significant development to the region. This rail line was developed to connect the center of the City to the beaches of Santa Monica. In 1896, the company's top executive, General Moses H. Sherman, purchased 5.56 acres of land in the area and brought the rail line into the region, along with barns, shops, and offices. The community was named "Sherman" in his honor. Sherman became the main railyard for the Los Angeles Pacific Railroad.

Beginning in the early 1900s, Beverly Hills and Hollywood began to develop into planned communities. Affordable land and the developing film industry ushered in new settlers to these

unincorporated areas of Los Angeles. Sherman was a prime location for new development, as it was less urbanized and more affordable than its neighbors. By the 1920s the community of Sherman came to be known as West Hollywood, forever distinguishing itself from its eastern neighbor. During this period, West Hollywood grew rapidly. The movie industry and the end of Prohibition created a demand for evening entertainment. Nightclubs, businesses, and shopping districts began to emerge along the main thoroughfares.

By the 1950s the City of West Hollywood was nearly completely developed. Many older buildings, including railroad properties and single-family residences, began to be demolished to make room for new development. The West Hollywood nightlife continued to be a famous attraction. Architecturally, the evening establishments began to mirror the flash styles seen along the Las Vegas Strip. Commercial and residential development was less extreme, with architecture following the Modern Style.

Records Search. A records search was conducted through the SCCI of CHRIS, located at the CSU Fullerton. The records search provided LSA with documentation for all previously recorded prehistoric and historic archaeological sites within a 0.5-mile radius of the project site, as well as a summary of known cultural resource survey and excavation reports. The 2006 record search was augmented with a review of a 2010 copy of the California Office of Historic Preservation's Historic Resources Inventory (HRI), which included resources that had been evaluated since 2006.

The results of the records search indicate that there are no previously recorded archaeological sites within the boundary of the project site. There are no properties listed on the National Register, California Register, California Historical Landmarks, or the California Points of Historical Interest on or within a 0.5-mile radius of the project site. In addition, no properties listed in the Historic Properties Directory (HRI 2004) match any of the addresses on site. However, the HRI listed 125 properties that have been evaluated for historical significance within a 0.5-mile radius of the Melrose Triangle project site. Seven cultural resource studies and/or reports have been completed for projects that were within 0.5 mile of the project site. None of the areas evaluated in these reports include the project site.

Field Survey. On June 2, 2004, a field survey of the project site was conducted. The project site consists of a relatively flat triangular parcel of land. No archaeological resources were observed during the field survey. The project site is developed and urbanized, and there was very limited to no ground visibility on the project site. A total of 10 buildings were identified on site. Most of these buildings appeared to be constructed during the 1960s to the 1990s. Two buildings were older than 50 years in age: 633 North Almont Drive and 9080 Santa Monica Boulevard. The Cultural Resource Assessment evaluated these buildings for the California Register and provided a historical overview for the setting, as follows:

633 North Almont Drive. This is a simple one-story brick and stucco building that has been completely remodeled. According to building permit records, in 1950, an existing residence and garage were converted into office buildings. A 1950 Sanborn Fire Insurance map depicts two buildings on the property. In 1985, part of one of the buildings was demolished, and some time

later the two were joined. The existing building is a simple Modern Style wood-frame building with a rectangular mass. It has stucco and brick veneer walls and a rolled composition-clad roof. The primary entrance is on the north elevation through a modern wood door. A band of aluminum frame fixed windows hangs low along the primary facade. There is no fenestration on the east, west, or south elevations. A large bay door is located at the rear of the building. The building is in fair condition, but it is completely lacking in integrity.

9080 Santa Monica Boulevard. This two-story building featuring elements of the Streamline Moderne Style was constructed in 1928. It has a flat roof clad in tar and gravel, with ledge coping at the roof line. The walls are clad in stucco, which was reapplied during the 1980s. Fenestration consists of a mix of original and modern aluminum-frame fixed and casement windows. The first floor of the primary facade consists of a central recessed entry via a modern glass door beneath an aluminum door canopy. This central entrance is flanked by a continuous horizontal band of glass block windows on each side of the facade. The second story of this central part features vertical bands of aluminum fluting that run from the roof line to the top of the first-story door canopy. The second story of the facade has curved corners with glass block windows that continue around the walls. Multiple alterations to the property have occurred throughout the years, and several large additions have been made to the southern facade of the building. In 1981, the building was remodeled; glass doors and windows were replaced; a new stucco facade was applied; second-story additions were made; and ceramic tile was added to the facade. The building is on a level part of the project site, facing north toward Santa Monica Boulevard. The building is in good condition and retains its integrity. The building appears to be eligible for the California Register under Criterion 3 as a fine example of Streamline Moderne architecture.

During circulation of the original Draft EIR in 2008, the West Hollywood Historic Preservation Commission requested further research on the building at 9080 Santa Monica Boulevard. This supplemental research was documented in a memorandum prepared by LSA in April 2008. Building permits for a veterinary clinic at 9088 Santa Monica Avenue (the former address of the building at 9080 Santa Monica Boulevard) were obtained in 1928. In 1938, the owner obtained another building permit to make alterations to the veterinary clinic. The architectural firm of Wurdeman and Becket was retained to design the alterations in the Streamline Moderne style. Walter Wurdeman and Welton Becket were notable Los Angeles architects whose works included the Pan-Pacific Auditorium (destroyed by fire in 1989) and many important examples of Mid-Century Modern architecture.

Supplemental Historic Research. In February 2011, LSA prepared a supplemental historic resource assessment for the proposed project. This assessment surveyed and evaluated three buildings that have become potentially historic-age (50 years old or older) since the initiation of planning for the proposed project: 617 North Almont Drive, 9056–9060 Santa Monica Boulevard, and 9021 Melrose Avenue. The field survey of the three previously unevaluated historic-era properties included a visual inspection of the buildings from the public right of way, noting architectural character and alterations. Following the survey, LSA conducted supplemental archival research on the previously unevaluated properties. The original historic context statement was not expanded, but property-specific research is included in the results section below. The Supplemental Historic Research Memorandum evaluated

these buildings for the California Register and provided a historical overview for the setting, as follows:

9056–9060 Santa Monica Boulevard. This three-story commercial/retail building was constructed in phases between 1959 and 1962 in the Mid-Century Modern style of architecture. It is rectangular in plan with a flat roof and stucco siding. The ground floor is divided into 11 storefronts, and what would be the 12th storefront is instead a portal through the building to a parking lot. Each storefront is characterized by a painted aluminum and glass storefront, modestly landscaped with a low concrete planter bearing shrubbery. A concrete block screen supported by a metal frame blocks the Floors 2 and 3 from view. The screen, which bears a repeating “starburst” pattern, replaced a gold anodized aluminum screen accented with multicolored mosaic tiles.¹ Fenestration on the upper floors of the building includes aluminum horizontal-sliding windows set flush with the wall with no trim. The primary entrance is set at the center of the front facade, through an aluminum and glass storefront recessed beneath the upper stories, trimmed with a terrazzo floor. A second entrance is located in the right 1/3 of the building and leads completely through to the parking lot behind the building. Two external stairwells with terrazzo-covered risers are located on the front facade next to the entrances, but are mostly obscured by the screen. A mechanical room is located on the roof at the center of the building. Due to the replacement of the original screen with a concrete block wall, the building no longer retains historic architectural integrity.

9021 Melrose Avenue. This three-story commercial/retail building was constructed between 1959 and 1962 in the Mid-Century Modern style. It has a rectangular massing with a flat roof and stucco siding. The front facade is screened by horizontal bands of metal mesh, divided vertically by metal beams. The ground floor features a two-story glass storefront trimmed with wood (heavily altered) and a portal to a parking lot behind the building. Fenestration includes aluminum horizontal sliding windows on the rear elevation and aluminum sliders and panels of aluminum sliding and fixed windows on the front behind the screen. The building has sustained significant alterations, including complete remodeling of the storefront, and no longer retains historic architectural integrity.

617 North Almont Drive. This one-story commercial/retail building was constructed in 1958. It is irregular in plan due to a larger rear section that extends approximately 10 feet on the south side. The building is constructed of concrete block with a flat roof. The facade is characterized by a thick layer of textured stucco covering the facade, large undivided picture windows, and a faux Spanish-style door. The front facade joins the building to a neighboring commercial building, which was constructed in 1977. A separate entrance provides access to the rear section of the property via a pair of divided light metal doors. Overall, the building does not appear to retain historic architectural integrity due to the remodeling of the facade.

¹ “Completion of three buildings noted.” *Los Angeles Times*, February 4, 1962. Available through Proquest via the Los Angeles Public Library. Accessed March 17, 2011.

4.4.4 REGULATORY SETTING

This section describes the cultural resource requirements of the National Historic Preservation Act (NHPA), CEQA, California Health and Safety Code, California Public Resources Code (PRC), the City's Cultural Heritage Preservation Ordinance, and the Historic Preservation Element of the City's General Plan.

Federal Regulations

National Historic Preservation Act. Enacted in 1966, the NHPA established the National Register program under the Secretary of the Interior. A cultural resource is evaluated for eligibility for listing in the National Register under four criteria. These criteria generally require that the resources be 50 years of age or older and significant at the local, State, or national level under one or more of the following criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history;
- It is associated with the lives of persons significant in our past;
- It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; possesses high artistic values; or represents a significant and distinguishable entity whose components lack individual distinction; or
- It has yielded, or has the potential to yield, information important to the prehistory of history of the local area, California, or the nation.

The National Register also requires that a resource possess integrity, which is defined as "the ability of a property to convey its significance." The aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. Determination of which of these factors are most important will depend on the particular National Register criterion under which the resource is considered eligible for listing.

State Regulations

PRC Section 5097.5. PRC Section 5097.5 provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

California Register of Historic Resources. The California Register criteria are nearly identical to those for the National Register, which are listed above. For a property to be eligible for inclusion on the California Register, one of the following criteria must be met:

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;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The State Historic Preservation Office (SHPO) maintains the California Register. Properties listed, or formally designated eligible for listing, on the National Register are nominated to the California Register and then selected to be listed on the California Register, as are State Landmarks and Points of Interest.

CEQA Requirements. Historical resources are recognized as part of the environment under CEQA (PRC Sections 21002(b), 21083.2, and 21084.1). CEQA defines a “historical resource” as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register); (2) listed in a local register of historical resources as defined in PRC Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project’s Lead Agency (PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a)). A historical resource consists of:

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.... Generally, a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing on the California Register of Historical Resources (CEQA Guidelines Section 15064.5(a)(3)).

In accordance with CEQA Guidelines Section 15064.5(b), a substantial adverse change in the significance of a historical resource is a significant effect on the environment.

California Health and Safety Code Section 7050.5. California Health and Safety Code (HSC) Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner’s authority. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant

(MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

Local Regulations

West Hollywood Cultural Heritage Preservation Ordinance. The City has adopted a Cultural Preservation Ordinance (WHMC Chapter 19.58) in order to identify and protect historic structures, improvements, natural features, objects, sites, and areas of significance located within the City and that are threatened with alteration, demolition, or removal. Under the City Ordinance, a property may be designated a cultural resource if it meets one of the designation criteria:

- **Exemplifies Special Elements of the City.** It exemplifies or reflects special elements of the City's aesthetic, architectural, cultural, economic, engineering, political, natural, or social history and possesses an integrity of design, location, materials, setting, workmanship feeling, and association in the following manner:
 1. It embodies distinctive characteristics of a period, method, style, or type of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
 2. It contributes to the significance of a historic area by being:
 - a. A geographically definable area possessing a concentration of historic or scenic properties; or
 - b. A thematically related grouping of properties that contribute to each other and are unified aesthetically by plan or physical development; or
 3. It reflects significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning; or
 4. It embodies elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation; or
 5. It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the City; or
- **Example of Distinguishing Characteristics.** It is one of the few remaining examples in the City, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen; or
- **Identified with Persons or Events.** It is identified with persons or events significant in local, state, or national history; or
- **Notable Work.** It is representative of the work of a notable architect, builder, or designer. (WHMC Section 19.58.050.)

City of West Hollywood General Plan. The City of West Hollywood's General Plan includes a Historic Preservation Element with objectives and policies to help preserve the cultural and historic resources within the City. The City's General Plan includes the following objectives and policies applicable to the proposed project:

HP-2: Continue to identify and evaluate cultural resources.

HP-3: Protect cultural resources from demolition and inappropriate alterations.

HP-3.2 Ensure the protection of cultural resources through enforcement of existing codes.

HP-3.6 Suspend development activity when archaeological resources are discovered during construction. The project sponsor will be required to retain a qualified archaeologist to oversee the handling of resources in coordination with appropriate local and State agencies and organizations and local Native American representatives, as appropriate.

HP-3.7 Continue to coordinate with City staff from various fields so that historic preservation goals are recognized, taking into consideration the implications historic preservation can have on other established City goals.

HP-4: Increase the public's awareness of the City's history and cultural resources.

HP-4.1 Continue to educate the public about the history of West Hollywood.

HP-4.2 Continue to memorialize significant people, places, and events in the history of West Hollywood through plaques and public art.

4.4.5 THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance criteria are based on Appendix G of the CEQA Guidelines. Based on these thresholds, implementation of the proposed project would have a significant impact on cultural and paleontological resources if it would:

Threshold 4.4.1: Cause a substantial adverse change in the significance of a historical resources as defined in Section 15064.5;

Threshold 4.4.2: Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5;

Threshold 4.4.3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or

Threshold 4.4.4: Disturb any human remains, including those interred outside of formal cemeteries.

4.4.6 PROJECT IMPACTS

Threshold 4.4.1: Would the proposed project cause a substantial adverse change in the significance of a historical resources as defined in Section 15064.5?

Potentially Significant Impact

Historic Resources. Implementation of the proposed project would involve demolition of existing buildings, excavation, and grading on the project site that could potentially adversely impact on-site resources. The proposed project would include removal of all structures onsite. The CEQA Guidelines require that “a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing on the California Register of Historical Resources.”¹

Although the building at 633 North Almont Drive is in good condition, it is completely lacking in integrity, as there is no visible remnant of the original structures. Therefore, the building was determined not eligible for listing on the National Register, the California Register or for designation as a City of West Hollywood Landmark, because it does not meet any of the required criteria, and in particular lacks architectural integrity. The project-related impacts to this building would not be considered significant and do not require additional evaluation.

Similarly, the buildings located at 9056–9060 Santa Monica Boulevard, 9021 Melrose Avenue, and 617 North Almont were determined not to be eligible for listing in the National Register, the California Register, or for Designation as a City of West Hollywood Landmark. Although the office/retail complex at 9056–9060 Santa Monica/9021 Melrose Avenue was designed by B.A. Berkus & Associates, it has been significantly altered since it was designed. Most notably, replacement of the original gold-anodized aluminum and mosaic tile screen with concrete blocks completely compromised the integrity of the original design. Overall, the building does not appear to retain historic architectural integrity due to the remodeling of the facade. Similarly, the building at 9021 Melrose Avenue has sustained significant alterations, including complete remodeling of the storefront, and no longer retains historic architectural integrity. The front facade of the building at 617 North Almont joins the building to a neighboring commercial building, which was constructed in 1977. Overall, the 617 North Almont building does not appear to retain integrity due to the remodeling of the façade. Therefore, the project-related impacts to these buildings would not be considered significant and do not require additional evaluation.

Research on the building at 9080 Santa Monica Boulevard found that building permits for a veterinary clinic at 9088 Santa Monica Avenue (the former address of the building at 9080 Santa Monica Boulevard) were obtained in 1928. In 1938, the owner obtained another building permit to make alterations to the veterinary clinic. The architectural firm of Wurdeman and Becket was retained in 1938 to design building alterations in the Streamline Moderne style. Walter Wurdeman and Welton Becket were notable Los Angeles architects whose works included the Pan-Pacific Auditorium (destroyed by fire in 1989) and many important examples of Mid-Century Modern architecture.

¹ Title 14 CCR Section 15064.5(a)(3).

The building at 9080 Santa Monica Boulevard is in good condition and retains its integrity on the primary facade. The building appears to be eligible for local listing as a historic resource by the City, as well as eligible for listing on the California Register under Criterion 3 as a fine example of Streamline Moderne architecture and through association with the work of a master (architects Walter Wurdeman and Welton Becket). The information discovered through archival research has been documented on a Department of Parks and Recreation (DPR) Site Update form, which will be filed with the South Central Coastal Information Center at CSU Fullerton.

The proposed project would demolish and remove the building from the project site. Alteration of buildings determined eligible for the National or California Registers through demolition, destruction, relocation, or alteration of the resource in such a way as to compromise its eligibility for local and State listing is considered a significant adverse impact (CEQA Guidelines Section 15064.5(b)). Therefore, demolition of the building at 9080 Santa Monica Boulevard would be considered a significant adverse impact of the proposed project.

Mitigation Measures CULT-1 and CULT-2, provided below, require photographic documentation of the building's exterior elevations and character-defining features and memorialization of the building at 9080 Santa Monica Boulevard in the project design. While implementation of these measures would reduce and minimize the proposed project's impacts on this resource, impacts would remain significant and unavoidable due to the building's removal from the site.

This Recirculated Draft EIR includes a project alternative that avoids removal of the building at 9080 Santa Monica Boulevard. See Chapter 5.0 for a discussion of project alternatives.

Threshold 4.4.2: Would the proposed project cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5?

Potentially Significant Impact

Archaeological Resources. As discussed earlier, no archaeological resources were identified on site through the records search or field survey. However, the project site may contain unknown subsurface archaeological resources. Because the project area has been developed for over 100 years, very little is known about the prehistoric use of the area. Archaeological resources on the project site, if any, could be significantly adversely impacted by project construction, and in particular excavation activities. As such, monitoring should be conducted during project construction to avoid impacts to potentially significant archaeological resources. Mitigation Measure CULT-3, provided below, requires cultural resource monitoring during construction of the proposed project. Implementation of Mitigation Measure CULT-3 would reduce impacts on archaeological resources to less than significant, and no additional mitigation is required.

Threshold 4.4.3: Would the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact

Paleontological Resources. Although no paleontological resources were identified during the field survey for the proposed project, based on the results of the locality search, sensitive paleontological

sediments that can contain fossil remains may exist within the project area, and there is the potential to encounter paleontological resources during ground-disturbing activities. Because most fossils in alluvium/older alluvium within the Los Angeles Basin are generally not encountered until a depth of 10 feet is reached, sediments within the project area are assigned a rating of “high B.” Mitigation is required to reduce potential adverse impacts to unknown (buried) paleontological resources.

Mitigation Measure CULT-5 requires the Applicant to retain a qualified paleontologist to prepare a standard Paleontological Resources Impact Mitigation Program (PRIMP). This program would include excavation monitoring and specimen recovery, including screen washing, preparation, identification, and curation of collected specimens into a museum repository. Depending on the significance of any recovered specimens, the qualified paleontologist could allow for monitoring to be scaled back to part time as the proposed project progresses. However, if significant fossils begin to be recovered after monitoring has been scaled back, the PRIMP would require increased monitoring as necessary. A final report would provide details of monitoring and curation methods, fossil identification, and discussion, cataloging, and repository arrangements. Implementation of Mitigation Measure CULT-5 would reduce potential impacts to unknown paleontological resources to less than significant, and no additional mitigation is required.

Threshold 4.4.4: Would the proposed project disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Impact

Human Remains. No Native American or other human remains are known to exist on site. However, in order to avoid impacts to unrecorded or unknown resources, monitoring of the site would be conducted by an archaeologist during project grading, as required by Mitigation Measure CULT-3. In addition, Mitigation Measure CULT-4 contains standard provisions to be implemented if unrecorded human remains were encountered on the project site during construction. Implementation of these measures would reduce potential impacts to unknown or unrecorded cultural resources to less than significant, and no additional mitigation is required.

4.4.7 MITIGATION MEASURES

Historical Resources.

CULT-1 Prior to the demolition of the building at 9080 Santa Monica Boulevard, the Applicant shall prepare photographic documentation of the building’s exterior elevations and character-defining features subject to review and approval by the City’s Community Development Director or designee. The Applicant shall retain a professional photographer familiar with the recordation of historic buildings to prepare the photographic documentation. The photographs shall be in large format, black and white, archival processed, and prepared in a format consistent with the Historic American Buildings Survey (HABS) standards for large format and field photography. Copies of the recordation package shall be deposited with the City’s Historic Preservation Commission.

CULT-2 Prior to issuance of demolition or grading permits, the Applicant shall submit design and/or construction plans subject to review and approval by the City's Community Development Director or designee that illustrate how the building at 9080 Santa Monica Boulevard shall be permanently memorialized and incorporated into the proposed development on the site. The plans for the new buildings on site shall incorporate some of the character-defining features of the Streamline Moderne Style into the design. In addition, a pamphlet that discusses the general history of the project area and the Streamline Moderne Style shall be created. The pamphlet shall incorporate the additional research and the HABS photographs taken prior to demolition.

Archaeological Resources.

CULT-3 Prior to issuance of grading permits, the Applicant shall contract with a certified archaeologist to monitor all trenching and excavation activities, subject to the review and approval of the City's Community Development Director or designee. Should any archaeological resources be identified during the grading, trenching, or excavation, the certified archaeologist shall: (1) ascertain the significance of the resource, (2) establish a protocol with the City to protect such resources, pursuant to WHMC Section 19.58, (3) ascertain the presence of additional resources, and (4) provide additional monitoring of the site, if deemed appropriate.

Following completion of construction monitoring, the qualified archaeologist shall prepare a report of findings consistent with the requirements of the "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format Preservation Planning Bulletin."

On completion of project grading and excavation, the qualified archaeologist shall submit a report for review and approval by the City's Community Development Department. This report shall provide adequate documentation of any resources found on site during site preparation, grading, and excavation, following the guidelines in the Office of Historic Preservation "ARMR: Recommended Contents and Format Preservation Planning Bulletin."

CULT-4 If human remains are encountered during site preparation, grading, and/or excavation, all ground-disturbing activities within the area of the human remains shall cease and the County Coroner shall be notified. If the remains are determined to be of Native American descent, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours, which shall determine and notify a Most Likely Descendant (MLD) of the deceased Native American. The MLD shall have 48 hours to inspect the site of the discovery and to recommend to the Applicant or landowner means for the treatment and disposition of the human remains and any associated grave goods. The Applicant or landowner shall reinter the remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance, subject to the approval of the City's Community Development Director.

Paleontological Resources.

CULT-5 Prior to commencement of any grading activity on site, the Applicant shall retain a qualified paleontologist, subject to the review and approval of the City's Building Official, or designee. The qualified paleontologist shall be on site during all rough grading and other significant ground-disturbing activities in depths greater than 10 feet below ground surface.

The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP should be consistent with the guidelines of the Society of Vertebrate Paleontologists (SVP) (1995) and should include but not be limited to the following:

- a) Attendance at the pregrade conference by a qualified paleontologist or his/her representative;
- b) Monitoring of excavation activities by a qualified paleontological monitor in areas identified as likely to contain paleontological resources. The monitor shall be equipped to salvage fossils and/or matrix samples as they are unearthed in order to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment in the area of the find in order to allow removal of abundant or large specimens;
- c) Because the underlying sediments may contain abundant fossil remains that can only be recovered by a screening and picking matrix, these sediments shall occasionally be spot screened through one-eighth to one-twentieth-inch mesh screens to determine whether microfossils exist. If microfossils are encountered, additional sediment samples (up to 6,000 pounds) shall be collected and processed through one-twentieth-inch mesh screens to recover additional fossils;
- d) Preparation of recovered specimens to a point of identification and permanent preservation. This includes the washing and picking of mass samples to recover small invertebrate and vertebrate fossils and the removal of surplus sediment from around larger specimens to reduce the volume of storage for the repository and the storage cost for the developer;
- e) Identification and curation of specimens into a museum repository with permanent retrievable storage; and
- f) Preparation of a report of findings with an appended itemized inventory of specimens. When submitted to the City of West Hollywood, the report and inventory would signify completion of the program to mitigate impacts to paleontological resources.

4.4.8 CUMULATIVE IMPACTS

The proposed project has the potential to contribute to a cumulative adverse impact due to the loss of undiscovered cultural or paleontological resources when considered with the potential impacts of other projects in the City on cultural and scientific resources. Implementation of Mitigation Measures CULT-3 to CULT-5 would reduce the incremental contribution of the proposed project to this potential cumulative impact on paleontological and archaeological resources to below a level of significance.

The demolition of the building at 9080 Santa Monica Boulevard as part of the proposed project would contribute to a cumulative loss of historic resources in the City when past, current, and probable future projects are considered. Although Mitigation Measures CULT-1 and CULT-2 would reduce the impacts to this resource, impacts to the building at 9080 Santa Monica Boulevard would remain significant and unavoidable. Therefore, the proposed project's contribution to the loss of historic resources is cumulatively considerable.

4.4.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measures CULT-3 to CULT-5 would reduce the potential adverse impacts of the proposed project on paleontological and archaeological resources to below a level of significance.

The proposed project would result in a significant adverse impact due to the loss of an historic resource on the project site. Impacts to the building at 9080 Santa Monica Boulevard would remain significant and unavoidable even after implementation of Mitigation Measures CULT-1 and CULT-2. Other than avoiding this impact by not implementing the proposed project, no mitigation is possible to completely mitigate the adverse impacts of the proposed project on this resource to below a level of significance. Therefore, the proposed project impacts related to historic resources would remain significant and unavoidable after mitigation. In addition, this significant and unavoidable adverse impact would contribute to a cumulative adverse impact related to the loss of historic resources in the City.