

## 3.7 Cultural Resources

### 3.7.1 Introduction

The purpose of this section is to identify and evaluate the potential for the Expo Phase 2 project to affect and impact cultural resources, including archaeological and historical resources. The significance of a project's impacts to archaeological and historical architectural resources is generally determined by whether the project could cause a substantial adversely affect change to resources that are listed or are eligible for listing in the California Register of Historical Resources (California Register).

This section describes the ~~effects and impacts~~ under CEQA, that the proposed project may have on the cultural resources identified within two project Areas of Potential Effects (APEs): Figure 3.7-1 (Archaeological Areas of Potential Effect [Revised]) and Figure 3.7-2 (Architectural Areas of Potential Effect [Revised]). The APEs and survey methodologies were defined in consultation with the California State Historic Preservation Officer (SHPO) at the inception of this study, when it was believed that federal funding for the project would require adherence to the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA). It was later determined that the project would have no federal funding or involvement. Thus, SHPO consultation is no longer necessary. Notice of concurrence was received from SHPO on July 24, 2008, and is included in Appendix D of the ~~Historical Resource Evaluation Report (HRER).~~

Greater detail on Cultural Resources can be found in the *Archaeological Survey Report (ASR)*<sup>60</sup> and *Historical Resource Evaluation Report (HRER)*<sup>61</sup> prepared for this project. Additional information regarding additional project changes and design options is contained in an Addendum to the HRER.<sup>62</sup> Full bibliographic references can be found in Appendix B (Bibliography).

### 3.7.2 Existing Conditions

Information regarding the prehistoric, ethnographic, and historic conditions associated with the proposed project area and its surrounding vicinity is provided in the *Archaeological Survey Report* and *Historical Resources Evaluation Report*.

Native Americans are known to have been present in the Los Angeles area as early as 9,000 years B.P. By the second half of the eighteenth century, Spanish explorers began to establish missions across the region, and in 1822 the newly independent state of Mexico controlled this area. Spanish and Mexican rule influenced the decline of the Native American population in the area. In 1848, California was ceded to the United States, and the Gold Rush migration and

<sup>60</sup> *Archaeological Survey Report for the Exposition Corridor Transit Project Phase 2*, prepared by Candace Ehringer and Monica Strauss, EDAW, Inc. (2008).

<sup>61</sup> *Historical Resources Evaluation Report for the Exposition Corridor Transit Project Phase 2* prepared by M.K. Meiser, EDAW, Inc. (2008).

<sup>62</sup> *Addendum to the Historical Resources Evaluation Report for Project Changes and Design Options for the Exposition Corridor Transit Project Phase 2*, prepared by EDAW AECOM (2009).

tourism brought new settlers to the area. Improvements in transportation facilities in the second half of the nineteenth century were soon to transform the region.

Railroad and port construction significantly advanced development in the project region. In 1872, the Southern Pacific Railroad agreed to build their line through Los Angeles in a pivotal arrangement that gave Southern Pacific a monopoly on Los Angeles's port at San Pedro, securing Southern Pacific's dominance over rail lines into Los Angeles for the next decade. When the Southern Pacific Railroad extended its line from San Francisco to Los Angeles in 1876, newcomers poured into the area.

In the early 1870s, Colonel Robert S. Baker acquired vast tracts of Rancho San Vicente y Santa Monica, Rancho Boca de Santa Monica, and Rancho La Ballona. He envisioned a port city at Santa Monica linked by rail to Los Angeles. Baker joined with Senator John Percival Jones from Nevada, who established the Los Angeles & Independence Railroad (LA&IRR), the town of Santa Monica, and a 1,740-foot wharf to compete with the Southern Pacific Railroad's monopoly. Jones advertised Santa Monica for settlement, and in July 1875, he began auctioning parcels in the new township of Santa Monica creating rapid development of the area. In November 1875, the line was complete to Los Angeles. However, cutthroat competition with the Southern Pacific Railroad became fierce and Jones was forced to sell the fledgling LA&IRR in 1877 to Southern Pacific and his rival, Collis Huntington. Southern Pacific reduced traffic on the line and the Santa Monica's boomtown speculation halted.

Southern Pacific maintained its dominance in Los Angeles until the 1880s. Competition between railroad companies in the 1880s drove fares to an unprecedented low and population growth to an all-time high. With the affordable transportation, new settlers came in droves, and to accommodate them, over 60 new towns were laid out in the Los Angeles area between 1887 and 1889. With the indication that Southern Pacific would lose its monopoly over the expanding port at San Pedro, Huntington renewed the campaign for a deep-water port at Santa Monica. Ironically, the former LA&IRR, which was already owned by Southern Pacific and had been practically disabled to protect Southern Pacific's interests at the port in San Pedro, was now its chief interest. The rail line and the wharf at the new Port Los Angeles in Santa Monica were completed in 1893, and Southern Pacific transferred its operations from San Pedro to Port Los Angeles in Santa Monica. After years of controversy, San Pedro was determined to be the official site of the Los Angeles Port in 1897, having far-reaching effects of the development of the Los Angeles area.

In 1906, the Los Angeles Pacific Company, a trolley line (i.e., the Los Angeles Pacific Balloon Route) that took tourists over the wharf and the sea, leased the line from Port Los Angeles east to Sentous (1.2 miles east of Culver Junction, refer to Figure 3.7-3 [Map of the Los Angeles Pacific Balloon Route]) and electrified it in 1908 (part of this segment is within the current project area). The remainder of the line to Clement Junction in downtown Los Angeles was electrified in 1910 and 1911. By 1913, the Pacific Electric Railway Company assumed control of Los Angeles Pacific. Under control of both Los Angeles Pacific and Pacific Electric, the rail line from Los Angeles to Santa Monica was known as the "Santa Monica Air Line" because once outside the city limits of Los Angeles, it made a straight line to the beaches of Santa Monica.

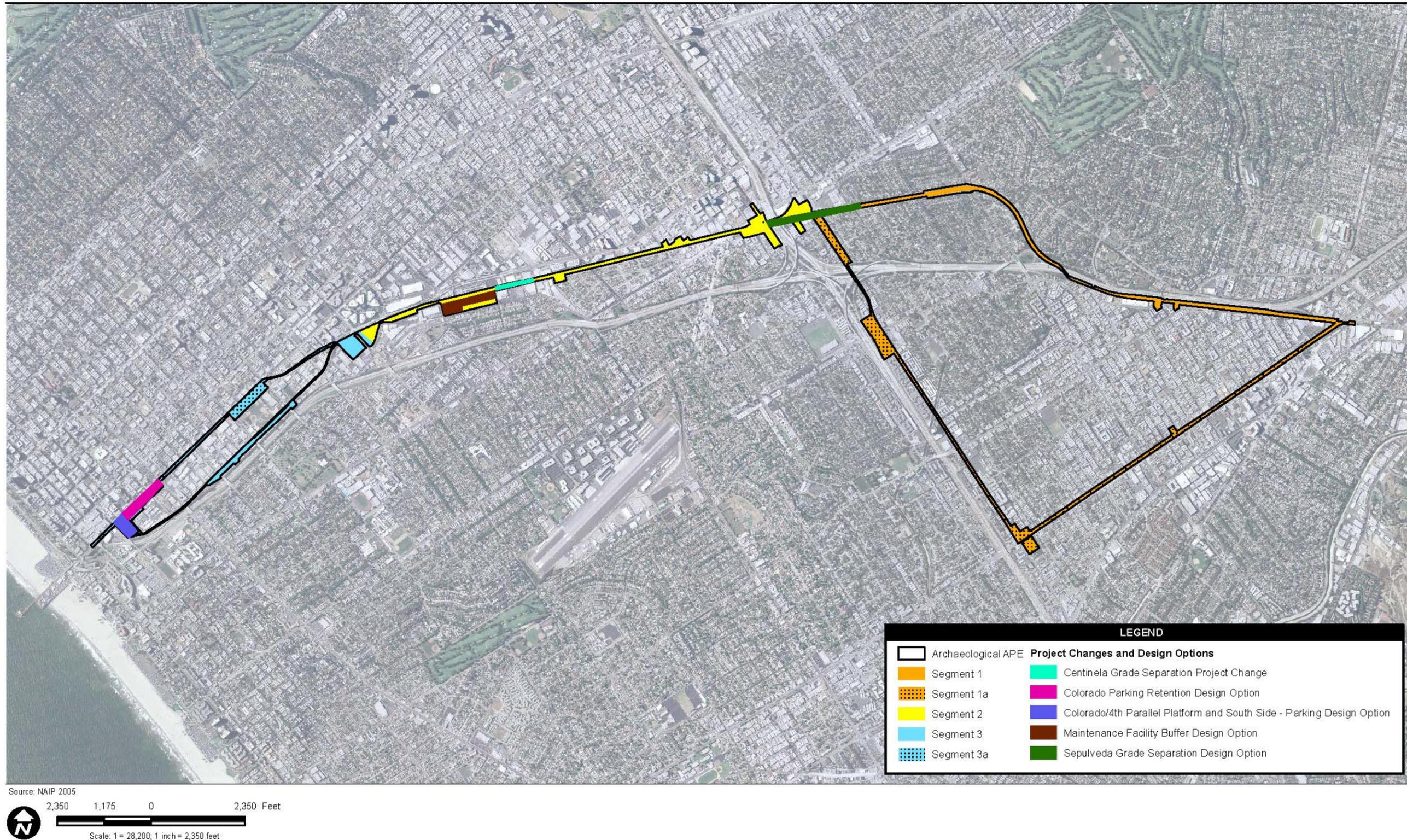


Figure 3.7-1 Archaeological Area of Potential Effect [Revised]



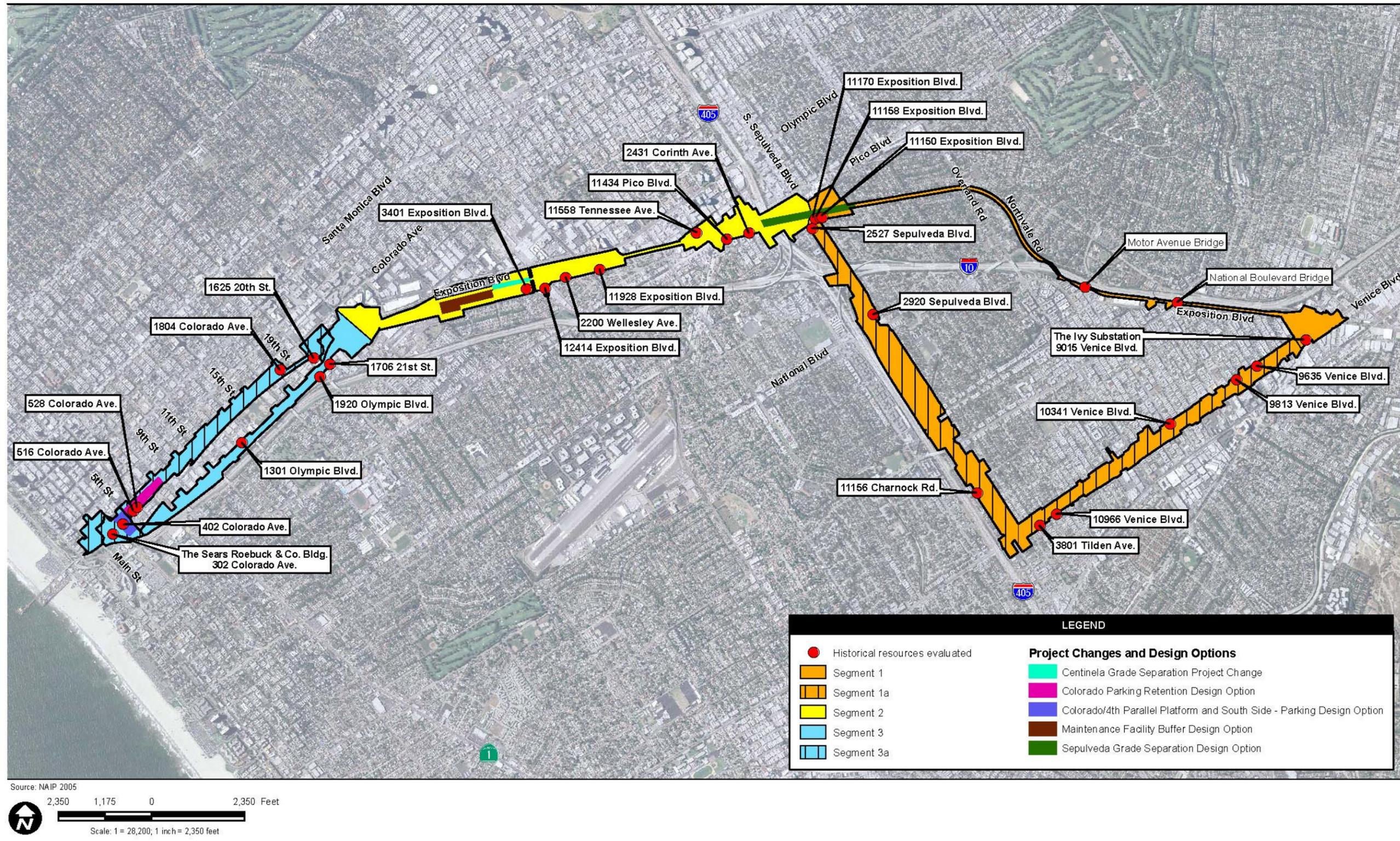
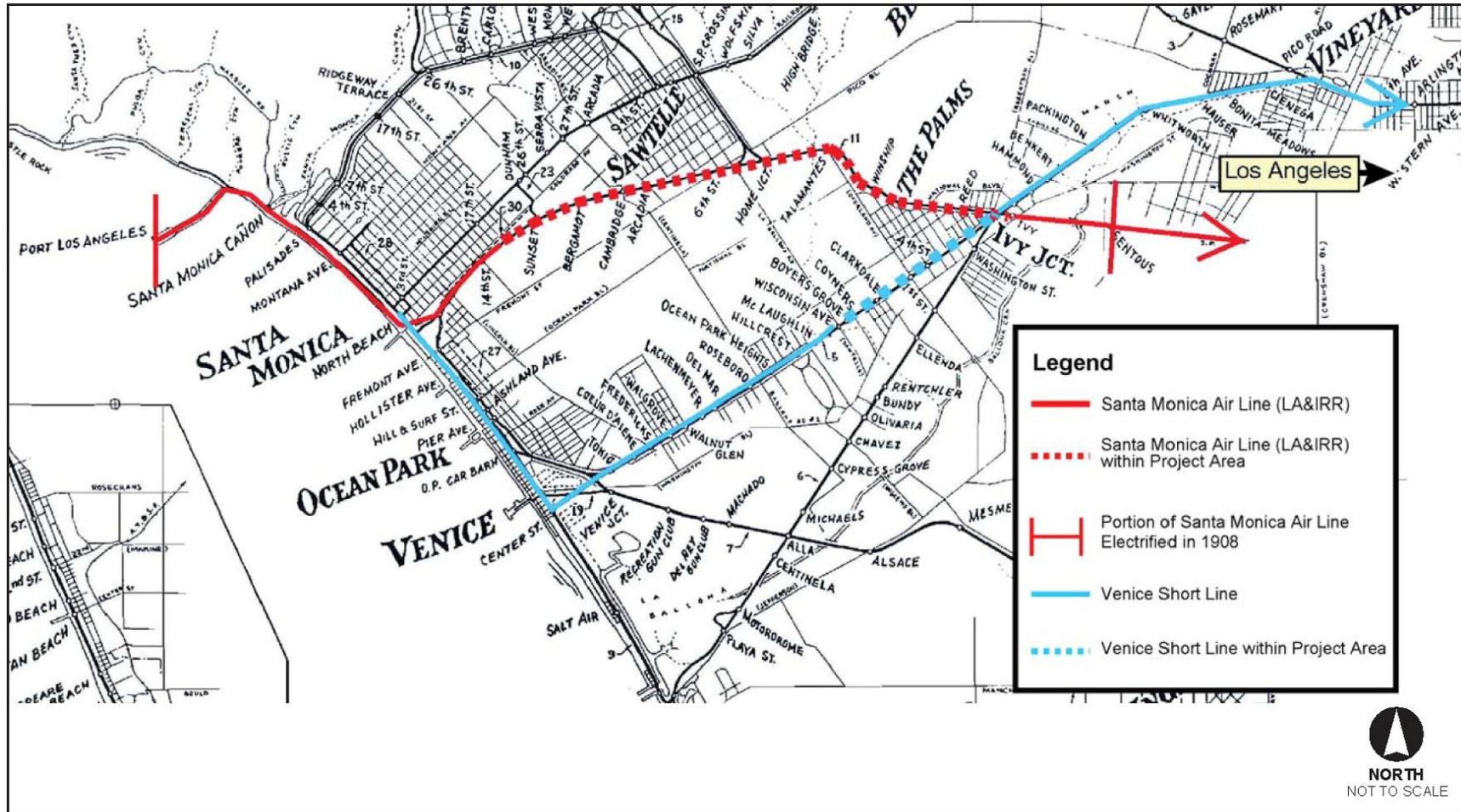


Figure 3.7-2 Architectural Area of Potential Effect [Revised]





Source: Ehringer and Strauss 2008.

Figure 3.7-3 Map of the Los Angeles Pacific Balloon Route

A second electric railway line, the Venice Short Line (also a part of the Los Angeles Pacific Balloon Route), connected Downtown Los Angeles with the beach communities of Venice and Santa Monica. Construction of the easternmost portion of the line, from downtown Los Angeles to Vineyard, was completed in 1897 by the Pasadena & Pacific Railway Company. Los Angeles Pacific gained control over the line by 1902 and completed the portion of the route from Vineyard to Ocean Park. The Venice Short Line ran along a private ROW in the median of Venice Boulevard (within Segment 1a [Venice/Sepulveda]).

The expansion of trolley lines increased the development of autonomous communities between Santa Monica and Los Angeles. The Los Angeles Pacific's Balloon Route Trolley sightseeing excursion brought more visitors into the area after 1902. East of Santa Monica, the communities of Sawtelle, Home Junction, and Palms, located on former lands of Rancho La Ballona, slowly developed from agricultural fields to residential and commercial centers.

Santa Monica continued to develop as a resort city with the help of the Santa Monica Air Line and other lines that serviced the popular beach areas. Hundreds of thousands of tourists had come by railway, and then by electric streetcars. Despite the presence of some light industries, including brick factories and a lumber-yard, banks, and a small business district, between 1875 and 1930, tourism was the dominant local industry. With the collapse of Jones's speculative LA&IRR, tourism suffered until the 1880s when the Southern California boom spurred by competitive railway fares brought newcomers to the beach. Into the 1890s, the south side beach, known as Ocean Park, developed as a quirky tourist attraction with an ostrich farm, a carnation farm, and attractions around the new pier that propelled the area to prominence as a place for tourists and day-trippers from Los Angeles.

Throughout the twentieth century, the City of Los Angeles expanded rapidly by absorbing land and communities around it to create the Westside as it is presently configured.

#### 3.7.3 Regulatory Setting

##### State

##### **California Environmental Quality Act (Public Resources Code Sections 21000–21177)**

CEQA is intended to prevent significant, avoidable impacts to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible. If cultural resources are identified as being within the proposed project area, the sponsoring agency must take those resources into consideration when evaluating project effects. The level of consideration may vary with the importance of the resource.

A cultural resource is considered "historically significant" under CEQA if the resource meets the criteria for listing in the California Register. The California Register was designed to be used by state and local agencies, private groups, and citizens to identify existing historical resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The section below describes the criteria for the California Register (*Public Resources Code* Section 5024.1, Title 14 CCR, Section 4852).

The California Register was created to identify resources deemed worthy of preservation on a state level. The criteria are nearly identical to those of the National Register but focus on resources of statewide, rather than national, significance. 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 (*Public Resources Code* Section 5024.1).

To be eligible for listing in the California Register, a property must be at least 50 years of age and 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
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, or method of construction or represents the work of a master, or possesses high artistic values
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

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A resource less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historic 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 (*Public Resources Code* Section 4852).

The CEQA Guidelines (Section 15064.5) also contain the following additional guidelines for defining a historical resource:

- California properties formally determined eligible for, or listed in the National Register (Section 5024.1.d.1)
- Those resources included in a local register of historical resources, as defined in Section 5020.1(k) of the *Public Resources Code*, or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the *Public Resources Code*
- Those resources that a lead agency determines to be historically significant provided the determination is based on substantial evidence

Additional clarification of the implementation of these sections of the Public Resources Code are provided in Title 14 of the California Code of Regulation, Chapter 3, Guidelines for the Implementation of the *California Environmental Quality Act*, Article 5, Section 15064.5.

#### **Public Resources Code Section 5097.5**

The law provides that no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such

lands. Violation of this section is a misdemeanor. As used in this section, "public lands" means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

**California Health and Safety Code (Public Resources Code Section 7050.5)**

The disposition of Native American burials is governed by this section of the California *Health and Safety Code*.

**California Health and Safety Code (Public Resources Code Section 7052)**

Section 7052 of the *Health and Safety Code* establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by designated individuals.

**Local**

**Culver City Historic Preservation Program**

Culver City's Historic Preservation Program was established by city ordinance in 1991 and subsequently codified as Chapter 15.05 of the *Culver City Municipal Code*. Chapter 15.05 lays out specific guidelines for the designation, nomination, and preservation of cultural resources within the city on the basis of their architectural, historical, and/or cultural importance.

**City of Los Angeles General Plan Conservation Element**

City of Los Angeles guidelines for the protection of archeological resources are set forth in Section 3 of the City of Los Angeles General Plan Conservation Element, which, in addition to compliance with CEQA, requires the identification and protection of archaeological sites and artifacts as a part of local development permit processing.

Specifically, *Los Angeles Municipal Code* (LAMC) Section 91.106.4.5 states that the Building Department "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated" by a federal, state, or local authority.

**City of Los Angeles Historic-Cultural Monument Designation**

In Los Angeles, resources may be designated as Historic-Cultural Monuments under Sections 22.120, et seq., of the LAMC.

**City of Santa Monica Landmarks and Historic Districts Ordinance**

The Santa Monica Landmarks and Historic Districts Ordinance established a Landmarks Commission with the power to designate City Landmarks and Structures of Merit, and to make recommendations to the City Council regarding the designation of potential Historic Districts.

**3.7.4 Analytic Methodology**

Impacts to historic resources could include direct impacts to the buildings themselves, or the parcels upon which they are located. Impacts could also include major changes in the settings of the resources, caused by the introduction of new visual elements related to the project. In

addition, indirect impacts could include substantial increases in noise and vibration, which could affect historic resources.

**Archaeological Survey**

An archaeological survey was conducted with the goal of identifying archaeological resources within the APE. The assessment included archival records research at the South Central Coastal Information Center (SCCIC), an archaeological field survey, and a Native American Contact Program. The archaeological field survey consisted of a walkover of the entire corridor and a surface examination of areas of archaeological potential.

A Native American contact program was conducted to inform interested parties of the proposed project and to address any concerns regarding Traditional Cultural Properties or other resources important to Native Americans that could potentially be affected by the project. The program involved contacting Native American representatives provided by the Native American Heritage Commission (NAHC) to solicit comments and concerns regarding the project. Documents pertaining to the Native American contact program are attached as Appendix B of the ASR.

A letter was prepared and mailed to the NAHC on April 4, 2007. The letter requested that a Sacred Lands File (SLF) review be conducted for the project and that contact information be provided for Native American groups or individuals that may have concerns about cultural resources in the project area. The NAHC responded to the request in a letter dated April 13, 2007. The letter indicated that “The SLF did indicate the presence of Native American cultural resources in the immediate project area. This study area is in close proximity to previously discovered prehistoric burial sites and is believed to hold numerous cultural resources.” The letter also included a mailing list of Native American contacts who wish to be contacted when the NAHC is consulted about potential projects in the area.

Letters were mailed on April 17, 2007, to each group or individual provided on the contact list. Maps depicting the project area and response forms were attached to each letter. Follow-up phone calls were made to each party on June 1, 2007.

As a result of the Native American contact program, three responses (one letter and two phone calls) were received from representatives identified with the Gabrieliño/Tongva Tribe. Each interested party expressed their concerns about the project’s anticipated effects on Native American cultural sites. Specific concerns include that project construction be monitored, that areas along Olympic Boulevard and Main Street in Santa Monica are known by Native Americans to be culturally sensitive, and that the parties be informed during future project phases. No specific information pertaining to sacred lands or any other known sites was obtained from the interested parties. The areas along Olympic Boulevard and Main Street known to be sacred are not with-in the construction zone as they are on the south side of the I-10 Freeway.

**Architectural Survey**

An architectural survey was conducted to identify and evaluate historical resources within the APE. An archival records search at the SCCIC was conducted and local landmarks listings were reviewed to identify previously recorded historical resources within a 0.5-mile radius of the project.

The approach to the architectural survey of the approximately 7-mile-long APE was determined in consultation with the SHPO. However, the APE has been expanded to encompass changes to the project and design options that have been added to the FEIR. The survey method involved initially locating individual resources within the limit of reaching 50 years old or older by the completion of the project, which was determined to include all resources built before 1965. Building Assessor's records were reviewed, and over 700 results indicated built dates of 1965 or earlier. A reconnaissance survey resulted in the identification of 2627 resources (2425 buildings and 2 bridges) built between 1897 and 1964 that possessed characteristics requiring further evaluation (Table 3.7-1 [List of Buildings/Structures Evaluated]). These 2627 resources were recorded and evaluated.

**Table 3.7-1 List of Buildings/Structures Evaluated**

Address	Year Built	Architectural Style	California Register Eligibility <sup>a</sup>
<b>Segment 1: Expo ROW (LRT Alternatives 1 and 2)</b>			
Motor Ave. Bridge	1962	Railroad Bridge	No
National Blvd. Bridge	1964	Railroad Bridge	No
<del>Ivy Substation, 9015 Venice Blvd.</del>	<del>1907</del>	<del>Spanish Eclectic</del>	<del>California Register Listed</del>
<b>Segment 1a: Venice/Sepulveda (LRT Alternatives 3 and 4)</b>			
Ivy Substation, 9015 Venice Blvd.	1907	<del>Spanish Eclectic</del> <u>Mission Revival</u>	<u>Listed in California Register Listed</u>
10966 Venice Blvd.	1927	Spanish Eclectic	No
11156 Charnock Rd.	1952	Modern/Minimal Traditional	No
2920 S. Sepulveda Blvd.	1961	American International	Potentially Eligible
2527–2531 S. Sepulveda Blvd.	1938	Modernistic/Art Moderne	No
9813 Venice Blvd.	1915	Neoclassical	Potentially Eligible
9635 Venice Blvd.	1928	Italian Renaissance	Potentially Eligible
10341 Venice Blvd.	1923	Italian Renaissance	Potentially Eligible
3801–3803 Tilden Ave. 11030–11032 Venice Blvd. 11034–11036 Venice Blvd.	1940	Minimal Traditional	No
<b>Segment 2: Sepulveda to Cloverfield (All LRT Alternatives)</b>			
<u>3401 Exposition Blvd.*</u>	<u>1961</u>	<u>Spanish Eclectic/Modern</u>	<u>No</u>
12414 Exposition Blvd.	1927	Spanish Eclectic	No
2200 Wellesley Ave.	1935	Craftsman	No
11928 Exposition Blvd.	1939	Minimal Traditional	No
11558 Tennessee Ave.	1949	Industrial Warehouse	No
11434 Pico Blvd.	1962	Eclectic	No

**Table 3.7-1 List of Buildings/Structures Evaluated**

Address	Year Built	Architectural Style	California Register Eligibility <sup>a</sup>
2431–2435 Corinth Ave.	1938	Modernistic/Art Moderne	No
<b>Segment 3: Olympic (LRT Alternatives 1 and 3)</b>			
1301 Olympic Blvd.	1925	Modernistic/Art Deco	No
1920 Olympic Blvd.	1940	American International	No
1706 21 <sup>st</sup> St.	1914	Craftsman	No
Sears Roebuck and Company 302 Colorado Ave.	1947	<u>Late</u> Art Moderne	Eligible
Sears Automotive Store 402 Colorado Ave.	1947	Art Moderne	No
<b>Segment 3a: Colorado (LRT Alternatives 2 and 4)</b>			
516 Colorado Ave.	1897	Queen Anne/Spindlework	Potentially Eligible
528 Colorado Ave.	1910	Craftsman	No
1804 Colorado Ave.	1947	Late Craftsman	No
1625 20 <sup>th</sup> St.	1928	Spanish Eclectic	No
Sears Roebuck and Company 302 Colorado Ave.	1947	<u>Late</u> Art Moderne	Eligible
Sears Automotive Store 402 Colorado Ave.	1947	Art Moderne	No

SOURCE: EDAW, 2008.

a. Resources have been recommended eligible for the California Register, but concurrence from the CA SHPO is pending; to be listed, resources must be nominated.

\* This resource was identified related to project changes to include the Centinela grade separation.

Table 3.7-2 (Summary of Buildings/Structures by LRT Alternative) identifies the number of buildings/structures that are registered, listed in, eligible, potentially eligible, or and not eligible for the California Register. LRT Alternative 4 (Venice/Sepulveda–Colorado) would have the greatest number of buildings and structures, with seven sites either eligible or potentially eligible. One site is already listed on in the California Register. Most of these buildings and structures would be found along Segment 1a (Venice/Sepulveda).

**Table 3.7-2 Summary of Buildings/Structures by LRT Alternative**

LRT Alternative	Number of Buildings/Structures <sup>a</sup>	
	Not Potentially Eligible	Registered, Eligible, or Potentially Eligible
LRT Alternative 1: Expo ROW–Olympic	4213	21
LRT Alternative 2: Expo ROW–Colorado	4213	32
LRT Alternative 3: Venice/Sepulveda–Olympic	4415	6
LRT Alternative 4: Venice/Sepulveda–Colorado	4415	7

SOURCE: EDAW, 2008; updated 2009.

a. Resources have been recommended eligible for the California Register, but concurrence from the CA SHPO is pending; to be listed, resources must be nominated and approved by CA SHPO.

**FEIR Design Options**

As noted in Table 3.7-3 (Segment 1: Expo ROW [Sepulveda Grade Separation Design Option]), the architectural survey resulted in the identification of three resources associated with the Sepulveda Grade Separation Design Option that possessed characteristics requiring further evaluation. These three resources were determined to be not eligible for the California Register. None of the other design options resulted in additional buildings/structures or potentially eligible resources.

**Table 3.7-3 Segment 1: Expo ROW (Sepulveda Grade Separation Design Option)**

<u>Address</u>	<u>Year Built</u>	<u>Architectural Style</u>	<u>California Register Eligibility<sup>a</sup></u>
<u>11150 Exposition Blvd.</u>	<u>1940</u>	<u>Minimal Traditional</u>	<u>No</u>
<u>11158 Exposition Blvd.</u>	<u>1938</u>	<u>Minimal Traditional</u>	<u>No</u>
<u>11170 Exposition Blvd</u>	<u>1937</u>	<u>Spanish Eclectic</u>	<u>No</u>

SOURCE: EDAW, 2009.

a. Resources have been recommended eligible for the California Register; to be listed, resources must be nominated and approved by CA SHPO.

**Description of Cultural Resources**

**Archaeological Resources**

The project is located in a coastal and semi-coastal environment between the Pacific Ocean and Ballona Creek, an area inhabited prehistorically by the Gabrieliño Indians. The project area consists largely of a historic railroad ROW (documented as an archaeological resource, see below) that has been subject to virtually no ground disturbance. Other portions of the project area travel along city streets where the level of soil disturbance below pavement remains unknown. For example, it has not been determined whether rail elements associated with the Venice Short Line exist below present-day Venice Boulevard. Although no specific site locations have been identified, the NAHC Sacred Lands File check and contact with Native American

representatives indicate that the project area is known for sacred Native American and archaeological sites. Furthermore, historic development began in the project area over 125 years ago when the common method of rubbish disposal was to bury it. For these reasons, it is possible that buried or otherwise obscured archaeological resources may be present within the APE and may be discovered during ground-disturbing activities associated with the project.

#### Santa Monica Air Line

As a result of the archaeological survey, the Santa Monica Air Line was identified as a historic archaeological resource within the APE. The resource consists of a segment of rail and 14 railroad-related elements. This resource was the first railroad line (the LA&IRR) constructed from Los Angeles to Santa Monica. The line, completed in 1875, began in Santa Monica at the pier located at the end of Colorado Avenue and traveled west to downtown Los Angeles and traveled through what would become the communities of Sawtelle, Palms, Culver City, and West Los Angeles. In 1908, Los Angeles Pacific leased this line and began to electrify it. Under Los Angeles Pacific, the line became known as the Santa Monica Air Line. This line was completely consolidated within the Pacific Electric system in 1914<sup>3</sup>. Passenger service was terminated by Pacific Electric in 1953. In 1965, Pacific Electric merged with Southern Pacific, who continued to run diesel freight trains along the line until the mid-1980s. The Los Angeles County Metropolitan Transportation Authority (Metro) purchased the ROW in 1993<sup>1</sup>.

The Santa Monica Air Line was found eligible under Criterion 1 of the California Register (association with significant events) for its significant role in the creation and development of the City of Santa Monica, and as an important commuter rail system that served to sustain a critical connection between downtown Los Angeles and Santa Monica. The period of significance for this resource is 1875 to 1930. The Santa Monica Air Line retains integrity of location, design, setting, feeling, and association. Although the extant railroad-related elements are in disuse or disrepair, all but two of the rail elements continue to convey their original associations. The two exceptions to this are the railroad bridges: the Motor Avenue and National Boulevard bridges. Each bridge was evaluated in two contexts. First, each bridge was evaluated for its contribution to the significance of the Santa Monica Air Line. Although the bridges are historic in age (1962 and 1964, respectively), they are replacements of the original bridges in these locations that dated from the Santa Monica Air Line's period of significance. The bridges only contribute to the resource in that they continue to convey the setting, feeling, and associations of the railroad segment as it was originally intended. Second, the bridges were evaluated by a qualified architectural historian for their potential significance as individual structures. Neither of the bridges was found eligible for the California Register.

The project area encompasses portions of two historic railroad lines: the Santa Monica Air Line (formerly LA&IRR) and the Venice Short Line (refer to Figure 3.7-3 [Map of the Los Angeles Pacific Balloon Route]). A portion of the Santa Monica Air Line falls within Segment 1 (Expo ROW), Segment 2 (Sepulveda to Cloverfield), and the eastern portion of Segment 3 (Olympic) and Segment 3a (Colorado) of the project area. A portion of the Venice Short Line (no longer visible) was once located in the Venice Boulevard portion of Segment 1a (Venice/Sepulveda).

#### **Architectural Resources**

Twenty-six ~~seven~~ architectural resources (listed in Table 3.7-1 [List of Buildings/Structures Evaluated]) were documented and evaluated for eligibility for the California Register. Of the 26 ~~twenty-seven~~ architectural resources surveyed, five newly identified buildings were found to be

potentially eligible under various California Register criteria. One building, the Ivy Park Substation, was previously documented and is listed on the National Register and the California Register. One building, the Sears Roebuck and Company Building, had previously been determined eligible. Further information about the seven significant or potentially significant architectural resources is presented below.

The Ivy Substation, 9015 Venice Blvd.

The Ivy Substation, in Segment 1a, was built in 1907 to provide power for the Pacific Electric Railway. As its significance under California Register Criteria 1 and 3, indicate, the building is notable not only for its representation of a significant period of Los Angeles history and transportation trends, but for its uncommon architectural style. The building was designed in the Mission Revival-style, which was uncommon for generator facilities. Additionally, many industrial buildings of the same style had been lost or altered, and the Ivy Substation is especially intact. It is listed on the National Register and California Register.

Residential Building, 9813 Venice Blvd.

Set back from Venice Boulevard in Segment 1a, the multi-unit two-story Neoclassical apartment building was built in 1915. This apartment building is a rare example of the Neoclassical style, popular between 1895 and 1950. It exhibits many characteristics of the style, including the full-height Corinthian columns, the roofline balustrade, and the elaborate cornice. Significant elements of this building are intact and it meets the criterion of embodying the distinctive characteristics of the Neoclassical style. It is potentially eligible for the California Register under Criterion 3.

Culver City Masonic Lodge No. 467, 9635 Venice Blvd.

Located in Segment 1a, the Culver City Masonic Lodge was built in 1928. This building is potentially eligible for the California Register under Criteria C and 3. The association with the Masons is significant because of the importance of the social organization in Culver City's early history. Social organizations were an important component of the development of the local community. The architectural characteristics of the building are significant in that they embody a rare high-style example of the Italian Renaissance style that was popular from the 1890s to about 1935. This building is a good example of the flat-roofed subtype of the Italian Renaissance style, including a prominent roof-line balustrade, paired arched windows, and elaborately rusticated quoining.

Citizens State Bank, 10341 Venice Blvd.

Located in Segment 1a, this building was built in 1923 as the Citizens State Bank. This building is a rare example of a one-story commercial building with Italian Renaissance features. The colonnaded loggia with four Ionic columns, elaborate rusticated quoins, and arched windows are all distinctive characteristics of the style. The flat roof with parapet and partial balustrade is another defining feature. The exterior of the building appears intact and retains its integrity. It is potentially eligible for the California Register under Criterion 3, as a rare example of the Italian Renaissance style.

Westdale Savings and Loan, 2920 S. Sepulveda Blvd.

Located in Segment 1a, this three-story building built in 1961 for the Westdale Savings and Loan Company demonstrates modern elements of the International style. This building is designed in the late American International style that was originally developed in Europe as the International style in the 1920s and translated into American architecture in the 1930s. Characterized by emphasis on structural members and functionality, later American International design evolved using a larger variety of materials. This building is a rare example of the style along this corridor, using brick walls and flush windows at the exterior. The building retains its integrity and is potentially eligible for the California Register under Criterion 3.

Queen Anne House, 516 Colorado Ave.

Built in 1897, this two-and-a-half-story building is a unique example of a Queen Anne house along this corridor located in Segment 3a. This building is a rare example of a Queen Anne-style Victorian house with Spindework details. It has the characteristic asymmetrical form, irregularly shaped roof, turret, full-width wraparound porch, upper balcony, and elaborated Queen Anne decorative details. The Spindework subset of the Queen Anne style is the most commonly occurring type, popular from 1880 until 1910, but this is a rare example along this corridor. The exterior of this house is a distinct example of the architectural style. It is not associated with a significant event or person in Santa Monica's history, but it meets California Register Criterion 3 for its embodiment of the Queen Anne style and is therefore potentially eligible for listing.

The Sears Roebuck and Company Building, 302 Colorado Ave.

The Sears Roebuck and Company Building, located in Segment 3 and Segment 3a, was built in 1946–1947 to house the prominent department store in a central location in downtown Santa Monica. The Sears Roebuck and Company Building was designated as a local landmark for the City of Santa Monica in 2005, having met more than one necessary criterion. It was found to be significant based on its cultural contribution to the City of Santa Monica and its role in the development of a central business district in the city. Within a national context, the Sears Roebuck and Company Building marked an era of changing manufacturing and distribution of retail practices, transitions of transportation preferences, and new consumer behaviors of American families. The iconic building is also visible from key vantage points within Santa Monica and exhibits exemplary qualities of the Late Art Moderne style of architecture. Significance was also based on the role of the Janss Corporation (developer) and Crawford (architect), two notable Los Angeles figures. It was previously determined to be eligible for the California Register under Criteria 1 and 3.

**3.7.5 Criteria, Impact Evaluation, and Mitigation Measures**

<b>Criterion</b> <b>Would the project result in significant impacts under CEQA to previously unidentified archaeological resources?</b>
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**No-Build Alternative**

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the

Expo Phase 2 ROW would be the I-405 Widening project. There would be on-street bus service improvements that would not result in ground disturbance, nor would the No-Build Alternative result in disturbance of the Expo Phase 2 ROW. Mitigation measures have been included in the I-405 Widening project to address unidentified archaeological resources. The No-Build Alternative would have **no impact** on archaeological resources.

**Transportation Systems Management (TSM) Alternative**

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops along existing streets and additional buses. As there would be no ground-disturbing activities in previously undisturbed areas associated with the TSM Alternative, there would be no effect to unidentified archaeological resources. The TSM Alternative would have **no impact** on archaeological resources.

**LRT Alternatives**

Work proposed in connection with the LRT Alternatives involves ground-disturbing activities that may potentially have a significant impact on unidentified archaeological resources, affect unidentified archaeological resources. The Expo Authority will submit its proposed determination of effect to the SHPO and seek concurrence. If it is determined that the effects are adverse, a Memorandum of Agreement (MOA) to define how effects will be addressed would be needed under provisions of the CRHR.

Consistent with CEQA Guidelines, the Expo Authority will address impacts with the following mitigation:

MM CUL-1 Per CEQA Guidelines Section 21803.2(i), "a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place."

This project involves ground-disturbing activities throughout the area defined as the archaeological APE. Prior to the commencement of construction activities, a Cultural Resources Treatment Plan, including a Discovery Plan, shall be prepared describing a site-specific archaeological monitoring program for high potential areas and treatment methods that will be implemented in the event archaeological resources are discovered during construction.

Because buried or otherwise obscured archaeological resources may be encountered, an archaeological monitoring program shall be implemented in accordance with the project's MOA.

Treatment Plan. Archaeological monitoring of ground-disturbing activities shall be limited to those portions of the Expo ROW that are presently obscured by pavement and/or buildings, and on Venice Boulevard where there exists at the possibility of encountering archaeological remnants associated with the Venice Short Line, unless it can be ascertained that previous ground disturbance has eliminated the potential to yield archaeological resources. Monitoring shall be conducted by a qualified archaeological monitor who is working under the direct supervision of a Project Manager or Principal Investigator certified by the Register of Professional Archaeologists (RPA) (qualifications derived from 36 CFR Part 61). Ground-disturbing activities include, but are not limited to, pavement/asphalt removal, boring, trenching, grading, excavating, and the demolition of building foundations. The archaeological monitor will observe ~~representative~~ ground-disturbing activities in these locations to a depth of 3 feet. A preconstruction information and safety meeting ~~shall~~ be held to make construction personnel aware of archaeological monitoring procedures and the types of archaeological resources that might be encountered.

In the event that archaeological resources are encountered during archaeological monitoring, the monitor may halt work in the immediate vicinity until the discovery is assessed by the project archaeologist and appropriate treatment is determined. Additional monitoring recommendations may be made at that time. If archaeological resources are encountered by construction personnel in portions of the project area where a monitor is not present, work in the immediate vicinity shall be suspended until the project archaeologist investigates the discovery and determines appropriate treatment.

In the event that human remains are discovered, work in the immediate vicinity of the discovery will be suspended and additional measures will be implemented as required by state law.

~~Prior to the commencement of construction activities, a Cultural Resources Discovery Plan shall be prepared describing treatment methods that will be implemented in the event archaeological resources are discovered during construction. The Discovery Plan may be part of the Historic Properties Treatment Plan (HPTP).~~

Upon completion of all ground-disturbing activities associated with this project, an Archaeological Resources Monitoring Report shall be prepared documenting construction activities observed, including copies of all daily archaeological monitoring logs. If discoveries are made during ground-disturbing activities, the report will also document the associated cultural materials and the methods of treatment as determined appropriate by the archaeologist.

With the implementation of the mitigation measure listed above, impacts would be reduced to a level of **less than significant**.

**FEIR Design Options**

The Expo/Westwood Station No Parking, Sepulveda Grade Separation, Maintenance Facility Buffer, Colorado Parking Retention, and Colorado/4<sup>th</sup> Parallel Platform and South Side Parking design options would involve ground-disturbing activities that may potentially have a significant impact on unidentified archaeological resources. The Expo Authority will address impacts following CEQA Guidelines with MM CUL-1. With the implementation of the mitigation measure listed above, impacts would remain **less than significant**.

**Criterion** Would the project result in the physical destruction, damage, or alteration of all or part of California Register-eligible archaeological resources, thus creating significant impacts under CEQA?

**No-Build Alternative**

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. Within the Expo Phase 2 ROW, no physical destruction, damage, or alteration of a California Register-eligible archaeological resource has been identified. There would also be on street bus service improvements that would not result in ground disturbance. The No-Build Alternative would have **no impact**.

**Transportation Systems Management (TSM) Alternative**

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase\_2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses. As there would be no ground-disturbing activities in previously undisturbed areas associated with the TSM Alternative, there would be no physical destruction, damage, or alteration of a California Register-eligible archaeological resource. The TSM Alternative would have **no impact** on archaeological resources.

**LRT Alternatives**

Grading, placement of fill, widening of the Expo ROW, installation of aerial structures and retaining walls, removal of existing track and railroad-related elements would affect impact the proposed California Register-eligible archaeological resource identified as the Santa Monica Air Line. ~~The Expo Authority will submit its proposed determination of effect to the SHPO and seek concurrence. If it is determined that the effects are adverse, a MOA to define how effects will be addressed would be need under provisions of CRHR.~~

Consistent with CEQA Guidelines, the Expo Authority will address this impact with the following mitigation:

MM CUL-2 Per CEQA Guidelines Section 21083.2(c), mitigation measures shall be required if unique archaeological resources are not preserved in place or not left in an undisturbed state. When this is not feasible, Section 15126.4(b)(3)(C) warrants a data recovery plan, "which makes provisions for adequately recovering scientifically consequential information from and about the historical resource," and "shall be prepared and adopted prior to any

excavation being undertaken.” The Expo Authority shall prepare such a plan to identify measures to reduce the project’s impacts to the Santa Monica Air Line a California Register–eligible resource.

~~If it is determined from the SHPO consultation process that there will be adverse effects to California Register–eligible resources, including the Santa Monica Air Line segment, an MOA shall be prepared in consultation with the SHPO. MOA would define the actions of the in implementing the project. The Expo Authority shall prepare a HPTP to identify measures to reduce the project’s adverse effects to significant cultural resources, including the Santa Monica Air Line segment. The HPTP will be submitted to the SHPO as part of the MOA consultation and may be appended to the MOA for reference~~

With the implementation of the mitigation measure listed above, impacts would be reduced to a level of **less than significant**.

### **FEIR Design Options**

The Expo/Westwood Station No Parking, Sepulveda Grade Separation, Maintenance Facility Buffer, Colorado Parking Retention, and Colorado/4<sup>th</sup> Parallel Platform and South Side Parking design options would involve grading, placement of fill, widening of the Expo ROW, installation of aerial structures and retaining walls, and the removal of existing track and railroad-related elements which would impact the proposed California Register-eligible archaeological resource identified as the Santa Monica Air Line. The Expo Authority will address impacts following CEQA Guidelines with MM CUL-2. With the implementation of the mitigation measure listed above, impacts would remain **less than significant**.

<b>Criterion</b> <b>Would the project result in the physical destruction, damage, or alteration of all or part of California Register–eligible historic <u>properties</u><u>architectural resources</u>, thus creating significant impacts under CEQA?</b>
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### **No-Build Alternative**

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. The I-405 Widening project has identified no historic ~~properties~~architectural resources near the Expo Phase 2 ROW. There would be on street bus service improvements that would not result in physical disturbance of California Register-eligible historic ~~properties~~architectural resources. The No-Build Alternative would have **no impact** with regards to historic ~~properties~~architectural resources.

### **Transportation Systems Management (TSM) Alternative**

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase\_2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses. There would be no acquisition of historic architectural resources or visual intrusions into the settings of historic architectural resources associated with increased bus service on existing streets or upgraded bus stops. The TSM Alternative would have **no impact** on historic ~~properties~~architectural resources.

**LRT Alternatives**

In Segment 1a (LRT Alternatives 3 and 4), reconfiguration of the sidewalk at the corner of Venice Boulevard and Motor Avenue could require modification to the Citizens State Bank building at 10341 Venice Boulevard. The conceptual engineering design using a standard curb return and access ramp design will move the sidewalk within the building perimeter. However, two scenarios exist to avoid this effect:<sup>63</sup>

1. Selection of LRT Alternatives 1 and 2 would avoid this property all together.
2. Application Request for variance would be made to the City of Los Angeles to install a custom curb return and ramp that would avoid the building.

The Expo Authority will submit its proposed determination address this impact consistent with CEQA Guidelines with the following mitigation:

**MM CUL-3**

*If it is determined from the SHPO consultation process that there will be adverse effects to California Register-eligible resources, including the Citizens State Bank at 10341 Venice Boulevard, an MOA shall be prepared in consultation with the SHPO. The MOA would define the actions of the Expo Authority in implementing the project. The Expo Authority shall prepare a HPTP to identify measures to reduce the project's adverse effects to significant cultural resources. The HPTP will be submitted to the SHPO as part of the MOA consultation and may be appended to the MOA for reference. Per CEQA Guidelines Section 15126.4(b)(1), where actions on a historical resource will be "conducted in a manner consistent with the Secretary of effect to the SHPO the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and seek concurrence. If it is determined that this effect is Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance."*

*Substantial adverse, a MOA to define how effects will be addressed would be needed under provisions of the CRHR change to the California Register-eligible resource the Citizens State Bank at 10341 Venice Boulevard including physical destruction, damage, or alteration will be avoided through a variance request to the City of Los Angeles. If that the variance is not granted and a substantial adverse change is unavoidable, mitigation shall include archival documentation to the level of Historic American Buildings Survey (HABS) standards through archival photography of the resource, to be submitted to local archives, although not requiring submittal to the Library of Congress. Although CEQA Guidelines 15126.4(b)(2) states: "In some circumstances, documentation of an historical resource... as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur," the additional measures of material salvage and the preparation of interpretative*

<sup>63</sup> CEQA Section 15064.5(b)(4), Determining the Significance of Impacts to Archeological and Historical Structures Resources, requires the lead agency to identify potentially feasible measures to mitigate significant effects adverse changes to historical structures-resources.

historical information about the historic architectural resource for public dissemination will collectively be considered adequate mitigation.

With the implementation of the mitigation measure above, impacts may be reduced to a level **less than significant**.

### **FEIR Design Options**

The Expo/Westwood Station No Parking, Sepulveda Grade Separation, Maintenance Facility Buffer, Colorado Parking Retention, and Colorado/4<sup>th</sup> Parallel Platform and South Side Parking design options would include physical modifications that would not directly impact any California Register-eligible historic architectural resources. The design options would have **no impact** on historic architectural resources.

<b>Criterion</b>	<b>Would the project result in the introduction of visual, audible, or atmospheric elements that are out of character with California Register-eligible historical resources or alter their setting, thus creating significant impacts under CEQA?</b>
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### **No-Build Alternative**

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. The I-405 Widening project has identified no historic ~~properties~~ resources near the Expo Phase 2 ROW. There would be on street bus service improvements that would not result in the introduction of visual, audible, or atmospheric elements that are out of character with California Register-eligible historic ~~properties~~ resources. The No-Build Alternative would have **no impact** with regards to historic ~~properties~~ resources.

### **Transportation Systems Management (TSM) Alternative**

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses. There would be on-street bus service improvements that would not result in the introduction of visual, audible, or atmospheric elements that are out of character with California Register-eligible historic ~~properties~~ resources. The TSM Alternative would have **no impact** with regards to historic ~~properties~~ resources.

### **LRT Alternatives**

Due to the numerous alterations of the settings throughout the study area, no indirect impacts to known historical resources would result from the proposed at-grade project facilities. The aerial elements in ~~Segment 1 and Segment 1a (Venice/Sepulveda)~~ at and on Venice Boulevard ~~would create a visual intrusion on the setting of the Ivy Substation, a historic resource listed in the California Register and the National Register Ivy Substation.~~ The Expo Authority will address this impact consistent with CEQA Guidelines with the following mitigation: submit its proposed determination of effect to the SHPO and seek concurrence. If it is determined that the

effects are adverse, a MOA to define how effects will be addressed would be needed under provisions of the CRHR.

MM CUL-4 *If it is determined from the SHPO consultation process that there ~~Per CEQA Guidelines Section 15126.4(b)(1), where actions on a historical resource will be adverse effects to~~ “conducted in a manner consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project’s impact on the historical resource shall generally be considered mitigated below a level of significance.”*

*Visual intrusion due to the construction of an aerial structure in Segment 1a on the National and California Register-eligible resources, including the Registered Ivy Substation located at 9015 Venice Boulevard, a MOA shall be prepared ~~avoided~~ by the Expo Authority in consultation with the SHPO. The MOA would define the actions of the Expo Authority in implementing the project. The Expo Authority shall prepare a HPTP to identify measures ~~through sensitive design per the Secretary of Interior’s Standards to reduce the project’s adverse effects~~ project impacts to a level of less than significant. If the Secretary of Interior’s Standards are not met and an adverse visual intrusion is unavoidable, then mitigation shall include archival documentation to the level of Historic American Buildings Survey (HABS) standards through archival photography of the resource’s setting prior to significant cultural resources. The HPTP will ~~project construction, to be submitted to the SHPO as part of the MOA consultation and may be appended to the MOA for reference~~ local archives, although not requiring submittal to the Library of Congress.*

With the implementation of the mitigation measure above, impacts may be reduced to a level of **less than significant**.

#### **FEIR Design Options**

The Expo/Westwood Station No Parking, Sepulveda Grade Separation, Maintenance Facility Buffer, Colorado Parking Retention, and Colorado/4<sup>th</sup> Parallel Platform and South Side Parking design options would include physical modifications that would not directly impact any California Register-eligible historic architectural resources. The design options would have **no impact** on historic architectural resources.