

One Beverly Hills Overlay Specific Plan

Cultural Resources Technical Report

prepared by

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Table of Contents

Executive Summary 1
1 Introduction 5
1.1 Project Location 5
1.2 Project Description 5
1.3 Existing Specific Plans and Conclusions of Previous Environmental Documents 14
1.4 Personnel 17
2 Regulatory Framework 19
2.1 National Register of Historic Places 19
2.2 California Environmental Quality Act/California Register of Historical Resources 20
2.3 City of Beverly Hills 21
3 Cultural Setting 23
3.1 Prehistory 23
3.2 Ethnography 23
3.3 Historic Context 24
3.3.1 Beverly Hills 25
3.3.2 Mid-Century Modern Architecture (1945-1965) 27
3.3.3 Conrad Hilton 28
3.3.4 Welton Becket 29
3.3.5 Gin Dan Wong, FAIA 31
3.3.6 The Los Angeles Country Club 32
4 Methods 35
4.1 California Historical Resources Information System 35
4.2 Archival and Background Research 38
4.3 Previous Historical Evaluations 39
4.4 Native American Outreach 41
4.5 Field Survey 41
5 Results 43
5.1 Gas Station Site 45
5.2 9900 Wilshire Boulevard 45
5.3 Beverly Hilton Property 46
5.3.1 Updated Beverly Hilton Property Evaluation 59
5.4 Los Angeles Country Club 66
5.4.1 Physical Description 66
5.4.2 Updated LACC Historical Evaluation 66

6 Impacts Analysis, Mitigation, and Conclusions 73
6.1 Historical Resources Impacts 74
6.2 Archaeological Resources Impacts 83
6.3 Mitigation Measures/Best Management Practices 84
6.3.1 Built Environment Mitigation Measures 84
6.3.2 Archaeological Best Management Practices 84
6.4 Conclusions 85
7 References 87

Tables

Table 1 Characteristics of the Proposed Project 12
Table 2 Comparison of Approved and Proposed Entitlements on the Project Site 13
Table 3 Comparison of Existing Conditions and Proposed Entitlements on the Project Site 14
Table 4 Previously Recorded Cultural Resources within a 0.25-mile radius of the Project Site 35
Table 5 Previously Conducted Cultural Resources Studies within a 0.25-mile Radius of the Project Site 36
Table 6 Beverly Hilton Construction and Ownership Chronology 58
Table 7 Contributing Buildings and Features of the Beverly Hilton Property by Tier 63

Figures

Figure 1 Project Location 6
Figure 2 Detailed Project Location 7
Figure 3 Proposed Demolition Plan 9
Figure 4 Illustrative Site Plan 10
Figure 5 Properties that were Investigated as Part of this Study 44
Figure 6 Gas Station Site; View Southeast-Facing 45
Figure 7 Robinsons-May Site; View Northeast-Facing 46
Figure 8 Beverly Hilton Property 47
Figure 9 Wilshire Tower – View West from Santa Monica Boulevard 48
Figure 10 Wilshire Tower – View South from Wilshire Boulevard 49
Figure 11 Wilshire Tower – View East from Vehicle Entry Courtyard 49
Figure 12 Wilshire Edge Building – View South from Wilshire Boulevard 50
Figure 13 Wilshire Edge Building- View East from Wilshire Boulevard 51
Figure 14 Vehicle Entry Courtyard – View South of Courtyard Fountain, Southwest Wing, Palm/Oasis Court and Garage 52
Figure 15 Pedestrian Entry Courtyard – View East 52

Figure 16 Swimming Pool – View West, Facing Southwest Wing of Wilshire Tower, Lanai Rooms, and Garage 54
Figure 17 Swimming Pool and Lanai Rooms, View West 54
Figure 18 Palm/Oasis Court on Right and Parking Garage on Left – View West from Vehicle Entry Courtyard 55
Figure 19 Palm Oasis Court with Parking Garage at Right – View East on Merv Griffin Way 56
Figure 20 Waldorf-Astoria – View West from Wilshire Boulevard 57
Figure 21 Waldorf-Astoria – View West from Santa Monica Boulevard 57
Figure 22 Representative Photograph of the South Course 67
Figure 23 Representative Photograph of the North Course 67
Figure 24 Current Southeast-Facing View from the Roof of the Beverly Hilton 76
Figure 25 Current West-Facing View from the Beverly Hilton 77
Figure 26 Overview of Area Where Proposed Project Would be Visible 82
Figure 27 Close up View of Area Where Proposed Project Would be Visible 82
Figure 28 View from the North Course of Buildings that Line Santa Monica Boulevard 83

Appendices

Appendix A CHRIS Records Search Results
Appendix B SLF Search Results and Native American Outreach
Appendix C DPR Forms

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Executive Summary

The City of Beverly Hills (City) retained Rincon Consultants, Inc. (Rincon) to conduct a cultural resources study for the proposed One Beverly Hills Overlay Specific Plan (Overlay Specific Plan/proposed project) in support of the One Beverly Hills Overlay Specific Plan Supplemental Environmental Impact Report (SEIR) (current study). The Overlay Specific Plan is proposed for application to the 17.4-acre project site, which encompasses three contiguously located Los Angeles County Assessor's parcels (Assessor's Parcel Numbers [APN] 4327-028-003, 4327-028-016 and 4327-028-004 through 015) in Beverly Hills, California (project site).

The One Beverly Hills Overlay Specific Plan would allow for the comprehensive and coordinated redevelopment of the project site. It would result in the select demolition and alteration of existing buildings and the development of six buildings, in addition to small-scale features and gardens, on the project site. It would act as a standalone planning document and would not negate the two existing, previously approved Specific Plans (Existing Specific Plans) that currently regulate development on portions of the project site. Existing Specific Plans include: the 9900 Wilshire Specific Plan, certified in 2008, amended in 2016 and applicable to 9900 Wilshire Boulevard (APN 4327-028-016); and the Beverly Hilton Specific Plan, certified in 2008 and applicable to 9850-9876 Wilshire Boulevard (APN: 4327-028-004 through 015). Development on 9988 Wilshire Boulevard, also within the project site, is not currently regulated by either of the Existing Specific Plans.

The purpose of this study is to identify cultural resources that have the potential to be impacted by the proposed project. It builds off and incorporates previous cultural resources investigations prepared in support of the Existing Specific Plans. The proposed project includes several elements that have been previously analyzed for their potential impact to cultural resources as part of the environmental review process for the Existing Specific Plans. Due to their previous analysis, these elements are not further reanalyzed as part of the current study, which focuses on proposed project elements that have not been previously analyzed for their potential impact to cultural resources. Methods for the current study included a search of the California Historical Resources Information System (CHRIS) and the Native American Heritage Commission's Sacred Lands File (SLF), Native American outreach, background and archival research, a field survey of the project site, update of two historical evaluations and an assessment of impacts. All work was completed in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code (PRC) Sections 21000 et seq.; CEQA Guidelines (California Code of Regulations (CCR), Title 14, Chapter 3, Sections 15000 et seq.),and applicable local regulations.

The background research performed for this study confirmed that two portions of the project site, 9900 Wilshire Boulevard (9900 Wilshire Boulevard Site) and 9850-9876 Wilshire Boulevard (Beverly Hilton Site/Beverly Hilton property) have been previously subject to historic resource evaluation and that 9988 Wilshire Boulevard (gas station site) has not been previously subject to historic resource evaluation. Research additionally indicated that a small portion of 10101 Wilshire Boulevard (the Los Angeles Country Club [LACC]), located immediately adjacent to the project site, was subject to previous historic resource evaluation in 2011 and that the entirety of the property was identified as a potential historic resource by SurveyLA, a citywide historic resources survey of the city of Los Angeles, in 2015, although it was not formally evaluated at that time.

Formally occupied with the Robinsons-May Department Store, 9900 Wilshire Boulevard was previously found eligible for listing in the California Register of Historical Resources (CRHR) and the Beverly Hilton property was found eligible for listing in the National Register of Historic Places (NRHP) and CRHR. Since the time of their most recent evaluation, the Robinsons-May Department Store was demolished, and the Beverly Hilton property has undergone various alterations including the demolition of half of the Wilshire Edge Building and the construction of the Waldorf Astoria Beverly Hills within its boundaries. Additionally, the City adopted a Historic Preservation Ordinance (2012) since these resources were last evaluated. To address these changes in existing condition and regulatory setting, the current study includes updated historical evaluations of 9900 Wilshire Boulevard and the Beverly Hilton property.

The Robinsons-May Department Store, the primary feature contributing to the significance of 9900 Wilshire Boulevard, was demolished in 2014. As a result, 9900 Wilshire Boulevard is no longer eligible for listing in the CRHR and is not considered a historical resource for the purpose of CEQA. Rincon concurs with the previous historical evaluations, that the Beverly Hilton property is significant under NRHP and CRHR Criteria A/1, B/2, and C/3 for its direct and important associations with post-war commercial and cultural history, Conrad Hilton, and Welton Becket as well as its noteworthy architectural features. In addition, the property appears to meet the criteria for local landmark designation because of these significant associations. Its period of significance spans 1953, beginning with its initial development, to 1966, extending through its subsequent expansion, designed and built by Welton Becket and Conrad Hilton, respectively. The property has undergone demolition and alteration following the period of significance such that its historic integrity has been compromised and it no longer appears eligible for listing in the NRHP as a property or collection of buildings. Nevertheless, the property currently remains eligible for listing in the CRHR and local designation and remains a historical resource for the purposes of CEQA. Additionally, Wilshire Tower may qualify as an individual resource for listing in the NRHP, CRHR and as a City of Beverly Hills Landmark.

A portion of the LACC property was found eligible for listing in the NRHP and CRHR in 2011 (Daly 2011). However, the historical significance of the entirety of the property was not explored at that time. The property was additionally identified by SurveyLA, a citywide survey undertaken by the city of Los Angeles, in 2015, although it was not formally evaluated as part of that effort (City of Los Angeles 2015). To ensure that potential impacts to properties immediately adjacent to the proposed project site were adequately considered, the current study also performed an updated historical evaluation of the LACC property.

As a result of the current study, the LACC property is recommended eligible for listing in the NRHP and CRHR at the local level of significance under Criteria A/1 for its association with the broad patterns of local history, specifically the early development of private recreational facilities in the city of Los Angeles. Additionally, the property's North Course is eligible for listing in the CRHR under Criteria C/3 as an excellent example of a 1920s golf course designed by master golf course architects George C. Thomas Jr. and William "Billy" Bell during a period known as the golden era of golf course design. Its period of significance spans from 1911 to 1928, corresponding to the year of its initial development through the expansion of its boundaries and its last major redesign by George C. Thomas and William Bell. Due to its eligibility for listing in the NRHP and CRHR, the LACC property is considered a historical resource for the purposes of CEQA.

In comparison to existing conditions and approved entitlements under the Existing Specific Plans, the proposed project would have a significant impact on the Beverly Hilton property due to proposed demolition and construction activities. In addition to the demolition of six contributing

buildings and structures, six new buildings would be constructed throughout the project site as a result of the Overlay Specific Plan; two buildings would be constructed on the Beverly Hilton property, the Conference Center (31 feet tall) and the Beverly Hilton Enhancement (just under 20 feet tall), and four buildings would be constructed on the western portion of the project site, the Santa Monica Residences (410 feet tall), Garden Residences (369 feet tall), the Wilshire Building (124 feet tall) and Park Pavilion (20 feet tall)[1]. Similar to the Beverly Hilton Specific Plan, the demolition of buildings that contribute to the character of the Beverly Hilton property and the construction of new buildings on the property and in its immediate vicinity would materially impair the Beverly Hilton Property. Regardless of whether the project is compared to existing conditions or buildout of the Existing Specific Plans, despite implementation of Mitigation Measures MM CR-5 and MM CR-6, the proposed project would result in a significant adverse impact to a historical resource.

The proposed project would demolish a greater number of contributing buildings and features than the Beverly Hilton Specific Plan 2008 EIR identified for the Beverly Hilton Specific Plan because the updated historic evaluation contained herein expanded the property's period of significance to 1966 and identifies the Palm/Oasis Court and the Parking Garage and Lanai Rooms as contributing buildings and features, whereas the 2007 Jones & Stokes assessment prepared for the Beverly Hilton Specific Plan did not (City of Beverly Hills 2008a). However, in comparison to existing conditions, both buildout of the Existing Specific Plans and the proposed project would result in demolition of the same number of contributing buildings and features. Therefore, the significant and unavoidable historical resources impact of the proposed project would not be more severe than that of the Existing Specific Plans. Under both scenarios, despite the fact that Wilshire Tower may qualify for historic designation as an individual resource, the integrity of the Beverly Hilton property as a collection of buildings would be degraded such that it would be ineligible for listing in the CRHR.

When compared to existing conditions, the proposed project would not have a significant impact on the LACC property. All components proposed for construction under the Overlay Specific Plan would be developed and operate on the project site, which is located adjacent to and outside the boundaries of the LACC property. While the proposed buildings may cast a shadow on a portion of the property (specifically on a small portion of the South Course), the shadow analysis conducted in support of the Initial Study for the project indicates that the project would not result in prolonged periods of shade and shadow on the property (City of Beverly Hills 2020). Increased shade on the property would not alter any of its character-defining features such that they would be materially impaired. Additionally, potential impacts as a result of increased shade on the property are limited to a small portion of the over 300-acre property and would not impact the property's overall character. Therefore, implementation of the Overlay Specific Plan would not physically demolish, destruct, relocate, or alter directly any portion of the LACC property.

While the proposed project would alter the immediate surroundings of the LACC property, these alterations would not materially impair its significance. The proposed project would construct several tall buildings in the property's immediate vicinity. However, since its period of significance, the property's immediate surroundings and larger setting have been progressively developed to include large-scale buildings such as those located along the Wilshire Corridor and in Century City such that the property's integrity of setting outside of its boundaries has been largely diminished. While implementation of the Overlay Specific Plan would minimally alter the property's immediate

[1] Measured from +301 AMSL datum. Note the datum has changed between the Existing Specific Plans and the proposed project because the Municipal Code requires the height of commercial buildings to be measured from the highest point on the sidewalk adjacent to the site. Because the gas station site is included in the project site, the datum was adjusted to reflect the highest point on the sidewalk adjacent to the project site, which is a location adjacent to the gas station site.

surroundings, it would not materially impair its significance. Following implementation of the Overlay Specific Plan, the property would retain sufficient integrity to convey its significance and would remain eligible for listing in the NRHP and CRHR. Potential impacts of the proposed project on the LACC property as a historical resource were not considered in previous environmental documents prepared in support of the Existing Specific Plans. The Overlay Specific Plan would construct taller buildings located in closer proximity to the LACC property when compared to those approved by the Existing Specific Plans. However, as discussed above, while these proposed buildings would alter the immediate surroundings of the LACC property, they would not result in material impairment of the property's significance and impacts to the property as a result of the project would be less than significant.

The CHRIS and SLF searches failed to identify any archaeological resources within the project site or a 0.25-mile radius around it. The archaeological field survey of 9900 Wilshire Boulevard, the only undeveloped portion of the project site, indicates that this portion of the project site is highly disturbed due to the historical use of the property and recent demolition activities. The remainder of the project site is developed with buildings and paved surfaces including parking lots and sidewalks. These surfaces have been previously graded, disturbed, and developed, and no archaeological resources are known to have been discovered. As a result of the conditions summarized above, the likelihood of encountering undisturbed archaeological resources is unlikely. The proposed project would result in no impact to archaeological resources.

Rincon recommends the following best management practices be implemented to reduce potential impacts to unanticipated archaeological resources to a less than significant level: retain a qualified archaeologist to carry out all mitigation measures related to archaeological resources; if unanticipated cultural deposits are identified, stop work within the vicinity of the find and notify the qualified archaeologist; and if human remains are discovered, immediately stop work in the vicinity of the find and notify the Los Angeles County Coroner.

1 Introduction

The City of Beverly Hills (City) retained Rincon Consultants, Inc. (Rincon) to conduct a cultural resources study for the proposed One Beverly Hills Overlay Specific Plan (Overlay Specific Plan/proposed project) in support of the One Beverly Hills Overlay Specific Plan Supplemental Environmental Impact Report (SEIR). The Overlay Specific Plan is proposed for application to 9850, 9876, 9900, and 9988 Wilshire Boulevard in Beverly Hills, California (project site). The purpose of this study is to identify cultural resources that have the potential to be impacted by the proposed project. It includes a search of the California Historical Resources Information System (CHRIS) and the Native American Heritage Commission's Sacred Lands File (SLF), Native American outreach, background and archival research, a field survey of the project site, update of two historical evaluations and an assessment of impacts. All work was completed in accordance with the requirements of the California Environmental Quality Act (CEQA) and applicable local regulations; the City of Beverly Hills is the lead agency for the purposes of CEQA.

1.1 Project Location

The 17.4-acre project site is located west of the intersection of Wilshire Boulevard and Santa Monica Boulevard at the western edge of the City of Beverly Hills. It is approximately seven miles west of the Los Angeles Civic Center and six miles northeast of Santa Monica. Traveling along Santa Monica Boulevard, the project site is approximately 2.25 miles northeast of Interstate 405 (I-405). Figure 1 shows the project location on a regional scale.

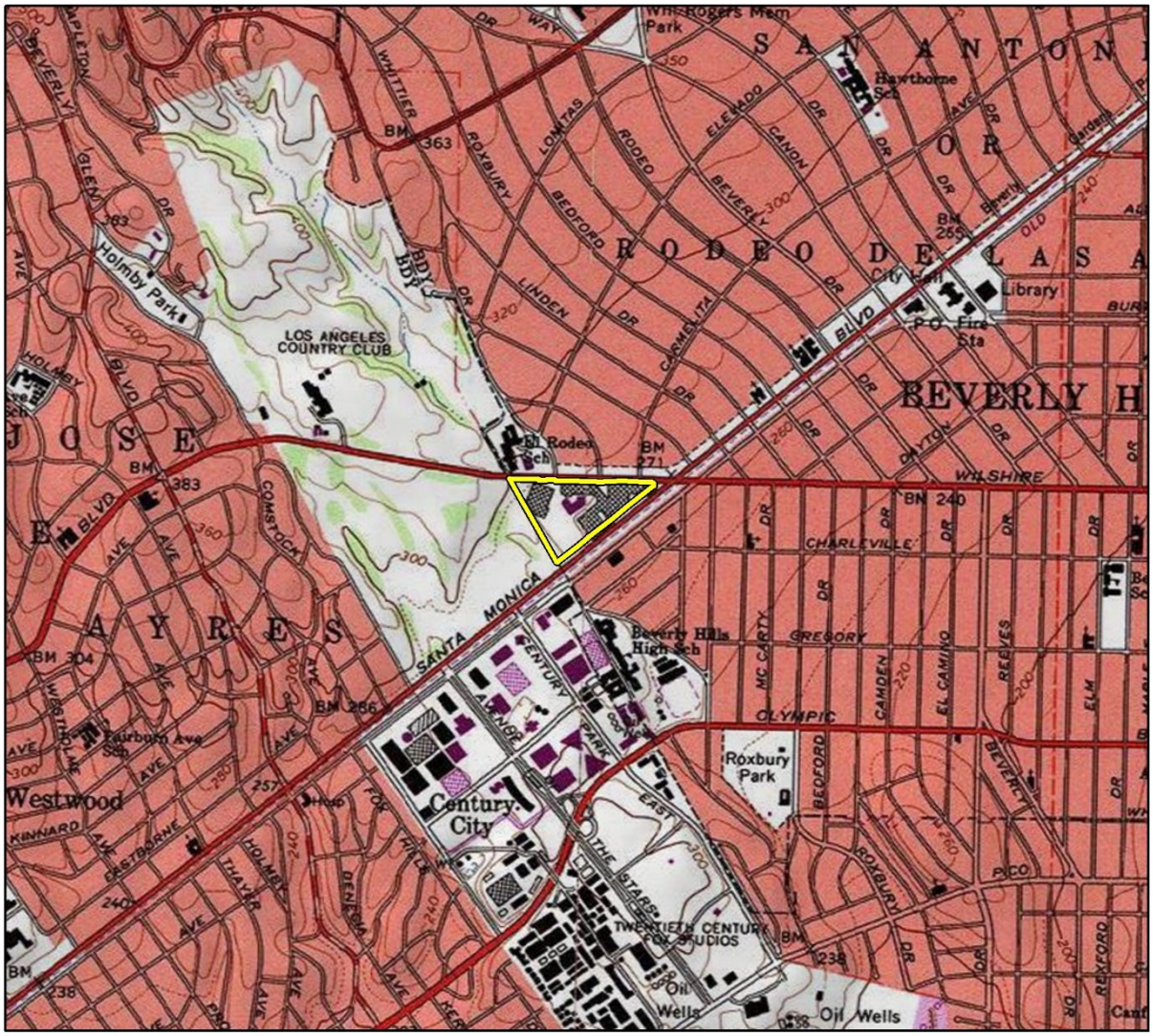
Approximately 54 percent of the project site is developed with existing structures and impervious surfaces and 46 percent is graded and undeveloped. It currently contains two hotels, the historic-period Beverly Hilton and the recently constructed Waldorf Astoria Beverly Hills, and related facilities at 9850-9876 Wilshire Boulevard (Beverly Hilton property), a currently non-operational gas station and convenience store at 9988 Wilshire Boulevard (gas station site), and a vacant, partially excavated property at 9900 Wilshire Boulevard. Merv Griffin Way, a four-lane, north-south, private access road that is open to public use, traverses the project site. Figure 2 shows the project site on a local scale and identifies the three portions of the site descried above.

1.2 Project Description

The proposed project would establish a new Overlay Specific Plan to allow for the comprehensive and coordinated redevelopment of the project site. The One Beverly Hills Overlay Specific Plan would be a standalone planning document. It would not negate the Beverly Hilton Specific Plan or the 9900 Wilshire Specific Plan (Existing Specific Plans), which currently regulate development on portions of the project site; it would also not negate the current C-3 zoning of the gas station site. The proposed project would overlay the project site and could be used to regulate its future development instead of the Existing Specific Plans and C-3 zoning of the gas station site s, upon collective approval of all property owners and lenders.

Existing Specific Plans included the following elements previously analyzed for their potential impact to cultural resources:

Figure 1 Project Location



Imagery provided by National Geographic Society, Esri and its licensors © 2020. Beverly Hills Quadrangle. T01S R15W S23,24. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may havechanged since the original topographic map was assembled.

CRFig 1 Proj Locn Map

Figure 2 Detailed Project Location



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- Demolition of Robinsons-May Department Store
- Redevelopment of 9900 Wilshire Boulevard with 193 condominium units and a 134-room luxury hotel in two buildings, along with an ancillary building for publicly accessible amenities, including approximately 16,057 sf of hotel restaurant space, 7,942 sf of meeting space, 14,435 sf of spa and fitness, and other guest amenities space under the 2016 9900 Wilshire Specific Plan
- Demolition of the Wilshire Edge Building, the Vehicle Entry Courtyard and the Swimming Pool
- Redevelopment of the Beverly Hilton property with a hotel, conference center and commercial building under the Beverly Hilton Specific Plan

The Beverly Hilton Specific Plan 2008 EIR and the 9900 Wilshire Specific Plan 2016 SEIR (herein referred to as previous environmental documentation) determined that implementation of the Existing Specific Plans would result in significant impacts to built environment resources and less than significant impacts to archaeological resources.

Similar to the Existing Specific Plans, the Overlay Specific Plan would include demolition of the Wilshire Edge Building, the Vehicle Entry Courtyard, and the Swimming Pool, which was previously analyzed in the Beverly Hilton Specific Plan 2008 EIR (City of Beverly Hills 2008a). The Robinsons-May Department Store was demolished in 2014 and is not included as part of the project. The Overlay Specific Plan includes the following elements not previously analyzed for their potential impact to cultural resources:

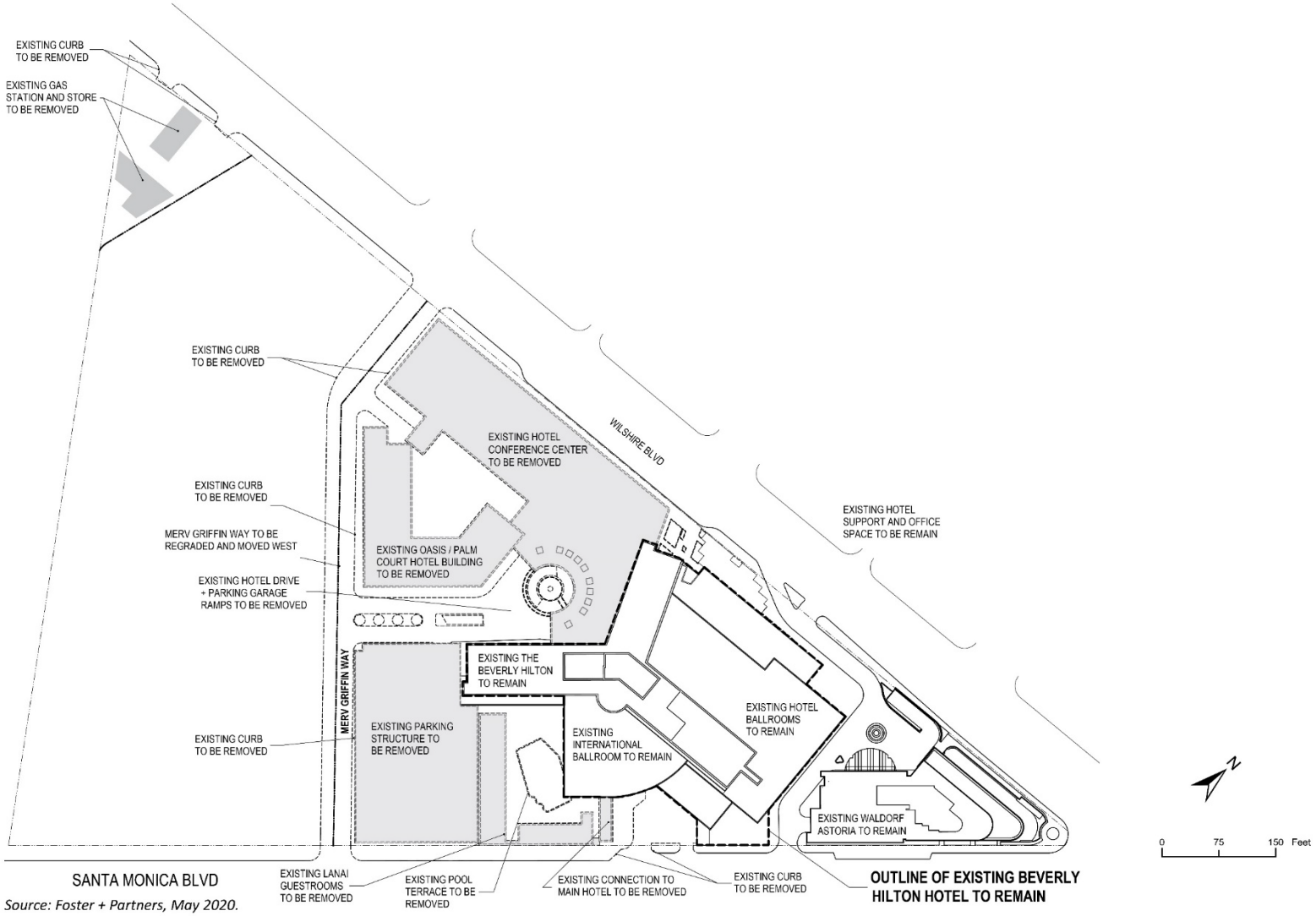
- Demolition of existing gas station at 9988 Wilshire Boulevard and integration of 9988 Wilshire Boulevard (gas station site) into the project site
- Demolition of Palm/Oasis Court, Parking Garage and Lanai Rooms, which were not considered historical resources at the time the Existing Specific Plans were approved
- Redistribution of previously approved floor area ratios (FAR) resulting in increased building heights and the construction of six buildings spread throughout the project site

As part of the Overlay Specific Plan, the applicant has proposed that the FAR[2] and land uses within the Overlay Specific Plan area approximate the overall approved FAR and land uses authorized by the Existing Specific Plans, with the addition of allowable floor area assumed for the gas station site (identified in the project application as a 'calculated entitlement' of approximately 58,350 square feet [sf]). The proposed Overlay Specific Plan would redistribute the previously approved Existing Specific Plans floor areas and the 'calculated entitlement' floor area throughout the project site in a unified development plan and allow for increased building heights to provide approximately 13.4 acres of open space including a publicly accessible botanical garden and a sculpture garden along Wilshire Boulevard. A proposed demolition plan and illustrative site plan that correspond to buildout of the Overlay Specific Plan are included as Figure 3 and Figure 4.

Implementation of the proposed Overlay Specific Plan would result in the development of six buildings spread throughout the project site; these include two residential buildings, one combined hotel/residential building, a parking structure, and two additional buildings to contain supporting amenities and features. An elevated platform over Merv Griffin Way from the Beverly Hilton to the southwesterly property line would consist of an 8-acre botanical garden that would include native

[2] Floor area ratio (FAR) is the measurement of a building's floor area in relation to the size of the parcel on which the building is located. FAR is expressed as a decimal number and is derived by dividing the total area of the building by the total area of the parcel (building area ÷ parcel area).

Figure 3 Proposed Demolition Plan



Source: Foster + Partners, May 2020.

Figure 4 Illustrative Site Plan



and cultured[3] California plant species, sculptures, water features, shaded seating areas, two miles of walking/running pathways, a restaurant, and other amenities. One mile of pathways within approximately 4.5 acres of the botanical gardens would be accessible to the public, and one mile of pathways within approximately 3.5 acres of the botanical gardens would be reserved for residents, the Amenities Access Program (AAP),[4] and hotel guests.

Primary access to the project site would be provided by a reconstructed Merv Griffin Way, which would include access points for the Beverly Hilton lobby entrance and the new below-ground parking structure. Merv Griffin Way would continue to function as a publicly accessible private road between Wilshire Boulevard and Santa Monica Boulevard. A new private road along the southwestern property line would provide access to the residential buildings, the new luxury hotel and residences building, and the below-ground parking structure.

Table 1 summarizes the characteristics of the proposed project. Table 2 presents the approved entitlements under the Existing Specific Plans and provides a comparison of the approved entitlements to those of the proposed Overlay Specific Plan. Table 3 summarizes the existing conditions of the project site and compares the existing conditions to those of the proposed entitlements.

[3] Cultured California plant species refers to drought-tolerant, non-invasive plants.
[4] The AAP would allow up to 250 non-residents/non-hotel guests to access the residential and hotel amenity spaces subject to guidelines, bylaws, and rules established for the AAP.

Table 1 Characteristics of the Proposed Project

	On the Beverly Hilton Site	On the 9900 Wilshire Boulevard Site and Gas Station Site
Lot Area (sf)	389,597	368,467
Total Building Floor Area (sf)	Beverly Hilton Hotel (E): 350,789 Waldorf Astoria Hotel (E): 207,026 Conference Center (N): 37,562 Beverly Hilton Enhancement (N): 72,697	Santa Monica Residences (N): 499,806 Garden Residences (N): 424,266 Wilshire Building (N): 213,966 Promenade and Park Pavilion (N): 127,324[1]
Building Heights[2]	Beverly Hilton Hotel (E): 79'-1"[3] Waldorf Astoria Hotel (E): 124'-0"[3] Conference Center (N): 31'-0"[3] Beverly Hilton Enhancement (N): 19'-6"[3]	Santa Monica Residences (N): 410'-0"[3] Garden Residences (N): 369'-0"[3] Wilshire Building (N): 124'-0"[3] Park Pavilion (N): 20'- 1"[3] Promenade[4] (N): 5'-0"[3]
Residences (units [sf])	0 [0]	340 [1,024,553]
Hotels (rooms [sf])	558 [632,838]	42 [113,485]
Shared Hotel/Residential Amenities[1] (sf)	0	117,232
Accessory Spaces (units [sf])[1]	0 [0]	30 [10,092]
Retail (sf)	35,236	0
Total Project Parking Spaces	**2,179[5,6]**	
Total Project Private Open Space (sf)[7]	**174,240[5]**	
Total Project Public Open Space (sf)[8]	**409,412[5]**	
Total Project Combined Open Space area (sf)	**583,652[5,8]**	

sf= square feet; (E)= existing; (N)= new

[1] Accessory spaces located in the Promenade are accounted for in the square-footage reported for "Accessory Spaces" and "Shared Hotel/Residential Amenities" reports square-footage for shared hotel/residential amenities space in the promenade. Accessory spaces are spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage), a park pavilion, a spa, and support space).

[2] Due to natural variation in the elevations across the project site, building heights are measured from a horizontal plane of reference from which all vertical dimensions are measured (or datum level) so that the reported building heights can be standardized and comparable to one another.

[3] Measured from +301 above mean sea level (AMSL) datum. Note the datum has changed between the Existing Specific Plans and the proposed project because the Municipal Code requires the height of commercial buildings to be measured from the highest point on the sidewalk adjacent to the site. Because the gas station site is included in the project site, the datum was adjusted to reflect the highest point on the sidewalk adjacent to the project site, which is a location adjacent to the gas station site.

[4] The Promenade is a shared hotel/residential amenity space that connects the buildings and contains the Park Pavilion Building

[5] Includes the entire project site (Beverly Hilton site, 9900 Wilshire Boulevard site, and gas station site) three parcels of the project site

[6] The project includes 1,865 new parking spaces. In addition, 314 existing parking spaces would remain at the Waldorf Astoria Hotel

[7] Private open space would be reserved for hotel guests and residents

[8] Open space includes the gardens and other landscaped areas, water features and pools, publicly accessibleroadways/walking paths, and similar areas. Public open space area is inclusive of the 10 acres associated with portions ofthe project site proposed to be modified and 3.4 acres of unmodified open space areas associated with the existing Beverly Hilton and the existing Waldorf-Astoria Beverly Hills.

Table 2 Comparison of Approved and Proposed Entitlements on the Project Site

	Currently Approved Entitlements and Existing C-3 Zoning[1]	Proposed Entitlements	Net Change (Proposed Entitlements – Currently Approved)
Residences (units [sf])	303 [1,068,676]	340 [1,024,553]	+37 [-44,123]
Hotels (rooms [sf])	656 [806,403]	600 [746,323]	-56 [-60,080]
Shared Hotel/Residential Amenities[2] (sf)	0	117,232	+117,232
Accessory Spaces (units [sf])	0 [0]	30 [10,092]	+30 [+10,092]
Retail Floor Area (sf)	46,686[3]	35,236[4]	-11,450
Total Floor Area Ratio	2.54[3]	2.55	0.01
Maximum Building Height	9900 Wilshire Boulevard Site: 185'-0"[5] Gas Station Site: 45'-0"[9] Beverly Hilton Site: 200'-0"[6]	9900 Wilshire Boulevard Site: 410'-0"[7] Gas Station Site: 124'-0"[7] Beverly Hilton Site: 124'-0"[7]	9900 Wilshire Boulevard Site: +236'-0"[8] Gas Station Site: +79'-0" Beverly Hilton Site: -60'-0"[8]
Parking Spaces	3,323	2,179	-1,144

[1] Sources: City of Beverly Hills 2008a and 2016

[2] Shared amenity space includes the Promenade and a park pavilion building

[3] Average of the 2.0 FAR for the gas station site (9988 Wilshire Boulevard) allowable under C-3 zoning and the 2.55 FAR for the remainder of the project site (9900 Wilshire Boulevard site and Beverly Hilton site). The retail floor area estimate is based on this 2.0 FAR allowable under C-3 zoning.

[4] 35,236 sf of proposal retail includes the Santa Monica Retail component of the Beverly Hilton Enhancement only. All hotel retail uses are captured under hotel land use.

[5] Measured from +290 datum

[6] Measured from +285 datum

[7] Measured from +301 datum

[8] Height difference measures physical difference (adjusted for datum difference)

[9] Gas station site maximum height is the maximum height allowed under C-3 zoning

Table 3 Comparison of Existing Conditions and Proposed Entitlements on the Project Site

	Existing Conditions	Proposed Entitlements	Net Change (Proposed Entitlements – Currently Existing)
Residential Uses (units [sf])	0	340 [1,024,553]	+1,024,553
Hotel Uses (units [sf])	724,649	600 [746,323]	+21,674
Shared hotel/residential amenities[1] (sf)	0	117,232	+117,232
Accessory Spaces (units [sf])	0 [0]	30 [10,092]	+30 [+10,092]
Retail Floor Area (sf)	0	35,236	+35,236
Gas Station Floor Area (sf)	3,521	0	-3,521
Total Floor Area Ratio	0.96	2.55	+1.59
Maximum Building Height	9900 Wilshire Boulevard Site: 0'-0" Gas Station Site: 21'-10" Beverly Hilton Site: 124'-0"	9900 Wilshire Boulevard Site: 410'-0"[2] Beverly Hilton Site: 124'-0"[2]	9900 Wilshire Boulevard Site: +410'-0" Beverly Hilton Site: +0'-0"
Parking Spaces	1,239	2,179	+940

[1] Shared amenity space includes the Promenade and Park Pavilion Building.

[2] Measured from +301 datum

1.3 Existing Specific Plans and Conclusions of Previous Environmental Documents

9900 Wilshire Specific Plan & the Final SEIR for the 9900 Wilshire Boulevard (One Beverly Hills) Project

The 9900 Wilshire Specific Plan applies to the 9900 Wilshire Boulevard Site, which is currently vacant and graded. The City approved the 9900 Wilshire Specific Plan and certified its accompanying 9900 Wilshire Project Final Environmental Impact Report (FEIR) in 2008. The 9900 Wilshire Specific Plan was amended, and in 2016, the City certified the corresponding Supplemental EIR (SEIR) (9900 Wilshire Specific Plan 2016 SEIR). The 9900 Wilshire Specific Plan allows for the development of up to 193 condominium units and a 134-room luxury hotel in two buildings, along with an ancillary building for publicly accessible amenities including approximately 16,057 sf of hotel restaurant, 7,940 sf of meeting space, 14,435 sf of spa and fitness, and other guest amenities (City of Beverly Hills 2016).

The 2008 FEIR concludes that impacts to historical resources as a result of the 9900 Wilshire Specific Plan would be significant and unavoidable despite implementation of Mitigation Measure MM CR-1 (detailed below). The 9900 Wilshire Specific Plan included the demolition of the Robinsons-May Department Store, a building previously found eligible for listing in the CRHR. Therefore, its implementation was determined to result in a significant impact to historical resources. The Robinsons-May Department Store was demolished in 2014 and is no longer extant within the

current project site. Prior to the building's demolition, Mitigation Measure MM CR 1 was implemented and is therefore no longer active or applicable to the proposed project.

The 2008 FEIR concludes further that there were potentially historic streetlights along the edge of the project site which could have be potential to be impacted by the project. To address these impacts, Mitigation Measure MM CR-2, detailed below, was adopted. MM CR-2 required that potentially historic streetlights in the vicinity of the project site be preserved and reinstalled as appropriate. In 2011, these streetlights were removed and replaced under a separate project by the City of Beverly Hills Department of Public Works. The replacement streetlights are similar in design and character as the streetlights identified in the 2008 FEIR. As the potentially historic streetlights identified in 2008 are no longer extant, Mitigation Measure MM CR-2 is no longer active or applicable to the proposed project.

The proposed project has the potential to impact archaeological resources in a manner consistent with potential impacts identified in the 2008 FEIR. Therefore, Mitigation Measure MM CR-3 remain active and applicable to the proposed project. No additional measures were required by the 2016 FEIR.

MM CR-1 The Robinsons-May department store shall be photographed with large-format black-and-white photography, and a written report which follows Historic American Buildings Survey ("HABS")/Historic American Engineering Record ("HAER") standards at a minimum Level 3 Recordation. The documentation shall be donated to a suitable repository, such as the City of Beverly Hills Public Library. The cost shall be borne by the Applicant. *[Fully implemented prior to demolition in 2014 and thus no longer applicable.]*

MM CR-2 Potentially historic streetlights adjacent to the project site shall be preserved and reinstalled along this section of Wilshire Boulevard and Santa Monica Boulevard, as appropriate, in consultation with the project proponents, the City of Beverly Hills, and an architectural historian qualified under the Secretary of the Interior's Standards. *[Potentially historic streetlights no longer remain and thus Mitigation Measure MM CR-2 is no longer applicable.]*

MM CR-3 In the event a previously unknown artifact is uncovered during project construction, all work shall cease until a certified archaeologist can investigate the finds and make appropriate recommendations. Any artifacts uncovered shall be recorded and removed for storage at a location to be determined by the monitor.

Beverly Hilton Specific Plan

The City adopted the Beverly Hilton Specific Plan and certified its accompanying EIR in 2008. It applies to the portion of the project site located at 9850-9876 Wilshire Boulevard, the Beverly Hilton property. The property contains the Beverly Hilton and the Waldorf Astoria Beverly Hills. The Waldorf Astoria, which opened in 2017, was constructed as the first phase of the Beverly Hilton Specific Plan. The Beverly Hilton Specific Plan allows for the additional development of 110 condominium units and the demolition and reconstruction of approximately 51,600 sf of retail, restaurant, meeting, and office space.

The 2008 FEIR concludes that impacts to historical resources as a result of implementation of the Beverly Hilton Specific Plan would be significant and unavoidable despite implementation of Mitigation Measure MM CR-1 (detailed below). Specifically, the Beverly Hilton Specific Plan includes the demolition of portions of the Beverly Hilton property, including the following NRHP and CRHR-

eligible buildings and features: the Wilshire Edge Building (inclusive of the former Trader Vic's Restaurant), the Vehicle Entry Courtyard, and the Swimming Pool. As the plan included the demolition of historical resources, its implementation was determined to result in a significant impact to historical resources. Mitigation Measure MM CR-1 was completed by Historic Resources Group (HRG) in 2014 and is therefore no longer active and applicable to the proposed project.

The 2008 FEIR indicated that implementation of Mitigation Measures MM CR-2 and MM CR-3 (detailed below) would reduce project related impacts to potentially historic streetlights along Wilshire and Santa Monica Boulevards and potentially historic signposts along Merv Griffin Way to a less than significant level. As noted above, the potentially historic streetlights described in the 2008 FEIR were removed from the sidewalk ROW surrounding the project site in 2011 (Google Earth Pro 2020). As they no longer remain, the proposed project does not have the potential to impact these potentially historic streetlights. Impacts related to potentially historic signposts associated with the proposed project are consistent with those analyzed in the 2008 FEIR. Therefore, while Mitigation Measures MM CR-2 is no longer active or applicable to the proposed project, Mitigation Measure MM CR-3 remains active and applicable to the proposed project. Similarly, the 2008 FEIR concludes that potential impacts to archaeological resources and human remains would be less than significant with the implementation of Mitigation Measure MM CR-4 (detailed below). As the potential impacts of the proposed project are consistent with those analyzed in the 2008 FEIR, Mitigation Measure MM CR-4 remains active and applicable to the proposed project.

MM CR-1 Components of The Beverly Hilton to be demolished shall be photographed with large-format black and white photography, and a written report which follows to Historic American Buildings Survey (HABS) / Historic American Engineering Record (HAER) standards at a minimum Level 3 Recordation. This documentation shall be donated to a suitable repository, such as the City of Beverly Hills Public Library. The costs shall be borne by the Applicant. *[Fully implemented prior to demolition in 2014 and thus no longer applicable.]*

MM CR-2 Potentially historic street lights adjacent to the project site shall be preserved and reinstalled along this section of Wilshire Boulevard and Santa Monica Boulevard, as appropriate, in consultation with the project proponents, the City of Beverly Hills, and an architectural historian qualified under the Secretary of the Interior's Standards. *[Potentially historic streetlights were removed in 2011 and thus Mitigation Measure MM CR-2 is no longer applicable.]*

MM CR-3 Potentially historic sign posts adjacent to the project site on Merv Griffin Way shall be preserved and reinstalled in approximately the same locations, as appropriate, in consultation with the project proponents, the City of Beverly Hills, and an architectural historian qualified under the Secretary of the Interior's Standards.

MM CR-4 If buried cultural resources are encountered during construction, all work shall be halted in the vicinity of the archaeological discovery until a qualified archaeologist can assess the nature and significance of the archaeological discovery, per CEQA Guidelines Section 15064.5 (f). Recovery of significant archaeological deposits, if necessary, shall include but not be limited to, manual or mechanical excavations, monitoring, soils testing, photography, mapping, or drawing to adequately recover the scientifically consequential information from and about the archaeological resource. Further treatment may be required, including site recordation, excavation, site evaluation, and data recovery. Any artifacts uncovered shall be

recorded and removed for storage at a location to be determined by the archaeologist.

1.4 Personnel

This cultural resources study was managed by Rincon Architectural Historian, Rachel Perzel, M.A. Ms. Perzel is a co-author of this report and performed the SLF search described herein. Rincon Senior Architectural Historian, Steven Treffers, M.A., conducted the archival research and historical evaluations and is a co-author of this report. The site visit was performed by Cultural Resources Specialist, Alexandra Madsen, M.A. Ms. Perzel, Mr. Treffers and Ms. Madsen meet the Secretary of the Interior's *Professional Qualification Standards* (PQS) for architectural history and history (NPS 1983). The CHRIS search was conducted by in-house staff at the South Central Coastal Information Center (SCCIC). Rincon Cultural Resources Principal Investigator, Breana Campbell-King, M.A., Registered Professional Archaeologist (RPA), served as Principal Investigator for the archaeological resources portion of this study. The Native American Outreach was conducted by Archaeologist, Dustin Merrick. Ms. Campbell and Mr. Merrick meet the Secretary of the Interior's PQS for prehistoric and historic archaeology. The figures found in this report were prepared by Geographic Information System (GIS) Specialist, Allyson Valencia. Rincon Principal, Shannon Carmack, reviewed this report for quality control.

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2 Regulatory Framework

This section includes a discussion of the applicable state and local laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during implementation of the proposed project.

2.1 National Register of Historic Places

The National Register of Historic Places (NRHP) was established by the National Historic Preservation Act (NHPA) of 1966 as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (CFR 36 CFR 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;

Criterion B: It is associated with the lives of persons who are significant in our past;

Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or

Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting these criteria, a property must retain historic integrity, which is defined in National Register Bulletin 15 as the "ability of a property to convey its significance" (National Park Service [NPS] 1990). In order to assess integrity, the NPS recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, which are defined in the following manner in National Register Bulletin 15:

- **Location.** The place where the historic property was constructed or the place where the historic event occurred;
- **Design.** The combination of elements that create the form, plan, space, structure, and style of a property;
- **Setting.** The physical environment of a historic property;
- **Materials.** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
- **Workmanship.** The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;

- **Feeling.** A property's expression of the aesthetic or historic sense of a particular period of time; and/or
- **Association.** The direct link between an important historic event or person and a historic property.

2.2 California Environmental Quality Act/California Register of Historical Resources

CEQA requires that a lead agency determine whether a project could have a significant impact on historical resources (PRC Section 21084.1). A historical resource is a resource listed in or determined to be eligible for listing in the CRHR (PRC Section 21084.1), a resource included in a local register of historical resources (CEQA Guidelines Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CEQA Guidelines Section 15064.5[a][3]).

PRC Sections 5024.1, 21083.2 and 21084.1 and Section 15064.5 of the CEQA Guidelines were used as the basic guidelines for this historic resource study. PRC Section 5024.1 requires an evaluation of historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the state's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR, enumerated below, were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP.

According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (1) retains substantial integrity and (2) meets at least one of the following CRHR criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. It is associated with the lives of persons important in our past.
3. It embodies the distinctive characteristics of a type, period, region, or method of installation; or represents the work of an important creative individual; or possesses high artistic values.
4. It has yielded or may be likely to yield information important in prehistory or history.

Impacts to significant cultural resources are considered a significant effect on the environment if such impacts affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Guidelines, Section 15064.5 [b][1], 2000). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR (CEQA Guidelines, Section 15064.5[b][2][A]).

2.3 City of Beverly Hills

The City's Historic Preservation Ordinance (Municipal Code Title 10 Chapter 3 Article 32; BHMC 10-3-3212) authorizes the Cultural Heritage Commission (CHC) to recommend the nomination of properties as local landmarks to the City Council. The Council may designate local landmarks and historic districts by the procedures outlined in the ordinance. An eligible property may be nominated and designated as a landmark if it satisfies the requirements set forth below.

A. A landmark must satisfy all of the following requirements:
   1. It is at least forty-five (45) years of age, or is a property of extraordinary significance;
   2. It possesses high artistic or aesthetic value, and embodies the distinctive characteristics of an architectural style or architectural type or architectural period;
   3. It retains substantial integrity from its period of significance; and
   4. It has continued historic value to the community such that its designation as a landmark is reasonable and necessary to promote and further the purposes of this article.

B. In addition to the requirements set forth in subsection A of this section, a landmark must satisfy at least one of the following requirements:
   1. It is listed on the National Register of Historic Places;
   2. It is an exceptional work by a master architect;
   3. It is an exceptional work that was owned and occupied by a person of great importance and was directly connected to a momentous event in the person's endeavors or the history of the nation. For purposes of this subsection B3, personal events such as birth, death, marriage, social interaction, and the like shall not be deemed to be momentous;
   4. It is an exceptional property that was owned and occupied by a person of great local prominence;
   5. It is an iconic property; or
   6. The landmark designation procedure is initiated, or expressly agreed to, by the owner(s) of the property (Ord. 15-O-2682, eff. 11-19-2015).

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3 Cultural Setting

The project area is located within the City of Beverly Hills. None of the surrounding area retains its natural setting because the project area is fully developed.

3.1 Prehistory

The project site is located within the City of Beverly Hills. The prehistoric chronological sequence that is applicable to near-coastal and many inland areas within southern California is generally divided into four periods: Early Man, Milling Stone, Intermediate, and Late Prehistoric. The Early Man - Horizon I period (ca. 10,000 to 6000 BCE) is represented by numerous pre-8,000 B.C. sites identified along the mainland coast and Channel Islands (Erlandson 1991; Johnson et. al. 2002; Moratto 1984; Rick et. al. 2001). Early Man - Horizon I sites are generally associated with a greater emphasis on hunting than in later periods, though recent data indicates that the economy was a diverse mixture of hunting and gathering, including a significant focus on aquatic resources (Wallace 1978; Jones et. al. 2002; Moratto 1984). The Milling Stone – Horizon II period (ca. 6,000 to 3,000 BCE) is characterized by subsistence strategies centered on collecting plant foods and small animals, including an apparent importance of seed processing suggested by the appearance and abundance of stone grinding implements, namely milling stones and hand stones (Kowta 1969; Byrd and Raab 2007). The Intermediate – Horizon III period (ca. 3,000 BCE to CE 500) is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. A pronounced trend occurred toward greater adaptation to regional or local resources including an increased variety and abundance of fish, land mammals, and sea mammals along the coast (Warren 1968; Rogers, D. 1929; Moriarty 1966; Rogers, M. 1939, 1945). Tool kits for hunting, fishing, and processing food and other resources reflect this increased diversity, with larger knives, flake scrapers, shell fishhooks, drill-like implements, and various projectile points being more common than in the preceding period. Mortars and pestles also became more common, indicating an increasing reliance on acorns (Koerper and Drover 1983; Glassow et. al. 1988; True 1993; Glassow 1997). The Late Prehistoric – Horizon IV period (ca. CE 500 to Historic Contact) experienced further increase in the diversity of resource procurement demonstrated by more classes of artifacts, including finely-sharpened projectile points associated with usage of the bow and arrow. Other items include steatite cooking vessels and containers, a variety of bone tools, and personal ornaments made from shell, bone, and stone. This period experienced an increase in population size accompanied by the advent of larger, more permanent villages (Wallace 1955, 1978; Drover 1971, 1975; Meighan 1954).

3.2 Ethnography

The project lies within an area traditionally occupied by the Native American group known as the Gabrieleño (or Gabrieliño or Gabrielino). The name Gabrieleño was applied by the Spanish to those natives that were attached to Mission San Gabriel (Bean and Smith 1978; Kroeber 1925). Today, most contemporary Gabrieleño prefer to identify themselves as Tongva (King 1994); however, one contemporary group, the Gabrieleño Band of Mission Indians – Kizh Nation, prefer the term “Kizh.” Gabrieleño territory included the Los Angeles basin and southern Channel Islands as well as the coast from Aliso Creek in the south to Topanga Creek in the north. The Gabrieleño language belongs

to the Takic branch of the Uto-Aztecan language family, which can be traced to the Great Basin region (Heizer 1978; Shipley 1978).

The Gabrieleño established large permanent villages and smaller satellite camps throughout their territory. Society was organized along patrilineal non-localized clans, a common Takic pattern. Gabrieleño subsistence was oriented around acorns supplemented by roots, leaves, seeds, and fruits from a wide variety of plants. Meat sources included large and small mammals, freshwater and saltwater fish, shellfish, birds, reptiles, and insects. Gabrieleño employed a wide variety of tools and implements to gather and hunt food (Blackburn 1963; Kroeber 1925; McCawley 1996). The digging stick, bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks were common tools. The Gabrieleño made oceangoing plank canoes(known as ti'at) capable of holding 6 to 14 people that they used for fishing, travel, and tradebetween the mainland and the Channel Islands.

3.3 Historic Context

Post-Contact history for the State of California is generally divided into three periods: the Spanish Period (1769 to 1822), Mexican Period (1822 to 1848), and American Period (1848 to present).

Spanish exploration of California began when Juan Rodriguez Cabrillo led the first European expedition into the region in 1542. For more than 200 years after his initial expedition, Spanish, Portuguese, British, and Russian explorers sailed the California coast and made limited inland expeditions, but they did not establish permanent settlements. In 1769, Captain Gaspar de Portolá led an expedition composed of soldiers, missionaries, Native Americans from Baja California, and Mexican civilians into what was then known as Alta California. The Spanish Period in California begins in 1769 with the establishment of first Spanish settlements at the presidio of San Diego (a military outpost) and Mission San Diego Alcalá, the first of 21 missions constructed between 1769 and 1823. The expedition proceeded north and reached the present-day boundaries of Los Angeles two months later. On September 8, 1771, Fathers Pedro Benito Cambón and Angel Fernandez Somera y Balbuena established the Mission San Gabriel Arcángel east of present-day downtown Los Angeles (Kyle 2002). In addition to Mission San Gabriel, the Spanish also established a pueblo (town) known as El Pueblo de la Reina de los Angeles de la Porciúncula in the Los Angeles Basin in 1781 (Rice et al. 2012). This was one of only three pueblos established in Alta California and eventually became the city of Los Angeles. The Spanish crown also began to make land grants permitting soldiers and other prominent citizens to establish ranchos during this period. To manage and expand their herds of cattle on these large ranchos, colonists enlisted the labor of the surrounding Native American population. Native populations were also negatively affected by the mission system, which was put in place to govern them as well as convert them to Christianity. The increased European presence during this period led to the spread of diseases foreign to the Native Americans, contributing to the devastation of their population.

The Mexican Period commenced when news of the success of the Mexican War of Independence (1810 to 1821) against the Spanish crown reached California in 1822. The federalization and distribution of mission lands in California occurred during this period with the passage of the Secularization Act of 1833. This Act enabled Mexican governors in California to distribute former mission lands to individuals in the form of land grants. Successive Mexican governors made more than 700 land grants between 1834 and 1846, putting most of the state's lands into private ownership for the first time (Rice et al. 2012). During the supremacy of the ranchos, landowners largely focused on the cattle industry and devoted large tracts to grazing. The land within which the

project site is located was once part of Rancho El Rodeo de las Aguas, initially claimed in 1822 by Mexican settlers Maria Rita Valdez Villa and her husband Vicente Valdez, a Spanish soldier.

The American Period officially began with the signing of the Treaty of Guadalupe Hidalgo in 1848, which ended the Mexican-American War and made California a territory of the United States. California was made a state with the Compromise of 1850 (Waugh 2003). The Gold Rush began in 1848, resulting in an influx of people to California seeking gold. Cattle were no longer desired mainly for their hides but were also important for their meat and other by-products. Eventually, the cattle boom ended, and severe drought years reduced the productivity of the ranchos (Cleland 2005). Many ranchos in Los Angeles County were sold or otherwise acquired by Americans in the mid-1800s, and most were subdivided into agricultural parcels or towns. The county of Los Angeles was established on February 18, 1850, and the city of Los Angeles incorporated two months later. By 1876, the County had a population of 30,000 (Dumke 1944).

3.3.1 Beverly Hills

The City of Beverly Hills is situated on the former rancho lands of the 4,449-acre El Rodeo de las Aguas, initially claimed in 1822 by Mexican settlers Maria Rita Valdez Villa and husband Vicente Valdez, a Spanish soldier. Maria Rita, an Afro-Latina, built an adobe ranch house near the present-day intersection of Sunset Boulevard and Alpine Drive and raised cattle and horses on the land. In 1854, Maria Rita sold the rancho to Benjamin D. Wilson and Henry Hancock for $4,000 (Johnson Heumann Research Associates 1986; Wanamaker 2005).

The rancho changed ownership multiple times through the late 1800s due to a series of failed subdivision attempts by land speculators. By 1906, the rancho was under the ownership of oil investor Burton Green with several partners. After locating water instead of oil, the partners reorganized the former rancho lands as the Rodeo Land and Water Company and began development of a new community. Green later named the town Beverly Hills, in honor of Beverly Farms, Massachusetts (Wanamaker 2006).

Landscape architect Wilbur Cook was hired to help design the new town. An apprentice of Frederick Law Olmstead, Cook designed the town to include wide, curvilinear streets and Santa Monica Park, which spanned three blocks. The first streets were Rodeo, Canon, Crescent, Carmelita, Elevado and Lomitas, all constructed in 1907 (City of Beverly Hills 2012; Johnson Heumann Research Associates 1986).

Following construction of the Beverly Hills Hotel in 1912, the community quickly drew the attention of Hollywood, attracting a cadre of film celebrities including Douglas Fairbanks, Mary Pickford, Charlie Chaplin, Buster Keaton, Marion Davies and Rudolph Valentino. The Speedway, a wooden racetrack, was constructed in 1920 just south of and parallel to Wilshire Boulevard (Johnson Heumann Research Associates 1986).

From 1920 to 1930, Beverly Hills expanded from a city of 700 to 17,000 residents and became the preferred community of the region's wealthy and elite, over Hollywood and the city of Los Angeles' Wilshire district (Longstreth 1998; Wanamaker 2005).

Beverly Hills continued to expand and flourish in the post-World War II period. The city's reputation as a destination for the glamorous and wealthy has continued over the decades though the addition of luxury retailers and the images projected by countless films and television programs. Today, the city has a population of 34,000 (City of Beverly Hills 2012).

Wilshire Boulevard Commercial Development

The early commercial development of Beverly Hills was carefully controlled within a 20-square block known as the triangle, which was designed to prevent commercial sprawl that could diminish the character of the city. Located between Santa Monica Boulevard to the north, Rexford Drive to the east, and Wilshire Boulevard to the southwest, nearly all of the city's earliest shops and businesses were situated within this district. Businesses in the triangle catered to the needs of local residents and included grocers, auto repair garages, and fine clothing and furniture retailers. A handful of local architects were responsible for constructing most of the early buildings within the triangle, designed in period revival-styles including Spanish Colonial, Tudor, Mediterranean, and French Revival. The buildings were typically small in scale and height and were frequently altered or reconstructed over the decades to suit the changing tastes of residents and property owners (Johnson Heumann Research Associates 1986; Longstreth 1998; English and Lee 2006).

Commercial development expanded beyond the triangle during the 1920s real estate boom, particularly along Wilshire Boulevard to the eastern city limits. As the automobile replaced the streetcar as the primary mode of transportation, Wilshire Boulevard became a critical artery in the network of roads through the city of Los Angeles, prompting new development along the corridor. By the mid-1920s, Wilshire Boulevard had become one of the most heavily traveled streets through the cities of Los Angeles and Beverly Hills and points west (ARG 2015).

With the exception of several notable developments along Wilshire Boulevard including the Beverly-Wilshire Hotel, most of the commercial development during this period was modest in scale and catered to commuters rather than local clientele. Shops were largely one- and two-story structures designed in revival and vernacular styles and featured ample rear or side parking lots (Johnson Heumann Research Associates 1986). Businesses noted along Wilshire Boulevard through the 1920s included cafes, auto dealers, markets, and garages (City of Beverly Hills Chamber of Commerce, var.).

The City of Beverly Hills contained nearly 300 commercial buildings by the 1930s (Johnson Heumann Research Associates 1986). At this time, Wilshire Boulevard served as the most direct east-west route through the city of Los Angeles, spanning from downtown to the Pacific Ocean. Wilshire Boulevard offered Angelinos an alternative to shopping downtown. Its new hotels, restaurants, department stores and other commercial establishments made the boulevard a trendy and sophisticated district that lured customers from different parts of the area. The focus on the motorist was reflected in the architectural design of the buildings along the boulevard: large display windows, projecting signs and other elements that were highly visible to drivers served to advertise commercial establishments' merchandise. In historian Kevin Roderick's words, Wilshire Boulevard became the showcase drive of the Automobile Age (Roderick and Lynxwiler 2005).

Commercial development along Wilshire Boulevard in Beverly Hills shifted away from small-scale, commuter-friendly necessities towards larger and grander developments that reflected the city's wealth and affluence. Many of the nation's most reputable department stores, including furniture retailer W.& J. Sloane and the first west-coast branch of Saks Fifth Avenue, were established along Wilshire Boulevard because it was the only commercial area with sufficient-sized parcels to accommodate the necessary amenities. The simple Revival-style neighborhood shops gave way to elegantly designed structures, constructed in Regency, Art Deco, and Streamline Moderne styles. By the 1940s, Wilshire Boulevard was bustling with motion picture theaters, banks, and high-end retailers designed by renowned architects that reflected the growing affluence of the community (Longstreth 1998; Johnson Heumann Research Associates 1986).

A pioneering aspect of the boulevard is that it served as the city of Los Angeles's first linear downtown, a departure from the familiar form of a compact business section in the old city center. While the downtown streetcar system had been utilized by Angelinos for years, many people began to prefer driving their automobiles along the boulevard for shopping and also preferred living among more open spaces closer to the boulevard (Roderick and Lynxwiler 2005).

During the post-World War II period (1945 to 1990), an impressive collection of medium- to large-scale commercial office buildings was constructed within Beverly Hills, primarily along Wilshire Boulevard. These buildings were designed predominately by architects offering a wide range of modernistic architectural interpretations, including International, Corporate Modern, Late Modern, and Post Modern (English and Lee 2006). The shift from low-scale brick and stucco buildings towards larger-massed, high-rise structures constructed of glass, steel and concrete marked a shift in the character of Wilshire Boulevard, a trend that continues today. Architects responsible for a number of these modern commercial improvements included William Pereira, Charles Luckman, Maxwell Starkman, I.M. Pei, Victor Gruen Associates, Welton Becket and Associates, Langdon and Wilson, Edward Durrell Stone, Palmer and Krisel, Anthony Lumsden, Sidney Eisenshtat, and Gin Wong Associates (English and Lee 2006).

3.3.2 Mid-Century Modern Architecture (1945-1965)

Historic-era buildings within the project site feature elements of Mid-Century Modern-style architecture. The Mid-Century Modern style was most commonly applied to commercial buildings constructed in Beverly Hills as elsewhere in the nation between 1945 and 1965. Although it emerged from earlier iterations of the Modern movement, the Mid-Century Modern style and later interpretations of the International style were not fully embraced by the public until after World War II. The style incorporated industrial materials and modern engineering techniques that were developed during the war years. Design elements generally included glass curtain walls, large expanses of ribboned windows, cantilevered roofs, exposed concrete and steel structural elements, and tile and terracotta siding, vertical corrugated siding or stacked roman brick cladding. New technology and materials such as plastic laminates, anodized metal sheaths, and spandrel glass were incorporated in Mid-Century Modern buildings. The style did not fall neatly into any category because many of the architects who practiced within the Modernist theory used a broad range of design elements. The Mid-Century Modern style reflected the emerging philosophy of indoor-outdoor living. Design of commercial properties demonstrated this shift by constructing buildings with open plazas, which represented a major departure from the previous standard of lot line development.

Character Defining Features of the Mid-Century Modern style include:

- Rectangular or gently curving forms
- Concrete, steel, and glass construction materials
- Use of glass curtain walls, reflective or tinted (solar)
- Flat roofs, either with flush eaves or cantilevered slabs
- Horizontal bands of flush, metal-framed windows, or curtain walls
- Lack of applied ornament
- Brick, stone, tile, or terra cotta veneer often used as primary accent material
- Integral parking lot, either subterranean or above-grade
- Landscaped plaza or integral plantings at ground floor

3.3.3 Conrad Hilton

The subject property is associated with Conrad Hilton, the renowned hotelier and developer of the Hilton Hotel Corporation and Hilton International, and with the company's importance in embodying American ideals internationally during the post-war period of the 1950s and 1960s. The significance of Conrad Hilton is also tied closely to the primary architect of his hotels, Welton Becket. The following historic context derived from the Cultural Resources Technical Report prepared as part of the Beverly Hilton Specific Plan is presented to establish a background for the historical significance of Conrad Hilton (Jones & Stokes 2007a). Similarly, the Hilton Office Building, located at 9990 Santa Monica Boulevard is a Beverly Hills Landmark significant for, among other things, its association with Conrad Hilton.

> Welton Becket (1902–1969) and Conrad Hilton (1887–1979) were contemporaries. Conrad Hilton is considered one of the 20th century's best-known and most innovative hoteliers. He is of national, if not global, stature in this context. Both Hilton and Becket ensured that they ran very profitable firms geared to accommodating the changing needs of their respective disciplines.
>
> Both organizations were global in outlook. Becket's firm was one of the nation's most successful architectural firms in the mid-20th century, employing hundreds of people, with corporate offices in San Francisco, Chicago, Houston, and New York in addition to the head office in Los Angeles. At the time of Becket's death in 1969, his architectural firm was the largest in the world. In 1987, his firm was acquired by Ellerbe Associates, and the merged firm continues in operation today as Ellerbe Becket.
>
> Both Becket and Hilton were ambitious men who circulated in the same country club and entertainment circles in Beverly Hills and Los Angeles society, developing a friendship that furthered them and their firms professionally and that raised the stature of Hilton hotels. They both developed business methods (analyzing and quantifying both needs and responses to them to maximize efficiencies) to accommodate a new age, epitomized by the new jet-setting American business client and corporate executive. These parallel approaches converged at the Beverly Hilton, a pioneer in hotel architecture in which cunning economies permitted both lower room rates and a high standard of luxury. In being alert and aggressive in exploiting new technologies and methods, often facilitated by Southern California's leadership in aircraft and related industries, Welton Becket often demonstrated the radical attributes of the "early adopter," simultaneously sustaining close ties to relatively conservative corporate clients.
>
> Conrad Hilton is renowned for not only developing the Hilton empire of hotels but also for his savvy investment style that surmounted apparent high risk. For example, when he was broke (having just opened the El Paso Hilton in 1930, when the Great Depression gained full force), he threw a party for 1,200 people who, he said, badly needed to celebrate. At that gathering he stated, "Publicly, and as often as I could I stated my faith in America … the Golden Land … the Land of Opportunity. This 'thing' [the Depression] couldn't last." He went on to buy the Sir Francis Drake Hotel in San Francisco, the Plaza and the Waldorf-Astoria in New York, the Palmer House in Chicago, the Mayflower in Washington, D.C., and the entire Statler hotel chain, the grande dame of deluxe hotels.
>
> Conrad Hilton and his family lived high-profile lives. He married Zsa Gabor; his son married Elizabeth Taylor. But when he traveled to Europe, he bought no hotels. He preferred to build his own using his acumen in hoteliery, real estate, and efficiency. Hilton wrote, "each of our hotels is a little America, not as a symbol of bristling power, but as a friendly center where men of

> many nations and of good will may speak the language of peace. The Hilton house flag is one small flag of freedom which is being waved defiantly against Communism … with humility we submit this international effort of ours as a contribution to world peace." President Dwight ("Ike") and Mrs. Mamie Eisenhower were close friends of Hilton. Becket's first commission for the hotelier, who lived not far away from his hotel in Bel Air, was the corporation's administration building. His firm eventually designed many hotels for Conrad Hilton, not only because of the firm's design skills but also because of the vision and assumptions shared by Becket and Hilton.
>
> Trader Vic's played an important role in creating the allure of Los Angeles. According to one of the chain's longest serving executives and former C.E.O. Hans Richter, Vic 'The Trader' Bergeron and Conrad Hilton formed a friendship beginning around 1945, when Trader Vic's restaurants were attaining fame for prescient "fusion" fare. Up to that time, hotel restaurants were not that individually distinguished. Hilton approached Bergeron, and they agreed as part of a master franchise that Trader Vic's would be located in three Hilton hotels: the extant Chicago and Washington Hiltons, as well as the unbuilt Beverly Hilton. In subsequent decades, Trader Vic's were established in many Hiltons nationally and internationally, also including Dallas, Havana and London. The South Seas-themed restaurant at The Beverly Hilton was designed specifically for the site by Welton Becket and Associates in consultation with Trader Vic's, and it became a destination for the community as well as celebrities. These leaders included major manufacturers such as Howard Hughes and steel magnate Earle Jorgensen, and actors and entertainment figures such as Robert Stack, Art Linkletter, Walter Pigeon, Ronald Reagan, and Walt Disney among many others. Sunday evenings were often when these people came together, Hilton and Becket among them. "Real thinkers, real dreamers, people who would talk about really interesting, exciting things, and among them all they developed these hotels, inspired each other … they grew from each other." Because The Beverly Hilton hosted the annual Golden Globe Awards and other industry and political events, the restaurant has continued to be part of Hollywood legend and California politics.

In 2013, a City Landmark Assessment and Evaluation Report determined that the Hilton Office Building, located at 9990 Santa Monica Boulevard, meets the City of Beverly Hills' criteria for designation as a local landmark. The report stated that that the Hilton Office Building is significant for several reasons, including that it was built and utilized by Conrad Hilton for more than 10 years as his office and the location of the Hilton company's headquarters. The Hilton Office Building was designated a local landmark on February 20, 2013.

3.3.4 Welton Becket

The Beverly Hilton property was designed by the famed firm of Welton Becket and Associates and is an important example of Becket's influence on Mid-Century Modern architecture. The following historic context, derived from the Cultural Resources Technical Report prepared as part of the Beverly Hilton Specific Plan (Jones and & Stokes 2007a), is presented to establish the significance of the property under its association with Welton Becket:

> Welton Becket and Associates, 1949–1988, designed six of the 17 signature post–World War II Hilton International hotels built between 1949 and 1966, including the Baghdad Hilton, Beirut Hilton, Hilton Havana, Hilton Hawaiian Village, Manila Hilton, and the Nile Hilton, and executed schematic designs for many more.

At a regional level in Southern California, Becket's firms at which he worked as partner and principal are responsible for what are now landmark buildings that defined Southern California on its own terms. Though later Welton Becket and Associates became known as one of the most successful executors of a freely interpreted, more whimsical Modernism, as Walter Wurdeman's partner in Wurdeman and Becket (1933–49) the firm developed the concept of 'total design', meaning that their firm assumed responsibility for master planning, engineering, interiors, furniture, fixtures, landscaping, signage menus, silverware, matchbooks, napkins, brochures and any ancillary graphics.

Wurdeman and Becket's commissions include:

- The Pan Pacific Auditorium, city of Los Angeles, 1935, a building that resembled a reconfigured ocean liner with four striking "smokestacks" or fins. Though it burned down in 1989, it is recalled as one of the finest examples of Streamline Moderne style in the nation.
- Bullock's Pasadena, Pasadena, 1947, listed on the National and California registers
- The General Petroleum Company Building, city of Los Angeles, 1949, listed on the National and California registers
- Welton Becket and Associates' commissions include:
    - Capitol Records tower, city of Los Angeles, 1954, determined eligible for the National Register/listed on the California Register
    - Santa Monica Civic Auditorium, Santa Monica, 1958
    - Century City Master Plan/Development, city of Los Angeles, 1958–1962
    - Memorial Sports Arena, city of Los Angeles, 1959
    - Los Angeles International Airport Theme Building, city of Los Angeles, 1962, with Pereira & Luckman and Paul R. Williams
    - The Cinerama Dome, the world's first concrete geodesic dome, city of Los Angeles, 1964
    - The Los Angeles Music Center, (including the Dorothy Chandler Pavilion), city of Los Angeles, 1964
    - UCLA Master Plan, city of Los Angeles, 1965; Becket served as master planner and supervising architect from 1948–1968, designing the Medical Center and Pauley Pavilion
    - The Federal Office Building, city of Los Angeles, 1966, with Paul R. Williams and A.C. Martin & Associates

In addition to the firm's renown for breadth of style, culminating in mid-century Modernism, Becket was also known for a progressive approach to construction methods. To cite one example of Becket's approach, Oakland's curved aluminum-and-glass clad Henry J. Kaiser Building, 1960, was considered by contemporary critics to be of outstanding beauty, simultaneously acting as a giant billboard marketing aluminum and as one of the city's architectural highlights. The structure was prescient and progressive, revealing Becket's skill with new materials and in executing new ideas. It featured a rooftop garden to conceal and insulate the parking structure, radiant heating, and fire cladding for steel that eschewed asbestos in favor of cement and ground-up seashells. The thin profile of the building ensured natural daylight for interiors, reducing energy costs and enhancing worker productivity. Becket's progressive approach to construction was also manifest in The Beverly Hilton.

The architecture of The Beverly Hilton embodies a response to the end of World War II and to the Great Depression preceding it. It was intended to replace architecture associated with the

'long, cold and grey time' with a fresh design that spoke optimistically and with a sense of "exuberance—it was a new world that had become sunny again—the cars had these funny shapes but they weren't black anymore."

The Beverly Hilton was promoted as 'the queen of the Hilton Empire … the most beautiful hotel on earth.' As a contemporary Los Angeles Times article noted, 'In achieving his Beverly Hilton design, Becket did not pattern his work after previous hotels … Becket aimed to establish, rather than to follow, a pattern. Thus, The Beverly Hilton derives from no previous style though it could quite conceivably set some.'

As rendered by Welton Becket and Associates, the strongly horizontal Beverly Hilton embodies the distinctive characteristics of mid-century American modernism within the framework of American and international hoteliery. It redefined concepts of luxury and service. Luxury was now on a new American, not old European, footing. As the hotel's current public relations site notes, for example, "The management team even went so far as to scientifically test the acoustics of guestroom wall construction, hiring UCLA scientists to measure the partition between every room electronically for complete soundproof assurance." In addition, to further ensure guests received an excellent night of sleep, the Hilton executive team tested mattresses in their homes before they were approved. Sleeping soundly and well was not only necessary for a business guest demanding luxury but a phenomenon that could be scientifically analyzed by the architect and confirmed by experience by the hotelier, a standard that exemplified the close teamwork of the Becket and Hilton firms.

3.3.5 Gin Dan Wong, FAIA

Gin Dan Wong (1922-2017), FAIA, was responsible for a major renovation of Wilshire Tower in 1989 that changed many of the interior public spaces and entry court. He was a Chinese-born architect who immigrated to Los Angeles as a child. He served in the United States Army during World War II and subsequently studied at the University of Southern California (USC) School of Architecture. After graduating in 1950, Wong went to work for the well-known firm of Pereira and Luckman, eventually becoming the vice president of design. In 1958, Wong helped found the firm of William L. Pereira & Associates, becoming a partner and president of the firm. Wong established his own firm, Gin Wong Associates (GWA) in 1974, which was known internationally until its closure in 2015. The firm specialized in the design and planning of corporate headquarters, commercial and retail spaces, hotels, educational facilities, and university campuses (Los Angeles Conservancy 2016).

Wong was part of a small group of Chinese-American architects that made significant contributions to the post-war architectural landscape of the Los Angeles area. He served as the director of design for the three architectural firms that partnered on the Los Angeles International Airport (LAX) construction project in 1960: Pereira & Luckman and Associates, Welton Becket and Associates, and Paul R. Williams. During this time, Wong worked on the design of the futuristic LAX Theme Building (1961). His other best known local works include: the CBS Television City building (1952), the Union Oil Center (aka Los Angeles Center Studios) (1958), the Union 76 gas station in Beverly Hills (1965), the Arco Tower (1989), and in association with Philip Johnson, the Crystal Cathedral's Crean Tower and Family Life Center building (1990).

Wong is known to have built a number of projects in the City of Beverly Hills and is considered a Master Architect in the City. His contributions in Beverly Hills include at least one residence on Maple Drive (address unknown), a mixed-use building at 9242 Beverly Boulevard (1989), a bank at 8485 Wilshire Boulevard (1979, demolished), an office complex at 9336-9346 Civic Center Drive

(1985), and a multi-story, stepped profile office building at 100 North Crescent Drive (Gin Wong Associates 2013; Los Angeles Conservancy 2016; Hasanovic 2006; Orange County Catholic 2016; Green 1984; Finke 2011).

Throughout his long career, Wong's design aesthetic slowly transitioned away from his classically Modern origins expressed while at his earlier firms towards a style that reflected a stronger influence from the Corporate Modern and Postmodern styles. This shift is evident in many of his designs completed from 1972 to 2016, as evidenced by a number of common themes, including the use of bronze solar and reflective glass curtain walls; use of concrete, steel and stone as cladding; use of rectangular, cylindrical and pyramidal forms and planes; use of recessed walls and notched corners; and landscaping influences of atriums or rooftop gardens. Additionally, he designed several high-rise offices during the late 1980s with hexagonal forms. This building shape was chosen as a way to maximize the number of corner offices in the buildings.

Wong was made a Fellow of the American Institute of Architects (AIA) in 1966, an honor conferred upon a member of the AIA who has notably contributed to the advancement of the profession in design, construction, literature, education or public service (American Institute of Architects 2017). He retired and closed his firm, GWA, in 2015 (Sandomir 2017).

Wong died September 1, 2017 at his home in Beverly Hills (*Los Angeles Times* 2017). Wong's contributions to the broad architectural landscape of the Los Angeles area have been widely acknowledged, and since his passing, more commentary and analysis has been written about his work. However, he is still known best for his Mid-Century Modern designs, and his later work with GWA is just beginning to be considered and appreciated. Architectural historian Trudi Sandmeier, director of graduate programs in heritage conservation at Wong's alma mater, the University of Southern California, noted that Wong "had a very refined sense of style in terms of his design aesthetic, and if you look at what he did pre-1970s, he had a clear eye for what he wanted to see" (Sandomir 2017). A comprehensive list of his work at GWA has yet to be completed, and his papers are not yet available for scholarly analysis.

3.3.6 The Los Angeles Country Club

Golf was emerging as a popular sport on the West Coast in the late 19th century, and several clubs were established in Southern California in the late 1890s. The first golf course in the city of Los Angeles was reportedly a private course built by John M. Baldwin at Rancho Los Feliz, in today's Griffith Park. The LACC, originally called The Los Angeles Golf Club, was established in 1897 by Walter Grindlay, Edward B. Tufts, Hugh W. Vail and E. Conde Jones. The club occupied three locations prior to 1904, when The Country Club Realty Company was formed to raise money for purchase of the Wolfskill Ranch, near the area that would later become Beverly Hills, on which a new course would be developed.

In 1906, Beverly Hills was named in honor of LACC member, Burton E. Green, a native of Beverly Farms, Massachusetts. An East Coast landscape architect laid out the curving streets, lots and triangular commercial district that characterize Beverly Hills today. Sales and development began slowly, and Green built the Beverly Hills Hotel in 1912 to help attract interested buyers (Beverly Hills Historical Society, n.d.). The LACC moved in entirety to its current location on Wilshire Boulevard in 1910 and the club's presence contributed in drawing new residents to the then-remote area (Whited 2020).

The property's original 18-hole, 6,496-yard course was designed by board members Sartori, Tufts, Orr and Norman Macbeth, a champion player and golf course designer. A clubhouse was designed

by the prominent local architect and club member Sumner P. Hunt at a cost of $85,000 (LACC 1997). Located one mile away from a new electric trolley stop at Wilshire and Santa Monica boulevards, the LACC's new course and clubhouse opened in 1911 and was described as the best course in Southern California at the time (Windeler 1997). In 1914 the community of Beverly Hills expanded its boundaries enough to meet the minimum number of citizens to incorporate. Although the LACC had been using "Beverly Hills" as its address since moving to the new location, it remained in unincorporated Los Angeles County. In 1916 the city of Los Angeles annexed the area, bringing the LACC officially into the Los Angeles city boundaries.

In 1920, the LACC expanded with the purchase of 118 acres north of and 57 acres south of Wilshire Boulevard (Windeler 1997). In the Spring of 1920, William Herbert Fowler, an English-born golf architect, was hired to draw up models and design two 18-hole courses on the club's property. Fowler was a prolific golf course architect and was involved in the design of numerous courses including the Ambassador Hotel's Rancho Golf Course, a course for the Olympic Club of San Francisco, the Burlingame Country Club course, the Riverside Golf Club, and the Allegheny Country Club in Pennsylvania. The proposed design for LACC included an easier course covering the club's original grounds, and an updated championship course for the newly acquired land north of Wilshire Boulevard. Fowler simply described the courses as "North" and "South" so that others did not feel one course was implied to be superior to the other. The two courses were to be nearly identical in length but the ground over which they were to be played would vary considerably. Fowler advocated planting shrubs and low trees especially on the South Course.

Fowler's design was ultimately implemented by George C. Thomas Jr. Thomas was a Philadelphia native who briefly studied at the University of Pennsylvania and enjoyed horticulture and hybridizing roses. An avid golfer, he started working in an amateur fashion on golf course design in the early 1900s. His family moved to a Beverly Hills estate in 1919 and he subsequently became responsible for carrying out Fowler's master plan for the North and South courses between 1920-1921. Thomas worked on numerous golf courses including Griffith Park, the Bel-Air Country Club, Riviera Country Club, the La Cumbre Country Club in Santa Barbara, and the Ojai Valley Inn. Although not entirely complete, the new courses opened for play in June 1921, with a formal opening in August of that year. The 6,445-yard, par-71 North Course acquired a reputation of being somewhat difficult (Windeler 1997).

Thomas was again commissioned by LACC to refurbish the North Course, which LACC records show cost approximately $50,000. Between 1927 and 1928 Thomas modified the North Course by entirely rebuilding hole No. 17 and redesigning others including Nos. 6, 10, 15, 16 and 18. Thomas collaborated with William (Billy) Bell, who supervised the construction and was tasked with modifying the bunkers. The Thomas and Bell design is noteworthy for the manner in which they worked with the natural topography of the land, the ability to play the holes in different manners due to the arrangement of several tees to each green, and the course's unique bunkers which are not typical ovals with smooth edges, rather they have been compared to baseball mitts for their finger-like edges rimmed with rough grass (Wharton 2015). As Thomas was preparing to redesign the South Course in 1932, he died of a heart attack. The South Course greens were still refurbished that year.

The LACC began a master planning process in 1995 to restore the North Course, as designed by Fowler and implemented by Thomas in 1920. The intent was not to replicate the course's 1921 form but rather to incorporate the character of the original course into the current design. Construction on the North Course began in 1996. Considerable work also occurred on the South Course between 1996 and 1997; all greens were renovated to meet USGA specifications, including 18 new greens

and about 50 bunkers. The bunkers were said to have been restored to their original forms and character, but the bunker shaping was not as severe in form as on the North Course to in order to maintain playability.

In 2006, the LACC began interviewing architects to refurbish the North Course, which resulted in the selection of Gil Hanse, who proposed to restore the George C. Thomas Jr. and Billy Bell design from 1928. Thomas and Bell's course design was known for some unique elements – Thomas was said to prefer a more natural look, and the bunkers he and Bell created were not typical ovals with smooth edges, rather, they appeared like baseball mitts with fingers, and were rimmed by shaggy fescue. In his greens, Thomas often used distinctive peninsulas and wings to allow for varied pin placement. Hanse worked with golf historian Geoff Shackelford to study archival documents, and performed investigative work on the LACC property, in order to complete the restoration work. This began with restoring the bunkers, which was completed in 2010. The club membership approved additional work, and Hanse continued the North Course restoration. Hanse also refurbished the South Course with a new, contemporary design in 2015 (Wharton 2015; MoeGolf 2016; Jones 2020; Hanse Golf Design, n.d.).

4 Methods

4.1 California Historical Resources Information System

Rincon conducted a search of the CHRIS at the SCCIC on September 4, 2020. The purpose of the search was to identify previously recorded cultural resources and previously conducted cultural resources studies that have taken place within a 0.25-mile radius of the project site (search radius). The CHRIS search identified 16 previously recorded cultural resources within the search radius, all of which are built environment resources. Of the 16 previously recorded resources, one, the Beverly Hilton Hotel (P-19-186682), is within the project site. All previously recorded resources identified by the CHRIS search are detailed in Table 4.

The CHRIS search identified 21 previously conducted cultural resources studies within the search radius, one of which (LA-06133) included a portion of the project site and resulted in the recordation and evaluation of the Beverly Hilton Hotel (P-19-186682). All previously conducted studies identified by the CHRIS searches are detailed in Table 5. Appendix A includes additional documentation related to the CHRIS searches.

Table 4 Previously Recorded Cultural Resources within a 0.25-mile radius of the Project Site

Primary Number	Resource Type	Description	Recorder(s) and Year(s)	Relationship to Project Site
P-19-150387	Historic Building	La Dolce Vita	J, Snyder, Caltrans, 1993	Outside
P-19-150388	Historic Building	9731-9751 Santa Monica Blvd	J, Snyder, Caltrans, 1993	Outside
P-19-150389	Historic Building	9701-9725 Santa Monica Blvd	J, Snyder, Caltrans, 1993	Outside
P-19-150390	Historic Building	9683-9689 Santa Monica Blvd	J, Snyder, Caltrans, 1993	Outside
P-19-150391	Historic Building	The Gap	J, Snyder, Caltrans, 1993	Outside
P-19-177098	Historic Building	El Rodeo School	C. Widell, 1994	Adjacent
P-19-177101	Historic Building	Beverly Hills High School	1994/2010/Pam Daly, Cogstone, 2011	Outside
P-19-177102	Historic District	Beverly Hills Unified School District	C. McAvoy and L. Heumann 1986	Outside
P-19-177327	Historic District	Beverly Gardens Park District	M. Lortie, 1985	Adjacent
P-19-186682	Historic Building	Beverly Hilton Hotel	N. Wallock, LSA, 2001	**Within**
P-19-189270	Historic Building	Perpetual Savings Plaza	URS, 2010	Outside

Primary Number	Resource Type	Description	Recorder(s) and Year(s)	Relationship to Project Site
P-19-189799	Historic Structure	ELO459-4 Light Pole	Shannon Loftus, Ace Environmental, 2011	Outside
P-19-189840	Historic Structure	EL0459-10 Light Pole	Shannon Loftus, Ace Environmental, 2011	Outside
P-19-189949	Historic Building	Coamerica Tower	Shannon Loftus, Ace Environmental, 2011	Outside
P-19-190775	Historic Building	9301 Wilshire Boulevard	K.A. Crawford, 2011	Outside
P-19-190666	Historic Building	Beverly-Linden Medical Office Building	K.A. Crawford, 2011	Outside
P-19-190936	Historic Building	T-Mobile West LLC SV12838B	K.A. Crawford, 2011	Outside

Source: South Central Coastal Information Center 2018; 2020

Table 5 Previously Conducted Cultural Resources Studies within a 0.25-mile Radius of the Project Site

Report Number	Author	Year	Title	Location	Relationship to Project Site
LA-01968	Bissell, Ronald M.	1989	*Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los Angeles, Los Angeles County, California*	Along Santa Monica Boulevard and Wilshire Boulevard	Adjacent
LA-03678	Anonymous	N/A	*Request for Determination of Eligibility for Inclusion in the National Register of Historic Places*	Beverly Gardens Park	Adjacent
LA-03679	Anonymous	N/A	*Request for Determination of Eligibility for Inclusion in the National Register of Historic Place*	Beverly Gardens Park	Adjacent
LA-03680	Anonymous	N/A	*Request for Determination of Eligibility for Inclusion in the National Register of Historic Places*	Beverly Gardens Park	Adjacent
LA-03765	Casen, George	N/A	*Historic Property Survey 07 La 02 P.m. 3.65/9.57 Route 405 to Fairfax Avenue Los Angeles County California 07204-051280*	Near 9950 South Santa Monica Boulevard	Adjacent
LA-05013	Gray, Deborah	1991	*Cultural Resource Assessment for the AT&T Wireless Services Facility Number C310.2, County of Los Angeles, Ca*	Near 9930 South Santa Monica Boulevard	Outside

Report Number	Author	Year	Title	Location	Relationship to Project Site
LA-05189	Holson, John	2001	*Archaeological Survey and Record Search for Worldcom 1901 Avenue of the Stars, Century City Loop Project*	1901 Avenue of the Stars	Outside
LA-06133	Duke, Curt	2002	*Revised Cultural Resource Assessment Cingular Wireless Facility No. Sm 152-01 Los Angeles County, California*	On-site	**Within**
LA-09675	Michael Brandman Associates	2008	*Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC, Candidate LAC310 (Santa Monica/Wilshire), 9949 Santa Monica Boulevard, Beverly Hills, Los Angeles County, California*	9949 Santa Monica Boulevard	Outside
LA-11005	Unknown	2010	*Westside Subway Extension Historic Property Survey Report and Cultural Resources Technical Report*	Along Santa Monica Boulevard and Wilshire Boulevard	Adjacent
LA-11366	Loftus, Shannon	2011	*Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment, AT&T Site: EL0459-4, 700 Walden Drive, Beverly Hills, Los Angeles County, California 90210 CASPR# 3551016879*	700 Walden Drive	Outside
LA-11443	Loftus, Shannon	2011	*Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment. AT&T Site: EL0459-10. 211 South Spalding Drive, Beverly Hills, Los Angeles County, California 90210. CASPR# 3551016879*	211 South Spalding Drive	Outside
LA-11574	Bonner, Wayne	2011	*Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Facility LAC681-01, USID 11934 (Santa Monica/Wilshire), 9777 Wilshire Boulevard, Beverly Hills, Los Angeles County, California*	9777 Wilshire Boulevard	Outside
LA-11642	Daly, Pam and Nancy Sikes	2012	*Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports*	Along Santa Monica Boulevard and Wilshire Boulevard	Adjacent/ Extending Outside
LA-11785	Rogers, Leslie	2012	*Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension*	Along Santa Monica Boulevard and Wilshire Boulevard	Adjacent/ Extending Outside

Report Number	Author	Year	Title	Location	Relationship to Project Site
LA-12113	Bonner, Wayne and MBA Crawford, Kathleen	2012	*Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV00283A (LA283 Beverly Hills Triangle Med), 9725 Wilshire Boulevard, Beverly Hills, Los Angeles County, California*	9725 Wilshire Boulevard	Outside
LA-12371	Bonner, Wayne and MBA Crawford, Kathleen	2013	*Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAC310 (Santa Monica/Wilshire), 9949 Santa Monica Boulevard, Beverly Hills, Los Angeles County, California*	9949 Santa Monica Boulevard	Adjacent
LA-12372	Bonner, Wayne and MBA Crawford, Kathleen	2013	*Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAC310 (Santa Monica/Wilshire), 9949 Santa Monica Boulevard, Beverly Hills, Los Angeles County, California*	9949 Santa Monica Boulevard	Adjacent
LA-12795	Bonner, Wayne and MBA Crawford, Kathleen	2013	*Cultural Resources Records Search and Site Visit Results for T Mobile West, LLC Candidate SV12838B (Beverly Hills Relo) 9740 Wilshire Boulevard, Beverly Hills, Los Angeles County, California*	9740 Wilshire Boulevard	Outside
LA-03525	Chartkoff, Kerry and Joe Chartkoff	1966	*Ucas-092 Route 2 Freeway Los Angeles County West, Los Angeles, Beverly Hills*	Route 2 Freeway	Outside
LA-09675	Bonner, Wayne H. and Kathleen A. Crawford	2008	*Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC, Candidate LAC310 (Santa Monica/Wilshire), 9949 Santa Monica Boulevard, Beverly Hills, Los Angeles County, California.*	9949 Santa Monica Boulevard	Outside

Source: South Central Coastal Information Center 2018; 2020

4.2 Archival and Background Research

The archival and background research methods utilized in support of this study were developed to facilitate CEQA compliance by identifying any cultural resources, including built environment/historical resources and archaeological resources, which could be significantly impacted by the proposed project. Towards that end, Rincon consulted with the City, which as the lead agency under CEQA determined the analysis included in this study should consider potential project impacts to both the project site and properties directly abutting it, specifically the adjacent LACC. The background and archival research methods detailed below were aimed at gathering information on the project site in addition to adjacently located historical resources, specifically, LACC.

Archival and background research for this effort was completed throughout August and September 2020. Research methodology focused on the review of a variety of primary and secondary source

materials relating to the history and development of the project area and its surroundings. Sources included, but were not limited to historical maps, photographs and written histories of the area. A list of sources and repositories consulted for this study is included below.

- Historical aerial photographs accessed digitally via Nationwide Environmental Title Research (NETR) Online, Inc. and the University of California, Santa Barbara Map & Imagery Lab
- Historical photographs of the project area accessed via Calisphere.org
- Historical topographic maps accessed digitally via United States Geologic Survey
- Historical newspaper articles accessed digitally via newspapers.com
- Historical Sanborn Fire Insurance Company maps accessed digitally via the Los Angeles Public Library
- Personal communication with LACC General Manager/COO Michael Beam and club historian, Adrian Whited
- *Links with A Past: The First 100 Years of The Los Angeles Country Club 1897-1997*. Published by LACC

To identify resources that may be impacted by the proposed project and to contextualize the development of the area surrounding the project site, Rincon performed a cultural resource inventory review. The following inventories of cultural resources were referenced to determine if any portion of the project site has been listed as a historical resource. Review of the inventories listed below was negative for any portion of the project site

- National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHR)
- California Points of Historical Interest (PHI) and Landmarks lists,
- Built Environment Resources Directory (BERD) for Los Angeles County
- Beverly Hills Local Register of Historic Properties
- SurveyLA (the city of Los Angeles Historic Resources Survey) findings via historicplacesla.org

4.3 Previous Historical Evaluations

The background research performed for this study indicates two portions of the project site (9900 Wilshire Boulevard and the Beverly Hilton Property) and one property immediately adjacent to the project site (LACC), have been subject to previous historic resources documentation. Research further indicated that the gas station site has not been previously subject to historic resources documentation. A summary of the results of the previous investigations of 9900 Wilshire Boulevard and the Beverly Hilton Property is included below.

9900 Wilshire Boulevard

9900 Wilshire Boulevard was first evaluated in 2005, as part of the environmental review process for the 9900 Wilshire Project. At that time, Architectural Resources Group (ARG) performed a historical evaluation and concluded that the property was eligible for listing in the CRHR under Criterion 1 for its association with decentralization development patterns in Southern California after World War II and under Criterion 3 for the quality of its Mid-Century Modern architectural design (Impact Sciences, Inc. 2007).

The eligibility of 9900 Wilshire Boulevard was again explored in 2007 by Jones & Stokes Associates. The Jones & Stokes evaluation of the property concurred with the previously prepared ARG evaluation, that it was eligible for listing in the CRHR under Criterion 1 for its association with patterns of events that have made a significant contribution to the broad patterns of local history of California, in this case the planning and development of the Los Angeles area in the post-war era. The evaluation additionally found the property eligible for the CRHR under Criterion 3 for its architectural merit as an excellent example of a Mid-Century Modern commercial building in Beverly Hills (Impact Sciences, Inc. 2007).

Beverly Hilton Property

The Beverly Hilton property was first recorded and evaluated on California Department of Parks and Recreation 523 Series forms (DPR forms) in 2001 by Judith Marvin, et al. of LSA Associates as part of the following study: *Cultural Resources Assessment for a Cingular Wireless Facility Project* (P-19-186682). As a result of this initial effort, the property was recommended individually eligible for listing in the NRHP under Criteria A, B, and C.

The Beverly Hilton property was again evaluated in 2006 by HRG in support of the Beverly Hilton Redevelopment/Revitalization Plan, a development plan that would fulfill the Beverly Hilton Specific Plan. HRG recommended the property eligible for the CRHR listing under Criterion 1 for its associations with events that made a significant contribution to California's history and cultural heritage and under Criterion 3 for its architectural significance as a design of Welton Becket. The property was recommended ineligible for NRHP listing due to an overall lack of integrity. This evaluation recommended a period of significance of 1953 through 1966, corresponding with all of the original buildings and features designed by Welton Becket and Associates. Contributing buildings and features included Wilshire Tower (1953-55), the Conference Center/Administrative and Retail Wings (1953-59), and the Swimming Pool Terrace (HRG 2006).

The Beverly Hilton property was successively recorded and evaluated by Jones & Stokes as part of Beverly Hills' citywide historic resources survey of commercial properties, in 2006. This finding concluded that the property retained sufficient integrity to be eligible for the NRHP in addition to the CRHR not only for its significant cultural (Criterion A/1) and architectural (Criterion C/3) associations, but also for its associations with Conrad Hilton (Criterion B/2). Jones & Stokes expanded the documentation behind this finding as part of the City's environmental review of the Beverly Hilton Redevelopment/ Revitalization Plan in 2007 (Jones & Stokes 2007a). At that time, a period of significance of 1953 to 1955, derived using only the property's architectural significance under Criterion C/3 to recognize Becket's original design intent for the property, was recommended. Contributing buildings and features under this period of significance included Wilshire Tower, the Conference Center/Administrative and Retail Wings, and the Swimming Pool. The Parking Garage, Lanai Rooms, and Palm/Oasis Court were not considered contributing buildings at that time.

Most recently, in 2014, HRG completed a HABS record for the property. As previously mentioned, this record was completed as mitigation (MM-CR-1) for impacts to historical resources under the Beverly Hilton Specific Plan. It documented the entire Beverly Hilton property through narrative text and large-format black and white photography of the associated features.

Los Angeles Country Club

The historic significance of the LACC property was explored in 2011 as part of the Westside Subway Extension (WSE) Project by the Los Angeles County Metropolitan Transportation Authority. The WSE Project proposed the construction of a below-grade rail alignment, a portion of which would

traverse beneath the southwestern corner of the LACC property. The evaluation performed for the WSE Project only considered the eligibility of the portion of the LACC property which was above the proposed rail alignment (roughly three acres). The investigation concluded three acres in the southwestern corner of the property appeared eligible for listing in the NRHP and CRHR under Criterion C/3 as a historic landscape that embodies the distinctive characteristics of a professionally designed landscape over 50 years old and it retained sufficient integrity to qualify for listing in the NRHP and CRHR (Daly 2011).

The entirety of the LACC property was successively identified by SurveyLA, a city-wide historic resources survey of the city of Los Angeles, in 2015. The LACC property is not accessible to the public therefore SurveyLA did not perform a formal evaluation of the property. However, the survey results discussed the property's potential historic significance and indicated that it appeared eligible for listing in the NRHP, CRHR and as a City of Los Angeles Historic-Cultural Monument (HCM) under Criteria A/1/1 and C/3/3. The survey indicated the property appeared eligible under Criteria A/1/1 as an excellent example of an early 20th century golf course and country club in the city of Los Angeles which has been in continuous use since 1911. It additionally indicated the property appeared eligible under Criteria C/3/3 as an excellent example of an early 20th century golf course designed by master golf course architects Herbert Fowler and George C. Thomas Jr. (City of Los Angeles 2015).

4.4 Native American Outreach

Rincon contacted the Native American Heritage Commission (NAHC) on July 24, 2020 to request a SLF search of the project site and a 0.25-mile radius surrounding it. The purpose of the SLF search is to identify lands or resources important to Native Americans and to assess the potential for project-related development to impact Native American resources. The NAHC responded on July 27, 2020, stating the SLF search was negative. The NAHC additionally provided the following list of six Native American entities that may have knowledge of cultural resources in the project site and/or its vicinity: Soboba Band of Luiseño Indians, Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Gabrieleño Band of Mission Indians – Kizh Nation.

Rincon performed informal outreach to the six Native American entities included on the NAHC list. Letters were emailed to each of the entities on August 26, 2020. The letters provided a description of the proposed project along with a location map and requests that those with information pertaining to cultural resources in the area of the project site contact Rincon. At the time this report was prepared, no responses to the Native American outreach had been received. This study will be updated at the conclusion of Native American outreach. The informal outreach described above does not constitute consultation under Senate Bill (SB) 18 or Assembly Bill (AB) 52, which was performed by the City. Documentation related to the Native American Outreach that had occurred thus far is included in Appendix B of this study.

4.5 Field Survey

Rincon Cultural Resources Specialist, Alexandra Madsen, MA, performed a survey of the project site and the surrounding area on September 4, 2020. The survey consisted of a visual inspection of all built environment features located within the project site, including the 9900 Wilshire Boulevard site, the Beverly Hilton property and the gas station site. She noted the previously identified

character-defining features of the Beverly Hilton property to assess their overall condition and integrity. She documented the survey using field notes and digital photographs.

In addition to the built environment survey, Ms. Madsen conducted a pedestrian field survey of the 9900 Wilshire Boulevard site. Areas of exposed ground were inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics). Ground disturbances such as burrows and drainages were also visually inspected.

Rincon Architectural Historian, Rachel Perzel, MA, performed a survey of the LACC property on October 16, 2020. Ms. Perzel met with LACC General Manager/COO, Michael Berm. Following a discussion of the history of LACC, Ms. Perzel performed a reconnaissance-level survey of the LACC property. The survey was undertaken by golf cart; Mr. Berm provided a narrative description of various features of the property throughout the survey. Several portions of the property, including that proximately located to the proposed project site, were inspected more intensively. During the survey Ms. Perzel noted the condition, potential character-defining features and integrity of the property and its features. Mr. Berm's knowledge of the historical development of the property was noted and photographs were taken throughout. Because no direct ground disturbing activities are proposed on this property, an archaeological field survey was not completed.

Copies of the field notes and digital photographs from the survey described above are on file with Rincon's Los Angeles office.

5 Results

The project site encompasses 9900 Wilshire Boulevard, the Beverly Hilton property, and the gas station site. The historical significance of all of these properties, in addition to the adjacently located LACC property, were considered as part of the current study (Figure 5).

The gas station site has not been subject to previous historical resource evaluation and a brief discussion of its potential historical significance is presented in Section 5.1. 9900 Wilshire Boulevard and the Beverly Hilton property were previously recorded and evaluated and found to qualify as historical resources for the purposes of CEQA. The site visit conducted for this study indicates that since their last recordation, the building at 9900 Wilshire Boulevard was demolished and the Beverly Hilton property has undergone various alterations. Both resources were recorded and updated on DPR forms as part of the previous study.

A portion of the LACC property was found eligible for listing in the NRHP and CRHR in 2011 and the entirety of the property was identified by SurveyLA as potentially significant in 2015. However, the 2011 evaluation only considered three of the property's over 300-acres and while it was identified as potentially significant in 2015, it was not formally recorded at that time. To ensure any potential indirect project-related impacts to the LACC property were adequately considered, the property was recorded and evaluated on DPR forms as part of the current study to confirm its historical resources eligibility.

DPR forms for 9900 Wilshire Boulevard, the Beverly Hilton property and the LACC property are included in Appendix C of this report and summarized in Sections 5.2, 5.3 and 5.4.

The CHRIS and SLF searches results and Native American outreach completed thus far did not indicate the presence of archaeological resources within or surrounding the project site. The field survey of the 9900 Wilshire Boulevard site identified no evidence of archaeological remains. Ground visibility throughout the site was fair (approximately 60 percent) with some vegetation including dry grass and weeds. The area is characterized by a central deep pit. It is highly disturbed due to past development and the subsequent demolition of structure(s). Modern disturbances include stockpiles of soil and rock debris. No prehistoric cultural resources were identified.

Figure 5 Properties that were Investigated as Part of this Study



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5.1 Gas Station Site

The research conducted for this study indicates that the gas station site has not been previously subject to historic evaluation. A review of aerial imagery suggests that the built environment features located on the gas station site were constructed between 1980 and 1989 (Netronline var.). During the site visit, the gas station site was inspected and it was affirmed that the built environment features on the gas station site appear less than 45 years of age (Figure 6). Additionally, the property's lack of architectural distinction, indicating that it does not meet National Register Criteria Consideration G, was noted. Per the guidance of the California Office of Historic Preservation (OHP) and the NPS (California OHP 1995; NPS 1995), the property was not further considered as a potential historical resource.

Figure 6 Gas Station Site; View Southeast-Facing



5.2 9900 Wilshire Boulevard

Since the time of its most recent evaluation in 2007, the Robinsons-May Site Department Store was demolished (Figure 7). Observed on the site visit, the only built feature remaining at 9900 Wilshire Boulevard is a plastic backlit sign mounted to a metal pole that displays an arrow and reads "Robinsons-May Parking." The previous finding of eligibility for 9900 Wilshire Boulevard relates directly to the Robinsons-May Department Store building. Because the building is no longer extant, the property no longer retains historic integrity. As a result of this study, 9900 Wilshire Boulevard is recommended ineligible for listing in the NRHP, CRHR, or for local designation. It is no longer considered a historical resource for the purposes of CEQA.

Figure 7 Robinsons-May Site; View Northeast-Facing



5.3 Beverly Hilton Property

The following section summarizes the primary features of the Beverly Hilton Property, as well as a selected construction and ownership chronology. Figure 8 shows the location of the contributing buildings and features of the Beverly Hilton Property.

Wilshire Tower

The centrally located Wilshire Tower was designed to be the primary architectural feature of the Beverly Hilton property. As described by HRG in 2006:

> "The main hotel building [Wilshire Tower] was the first to be constructed during the 1953-55 period and contained the most significant spaces in the hotel. The hotel tower is the most significant component of the complex due to its eight-story 'Y' shape, the decoration of the spaces, and the uses contained in the building. The tower's 'Y' shape defines the hotel's relationship to its site and to the surrounding streets and city. It is highly visible in the west-bound traffic on Santa Monica and Wilshire Boulevards and marks the west end of Beverly Hills.
>
> The main building has sustained major alterations, most of which relate to two major renovation periods, one by Gin Wong Associates in 1989 and one in 2004 to 2006 by Gensler.
>
> The 1989 renovation changed many of the public spaces in the hotel; in particular, major alterations are apparent in the interior public spaces and entry court. The wall surfaces and floor surfaces of limestone date to this time, as do the eight-sided limestone-clad columns, wood flush paneling, stairs, and ramps. The open plan of the original hotel lobby remains more or less intact. However, the original palette of materials for the public spaces of the building (which included black terrazzo floors, travertine and marble walls, random pattern tile ceilings, and glass mosaic covering the columns) have been removed. Original window glazing has been replaced in most spaces in the building, although some original glazing remains. Built-in furniture was elevated on stainless steel legs throughout the lobby. These features remained in fragmentary form from when they were discovered during demolition for the most recent rehabilitation of the interiors in 2004.

Figure 8 Beverly Hilton Property



The 2004 renovation further changed the public spaces in the hotel. Severely damaged black terrazzo was found to remain on the floating staircase that leads from the main lobby level to the lower level, where the pool and restaurants are located. Damaged and missing terrazzo surfaces on the stairs were restored to match the extant terrazzo portions on the sides of the staircase during the 2004 renovation. Guest rooms on upper floors have been substantially modified over the years, but exterior balconies are largely intact. Original black terrazzo covers the balcony floors; and square panels that are placed perpendicularly to the hotel exterior walls to provide visual separation between each balcony remain. These elements were originally painted a variety of colors and are now white. The fenestration pattern remains on the windows on the side of the Wilshire Tower with no balconies. The glazing has been replaced on virtually all windows. The sliding glass doors on the balconies have been replaced and the pattern of the doors has been changed. The interior of the eighth floor was completely altered and repartitioned during the 2004 renovation. Other floors have had multiple alterations to the rooms."

There have been few physical changes to the Wilshire Tower since this time and the building today appears largely as described in 2006 (Figure 9 through Figure 11).

Figure 9 Wilshire Tower – View West from Santa Monica Boulevard



Figure 10 Wilshire Tower – View South from Wilshire Boulevard



Figure 11 Wilshire Tower – View East from Vehicle Entry Courtyard



Wilshire Edge

Immediately north of Wilshire Tower is the one-story Becket-designed Wilshire Edge Building (Figure 12 and Figure 13). As originally designed and constructed between 1953 and 1955, this building ran along Wilshire Boulevard from Merv Griffin Way to Santa Monica Boulevard. However, the eastern half of this building was demolished in 2016-17 as part of the Beverly Hilton Specific Plan and only the western portion remains. The demolished eastern segment contained the former Trader Vic's building components, including the gabled entry at the corner of Wilshire and Santa Monica Boulevards. As its name suggests, the Wilshire Edge Building was designed to create a strong urban edge along Wilshire Boulevard, which separated the exclusive residential Beverly Hills to the north from the commercial artery of Santa Monica Boulevard and the less unified area to the south.

The remaining western section of the Wilshire Edge Building retains many of its original design elements such as its horizontality, rectangular form and one-story composition. Wrapping around Wilshire Boulevard and Merv Griffin Way, the building features a series of unornamented circular concrete columns supporting a flat roof overhang with a thick parapet that creates a sheltered walkway. A line of mature landscaping separates this walkway from the public sidewalk. The façade of the building largely consists of square-section aluminum frames with replacement plate glass windows, some with filled-in transoms at the eastern end. The windows and transoms on the western side of the building have all been filled in but retain the aluminum framing. A few of the original travertine wall tiles and slabs between and above the windows remain. The interior of this section held the original Hilton offices but was reconfigured as a conference center during the 1989 Gin Wong Associates renovation.

Figure 12 Wilshire Edge Building – View South from Wilshire Boulevard



Figure 13 Wilshire Edge Building- View East from Wilshire Boulevard



Entrance Courtyards

The Vehicle Entry Courtyard was constructed during the original phase of development between the northwest and southwest wings of Wilshire Tower. The entrance is accessible from Merv Griffin Way through a long driveway separated by a landscaped median and cobblestone paving, which leads to a circular vehicle court centered on a tiered circular fountain (Figure 14). The hotel's main entrance is sheltered here under a semicircular concrete awning supported by thick round columns.

Although the semi-circular configuration of the Vehicle Entry Courtyard, the canopied entrance, and the glass wall are original to the 1955 design, the Vehicular Entry Courtyard has sustained multiple alterations. During the 1989 Gin Wong Associates alterations, the slender exterior columns in the car drop-off were enlarged, and some were removed. Original fenestration framing and finishes were removed and replaced with new frameless glazing. The length of the driveway overhang was extended beyond its original length. A circular water fountain was added at the center of the vehicular drop off. The granite tile pavers replaced interlocking pavers, and a plaster finish was added to the exterior surfaces.

A pedestrian entry courtyard is accessed from the northwest wing of Wilshire Tower at Wilshire Boulevard across from Trenton Drive. This area features wide entry steps, a shaded walkway supported by unornamented circular columns, planters and landscaping and a stepped site wall to shelter the pedestrian courtyard from the sidewalk (Figure 15). Directly east of the original entrance is the re-designed pedestrian entry extension, which was completed following the demolition of the eastern portion of the Wilshire Edge Building in 2016-17.

Figure 14 Vehicle Entry Courtyard – View South of Courtyard Fountain, Southwest Wing, Palm/Oasis Court and Garage



Figure 15 Pedestrian Entry Courtyard – View East



Swimming Pool and Lanai Rooms

The Swimming Pool, original to the property's design, and surrounding Lanai Rooms, added in 1960, are located south of the International Ballroom and sheltered in a courtyard between the south wings of Wilshire Tower. HRG described these features in 2006:

> "The swimming pool, a major element of the building's design, retains its distinctive shape. Round planters that were located in the deck have been removed. The original deck has been replaced (1988 permit indicated removal of a swimming pool concrete deck).
>
> The space surrounding the pool has been substantially altered as well. The International Ballroom (originally the Bali Room) was expanded between 1955 and 1960, leaving a second-story cantilever over the east edge of the pool and altering the space. This first expansion took place very early in the hotel's history. A second expansion of the ballroom left the swimming pool space partially overhung by the massive bulk of the ballroom, a significant spatial change. These changes impact the glass-walled coffee shop and snack bar originally adjacent to the pool deck on the northeast side which gave the space a much more open feeling. The pool area was originally framed with private cabanas, small spaces in which people could dress and use as a sort of home base while at the pool. The hotel has recently added an open bar to the pool area, C55, and has also remodeled and reconfigured the restaurant on the pool area. The new restaurant, circa 55, is reminiscent in style to the lounges and restaurants of the 1950s, hearkening back to the opening of the hotel.
>
> The Lanai Rooms were added, and the poolside cabanas removed, in 1960. These changes entailed further changes to the pool space. The construction of the Lanai Rooms represented a change to one of the main outdoor spaces of the hotel. The Lanai Rooms are incorporated into the pool space and are only visible within that space and from the gallery connecting the parking garage to the International Ballroom and its associated function rooms and from the Wilshire Tower. From Santa Monica Boulevard, the building presents a two-story patterned wall of square concrete blocks. The pool-facing facades of the Lanai Rooms were originally largely single-pane sliding glass doors with balconies, and panels of patterned concrete block. The plain glass doors were replaced with multi-pane doors in 2000. Interiors were redesigned, and the bathrooms enlarged at this time."

There have been minimal changes to the Swimming Pool and Lanai Rooms since they were last recorded in 2006 (Figure 16 and Figure 17).

Figure 16 Swimming Pool – View West, Facing Southwest Wing of Wilshire Tower, Lanai Rooms, and Garage

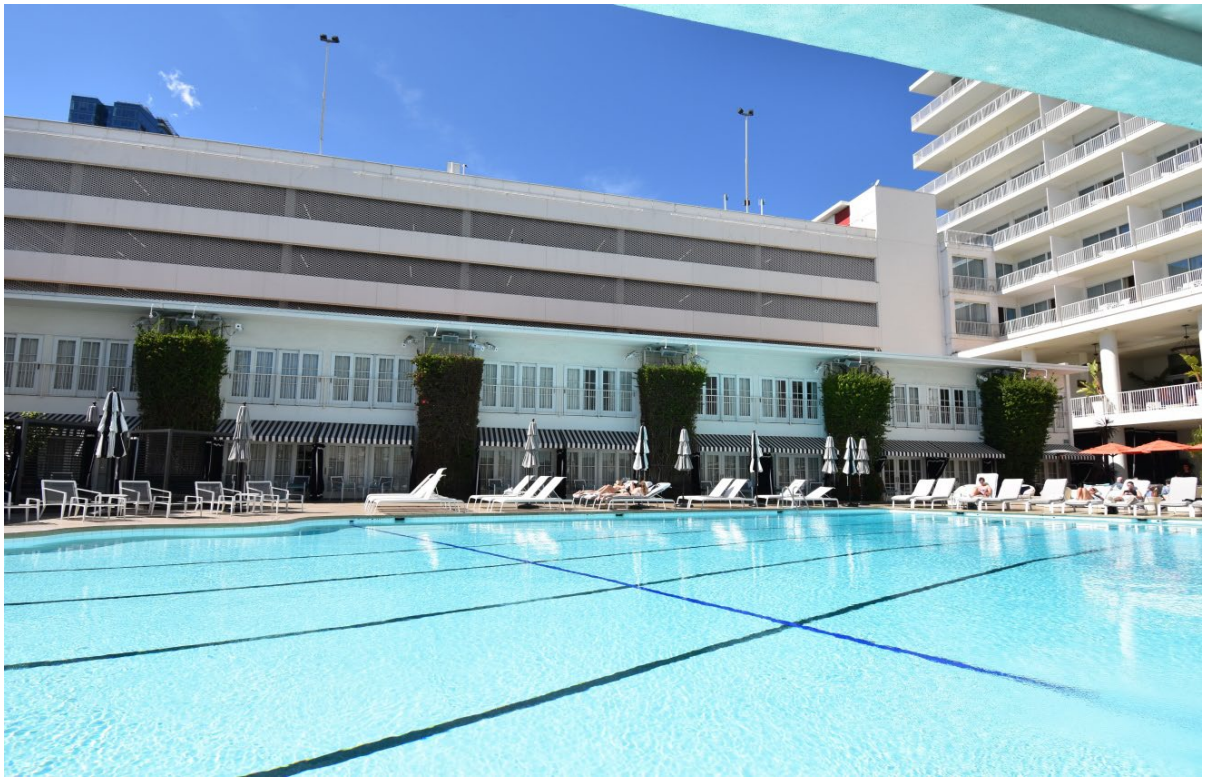

Figure 17 Swimming Pool and Lanai Rooms, View West



Palm/Oasis Court and Parking Garage

The four-story Palm/Oasis Court features a general U-shaped plan and is located between the southwest wing of Wilshire Tower and the western Wilshire Edge Building. The building was constructed in 1966, at the culmination of the property's associated period of significance, presumably in an effort to provide a more affordable option in response to market conditions (HRG 2006). The building defines the northern edge of the entry courtyard (Figure 18). Designed in a restrained version of Mid-Century Modernism, it is a concrete block building with its exterior street-facing façade divided by rows of aluminum-frame windows separated by narrow concrete bays. The building is oriented toward an outdoor patio with an octagonal fountain at the center.

The Parking Garage at the southwest corner of the hotel property was constructed in two phases. The first two levels were completed in 1955, and the three upper levels were added in 1961. The large structure consists of concrete wall surfaces and slabs with lattice grillwork at the parking levels and has remained largely unaltered since 1961 (Figure 19).

Figure 18 Palm/Oasis Court on Right and Parking Garage on Left – View West from Vehicle Entry Courtyard



Figure 19 Palm Oasis Court with Parking Garage at Right – View East on Merv Griffin Way



Waldorf-Astoria Beverly Hills

Completed in 2017, the Waldorf-Astoria building is located at the prominent northeastern corner of the hotel property (see Figure 20 and Figure 21). The Waldorf-Astoria replaced the eastern portion of the Wilshire Edge Building. The flatiron shaped building is approximately 12 stories and features a glass wall lobby that sits below a tower consisting of thick balcony floor slabs and recessed glass walls.

Figure 20 Waldorf-Astoria – View West from Wilshire Boulevard



Figure 21 Waldorf-Astoria – View West from Santa Monica Boulevard



Selected Construction and Ownership Chronology

Table 6 presents a selected construction and ownership chronology of the Beverly Hilton property.

Table 6 Beverly Hilton Construction and Ownership Chronology

Year(s)	Description	Architect
1953-1955	Property developed by Conrad Hilton. Original building construction consisted of the Y-shaped Wilshire Tower, the retail/office Wilshire Edge Building with Trader Vic's restaurant at the center, a one-level basement and surface Parking Garage at the southwest corner, and the Swimming Pool and surrounding cabanas.	Welton Becket and Associates
1955-1959	Completion of the offices and retail space in the eastern wing of the Wilshire Edge Building.	Welton Becket and Associates
1960	Construction of the two, two-story L-shaped "Lanai Rooms" buildings, which replaced the existing cabanas.	Welton Becket and Associates
1961	Three-story addition to the two-story parking structure.	Welton Becket and Associates
1966	Construction of the Palm/Oasis Court.	Welton Becket and Associates
1975	Sale of half-interest in hotel to Prudential Insurance Company.	N/A
1985	Remodel of Trader Vic's interior.	Gin Wong Associates
1986	Reconfiguration of the western wing of Wilshire Edge Building interior for a conference center.	Gin Wong Associates
1987	Purchase of hotel by television personality, Merv Griffin.	N/A
1989	Major alterations to the interior public spaces and entry court, including limestone wall and floor surfaces, eight-sided limestone columns, wood flush paneling, stairs, and ramps. Configuration of the eastern portion of Wilshire Edge Building as a conference center.	Gin Wong Associates
2003	Purchase of hotel by Oasis West Realty, LLC.	N/A
2004-2006	Significant renovations of interior space, public space and fenestration.	Gensler
2016-2017	Demolition of the eastern wing of the Wilshire Edge Building and former Trader Vic's buildings. Extension/alteration of the pedestrian courtyard at Wilshire Boulevard.	Gensler
2018	Construction of the Waldorf-Astoria.	Gensler

5.3.1 Updated Beverly Hilton Property Evaluation

As noted previously, the Beverly Hilton property has been the subject of multiple historic resource evaluations. Each has recognized the cultural and architectural significance of the property for its important role in the social history of the Los Angeles area and for its importance as a distinctive work of the noted architectural firm of Welton Becket. As discussed in the 2008 FEIR for the Beverly Hilton Specific Plan, the property was determined to retain sufficient integrity to be eligible for the NRHP and CRHR not only for its significant cultural (Criterion A/1) and architectural (Criterion C/3) associations, but also for its associations with Conrad Hilton (Criterion B/2). The period of significance for these associations was determined to be 1953 to 1955, which was derived using only the property's architectural significance under Criterion C/3 to recognize Becket's original design intent for the property. Contributing buildings and features under this period of significance included Wilshire Tower, the Wilshire Edge Building, the Vehicle Entry Courtyard and the Swimming Pool. Palm/Oasis Court, the Parking Garage and the Lanai Rooms were not considered character-defining features at that time.

While this serves as the starting point for the current analysis, an updated historical resources assessment was completed in accordance with the guidelines of the California OHP and to address changes that have occurred since the FEIR for the Beverly Hilton Specific Plan was certified in 2008 (California OHP 1995). These include physical changes to the property, such as the demolition of the eastern portion of the Wilshire Edge Building, alteration and reconfiguration of the pedestrian courtyard, and construction of the Waldorf-Astoria building at the eastern terminus of the property. The City of Beverly Hills has also adopted a Historic Preservation Ordinance since 2008, which is considered and addressed as part of the current evaluation. In addition, a number of the buildings on the property were not yet 50 years of age when they were last evaluated as part of the Beverly Hilton Specific Plan, an age threshold that is typically used to assess historical significance (California OHP 2006).

National and California Registers

As discussed further below, Rincon concurs that the Beverly Hilton property is significant under Criteria A/1, B/2, and C/3 of the NRHP and CRHR criteria, respectively, as previously determined in the 2008 FEIR for the Beverly Hilton Specific Plan. The period of significance for these important associations is 1953 through 1966. This differs from the 1953 through 1955 period of significance that was previously identified in 2008, which was derived using only the property's architectural significance under Criterion C/3 to recognize Becket's original design intent for the property. As described in further detail below, Rincon has extended the period of significance to 1966 to include buildings and features that reflect significant associations with cultural history and important individuals under Criteria A/1 and B/2. Demolitions and alterations that have occurred to the property since this time have negatively affected its integrity; therefore, the entirety of the property as a collection of buildings no longer appears eligible for NRHP listing.

Criterion A/1

Under Criterion A/1, the Beverly Hilton property demonstrates important associations with events that have made a significant contribution to local, state, and national history. It represents shifting concepts of the post-war hotel industry and the establishment of Hilton Hotel Corporation as one of the preeminent luxury hospitality brands during this period. As described by HRG, it was the "flagship for a new era of hotels" (HRG 2006). Its importance was exhibited through its prominent and visible siting at a major intersection and strikingly Modernist design idiom. These features

capitalized on the country's mass acceptance of the automobile after World War II and contributed to the hotel's popularity. Guests could see and be seen through Wilshire Tower's transparent façade, an important strategy in Hilton hotels, which became known as "machines for viewing" (Jones & Stokes 2007b). The views to and from Wilshire Tower are therefore of major importance in Hilton hotels from this era and are a notable character-defining feature of the genre. Another innovation in hotel design embodied by the Beverly Hilton was the large number of function rooms it contained. These spaces were intentionally planned and expanded by Hilton and Becket and made the hotel a popular location among the entertainment industry and Los Angeles society. While there were other notable hotels in the Los Angeles area, none offered the number or variety of function rooms that the Hilton contained. Throughout its history, these spaces hosted a number of prominent local and national events, including the annual Golden Globe Awards and other "industry" and political events.

Criterion B/2

The Beverly Hilton property is also significant under Criterion B/2 for its important associations with Conrad Hilton and Welton Becket. Both were notable and innovative individuals within their respective fields – Hilton, perhaps the most widely recognized hoteliers of the twentieth century and Becket, an architect that helped define southern California's Modernist built environment. Jones & Stokes (2007a) discussed the importance of these two individuals and how the Beverly Hilton property represented their significance to events in our past:

> They both developed business methods (analyzing and quantifying both needs and responses to them to maximize efficiencies) to accommodate a new age, epitomized by the new jet-setting American business client and corporate executive. These parallel approaches converged at The Beverly Hilton, a pioneer in hotel architecture in which cunning economies permitted both lower room rates and a high standard of luxury.

Both individuals were demonstrably significant within the context of their respective fields, and the Beverly Hilton property represents a notable collaboration and nexus between their innovative ideas.

Criterion C/3

The Beverly Hilton property is significant under Criterion C/3 as the work of a master, Welton Becket, and for its embodiment of the distinctive characteristics of Mid-Century Modernism. As previously discussed, Becket was responsible for some of southern California's most iconic Modernist buildings, including Bullock's Pasadena (1947), Capitol Records tower (1954), and the Santa Monica Civic Auditorium (1958). The Beverly Hilton was built during some of Becket's most productive years and reflects his ability to respond to a unique project site and the needs of his client. The hotel was designed to become an "instant landmark" and ultimately became a prototype for other Hilton International hotels (ARG 2006). Its location and prominence in the Hilton chain made the Beverly Hilton a prominent and nationally recognized work that was featured in national ad campaigns for Hilton Hotels.

The Beverly Hilton is equally important for its Mid-Century Modern architecture and design because it was completed by the firm during the first two phases of the complex's development. The main Wilshire Tower's distinctive Y-shape, prominent horizontality, early adoption of new building technologies and materials, low-key ornamentation, and open balconies are some of the key features of its Mid-Century Modern architecture. Becket's minimalistic modern design for the

Beverly Hilton set the standard for the chain and defined a new model for hotel plan and design. The design of the Beverly Hilton was a key example and product of Becket's "total design" strategy to include the firm's comprehensive design and oversight of everything from the hotel buildings to the matches and napkins designed for the hotel.

Noted master architect Gin D. Wong was responsible for a 1989 renovation that resulted in changes to interior public spaces. These alterations do not appear eligible under Criterion C/3. Wong was responsible for a number of projects in Beverly Hills, including the former Hilton Hotel Corporate office complex at 9336-9346 Civic Center Drive (1985), the Union 76 gas station (1965), and the office building at 100 North Crescent Drive (1989). Unlike his work at the Beverly Hilton, which was limited to renovation work, these other projects were conscious designs of complete buildings. Because there are better representations of Wong's work in Beverly Hills, the Beverly Hilton property does not appear significant for its association with Wong.

INTEGRITY

Since the Beverly Hilton property was last evaluated for historical significance in 2007, it has undergone developments that have resulted in a number of changes to the property; these include:

- Demolition of the eastern portion of the Wilshire Edge Building inclusive of Trader Vic's restaurant (2016-2017)
- Alteration and reconfiguration of the pedestrian courtyard along Wilshire Boulevard (2016-2017)
- Construction of the Waldorf-Astoria building at the eastern terminus of the project site (2018)

When considered as a collection of buildings, the above noted changes have affected the integrity of the Beverly Hilton property. As discussed above, the Wilshire Edge Building was designed by Master Architect Welton Becket, was constructed during the period of significance and contributed to the significance of the Beverly Hilton property. The demolition of half of this feature has negatively affected the property's integrity of design, setting, materials, workmanship, feeling, and association. The construction of the highly visible Waldorf-Astoria at the eastern edge of the property has further affected its integrity. Wilshire Tower was intentionally designed to be highly visible from the surrounding area, particularly from the prominent intersection of Wilshire and Santa Monica Boulevards. This notable design feature remained throughout the 1960s additions to the property and later alterations from the 1980s. However, development of the approximately 15-story hotel at the edge of this intersection has visually obstructed views of Wilshire Tower from the north and east. These views are a character-defining feature of the property and their obstruction has therefore impacted the property's ability to convey its significance.

The previously noted alterations have affected the integrity of the Beverly Hilton property such that it no longer appears eligible for NRHP listing as a property or collection of buildings, which requires that a property retain sufficient integrity to convey its historic significance. However, the California OHP recognizes that although a property may not retain sufficient integrity to be eligible for the NRHP, it may still be eligible for the CRHR (California OHP 2006). Per this guidance, the Beverly Hilton property appears eligible for the CRHR because the following contributing buildings remain and Wilshire Tower remains visible from two of its three primary vantage points: Wilshire Tower, western half of the Wilshire Edge Building, Swimming Pool, Lanai Rooms, Vehicle Entry Courtyard, Palm/Oasis Court and Parking Garage. The Wilshire Tower may additionally qualify for listing in the NRHP, CRHR, and local designation as an individual resource.

PERIOD OF SIGNIFICANCE

The period of significance refers to the date or span of time during which significant events and activities occurred. The 2008 FEIR for the Beverly Hilton Specific Plan determined that the Beverly Hilton property was significant under NRHP/CRHR Criteria A/1, B/2, and C/3. However, the 2008 FEIR defines the period of significance as 1953 through 1955, using only Criterion C/3 to capture the original design components.

Rincon concurs with the previous eligibility determination that the Beverly Hilton property is significant not only for its architectural merit under Criterion C/3, but also under Criteria A/1 and B/2 for its association with cultural history and important individuals (i.e., Conrad Hilton and Welton Becket). These latter associations were not limited to the original design implemented from 1953 through 1955, but rather spanned into the 1960s as Hilton and Becket further developed the property. The passage of additional time since the property was last evaluated has further confirmed that the Lanai Rooms, Parking Garage, and Palm/Oasis Court were developed as part of the ongoing collaboration between Hilton and Becket and provided the additional space, functions, and services that made the Beverly Hilton property an institution both in southern California and the entertainment industry. According to the guidance of the National Park Service, the period of significance should be based on the specific events directly related to the significance of the property and should combine overlapping periods as one longer period of significance when a property possesses multiple significant associations (NPS 1997). The current analysis has therefore identified the period of significance to be 1953 through 1966, which captures not only the original design of the property, but also the later additions by Hilton and Becket, which directly contributed to the ongoing success and preeminence of the property.

CONTRIBUTING BUILDINGS/FEATURES

The Beverly Hilton property contains a number of buildings and features that were constructed during the period of significance and contribute to its CRHR eligibility under Criteria 1, 2, and 3. Contributing buildings and features have been identified following NPS guidance. Per this guidance, "a contributing building, site, structure, or object adds to the historic associations [or] historic architectural quality… for which a property is significant because it was present during the period of significance, relates to the documented significance of the property, and possesses historic integrity…" (NPS 1997:16). Taking NPS guidance into account, the following buildings and features are those that contribute to the significance of the Beverly Hilton Property: Wilshire Tower, Wilshire Edge Building, Swimming Pool and Lanai Rooms, Vehicle Entry Courtyard, Palm/Oasis Court and Parking Garage.

To aid future planning efforts, it may be useful to identify which buildings and features of the Beverly Hilton property are most critical in its ability to convey historical significance. As indicated in Table 7, the property's contributing buildings and features have been divided into three tiers, primary, secondary and tertiary, according to their importance as it relates to the property's ability to convey significance. Those that are highly representative of the property's historical and architectural significance and most clearly embody all of its significant associations are considered the primary contributing buildings and features of the property. While secondary and tertiary buildings and features may also represent these associations, they do so to a lesser degree, either due to the quality of their design or the date of their construction. Secondary buildings are less characteristic of the Mid-Century Modern Style than is Wilshire Tower. However, these buildings were components of the property's initial design and therefore also clearly express its significant associations. Tertiary buildings and features are least important in the property's ability to convey

significance. They were added to the property following its initial design and therefore, are not essential in the property's ability to convey significance.

Table 7 Contributing Buildings and Features of the Beverly Hilton Property by Tier

	Primary	Secondary	Tertiary
Building/Feature	▪ Wilshire Tower	▪ Wilshire Edge ▪ Swimming Pool ▪ Vehicle Entry Courtyard	▪ Parking Garage ▪ Palm/Oasis Court ▪ Lanai Rooms

The Beverly Hilton Property is significant under multiple designation criteria, 1, 2 and 3. However, the property's buildings and features are variously representative of its significant associations. As the center piece of the Beverly Hilton Property, around which all contributing buildings and structures are oriented, Wilshire Tower is the property's primary contributing building. Its function as a hotel representative of the post-war hotel industry and the establishment of Hilton Hotel Corporation is most distinctly embodied in Wilshire Tower. With its high style, Wilshire Tower clearly expresses the collaborative relationship between Conrad Hilton and Master Architect Welton Becket and additionally embodies the principles of Mid-Century Modernism.

Secondary buildings and features of the Beverly Hilton Property are Wilshire Edge Building, Swimming Pool and the Vehicle Entry Courtyard. While these buildings and features are original to the property's design and convey significance, they clearly represent less of a design investment when compared to Wilshire Tower. Rather, they were designed to complement Wilshire Tower. When considered individually, these buildings and features integrate some of the principles of Mid-Century Modernism but certainly to a lesser degree than Wilshire Tower and are therefore considered secondary. The Parking Garage, Palm/Oasis Court and Lanai Rooms are the property's tertiary buildings and features. These buildings and features were designed in a manner consistent with those original to the property's design. However, they are later additions and are more minimal in terms of their style and detailing when considered individually and are therefore least important in the property's ability to convey significance.

Application of City Landmark (Significance) Criteria

The subject property does appear to meet the necessary City of Beverly Hills Landmark criteria (BHMC 10-3-3212) based on current research and the above assessment. The contributing buildings and features (i.e., Wilshire Tower, Wilshire Edge Building, Swimming Pool and Lanai Rooms, Vehicle Entry Courtyard, Palm/Oasis Court, and Parking Garage) were evaluated according to municipal code criteria as listed under Section 2.3, *City of Beverly Hills*. The property meets the following criteria (BHMC 10-3-3212(A)):

BHMC 10-3-3212 (A)(1). The property is over 45 years of age or is a property of extraordinary significance.

Construction for the Beverly Hilton hotel began in 1953. Additions to the Beverly Hilton hotel, including the Lanai Rooms, Oasis/Palm Court and a large portion of the Parking Garage, were constructed in the 1960s. Therefore, the property satisfies this criterion.

BHMC 10-3-3212(A)(2). The property possesses high artistic or aesthetic value and embodies the distinctive characteristics of an architectural style, architectural type, or architectural period.

As a singular resource, the property possesses high artistic style and aesthetic value. Some of the buildings and features contributing to the subject property, for example Wilshire Tower, exhibit the distinctive elements of the Mid-Century Modern style as designed by the master architecture firm of Welton Becket and Associates, while secondary and tertiary features offer limited or no contribution to the Mid-Century design. Additionally, the property as a whole possesses aesthetic value due to its site layout and the interaction of its contributing elements. Therefore, the property satisfies this criterion.

BHMC 10-3-3212(A)(3). The property retains substantial integrity from its period of significance.

The property's period of significance is defined as 1953 to 1966. Since this time, the property has undergone a number of alterations, including renovations in 1989 and 2004, the demolition of the eastern Wilshire Edge Building, and the construction of the Waldorf-Astoria at the eastern terminus of the site. Although these changes have affected many aspects of the property's integrity, the property still retains a sufficient number of its contributing resources, character-defining features, and important viewsheds from its period of significance to meet this criterion.

BHMC 10-3-3212(A)(4). The property has continued historic value to the community such that its designation as a landmark is reasonable and necessary to promote and further the purposes of this article.

The property is an important representation of the City's unique and diverse architectural, commercial and cultural heritage dating from the post-war period. Therefore, it has historic value to the local community.

The property also appears to meet many of the criteria under BHMC 10-3-3212(B).

BHMC 10-3-3212(B)(1). It is listed on the National Register of Historic Places.

The subject property is not listed in the NRHP. Therefore, the property does not satisfy this criterion.

BHMC 10-3-3212(B)(2). It is an exceptional work by a master architect. The BHMC, which defines an "exceptional work" as the following:

> A remarkably superior example of architectural work that has been recognized as such by members of the architectural community. At a minimum, the work's exceptional quality shall have been documented by at least one of the following: a) it was the subject of a major architectural award; b) it was substantively discussed (i.e., not just mentioned) and photographically depicted in a monograph on a master architect's career; or c) it was substantively discussed or photographically depicted in at least two (2) publications (e.g., a book, treatise, trade magazine article, film, or set of photographs made available to the public by an institutional archive) authored by acknowledged experts in the field of architecture. A monograph of publication made available to the public solely in electronic form and without any reasonable expectation of compensation to the author, or substantially authored by the architect of the work, shall not count toward this minimum (BHMC 10-3-3202).

In consideration of these criteria, as a whole the collection of buildings located on the subject property is an exceptional work as defined by the BHMC. As detailed above in Section 3.3, *Historic Context*, and Section 5.1.1.1, *National and California Registers*, the contributing buildings and features on the subject property are an important work of Welton Becket and

Associates, and the components constructed during the first phase of development were the subject of numerous awards and article spreads in historic magazines. Therefore, although buildings on the property satisfy this criterion to various degrees individually, the property satisfies this criterion. Although interior renovations were made by Gin D. Wong, a master architect, these changes are not considered an exceptional example of Gin D. Wong's work or of the Corporate Modern/Postmodern styles and have not acquired significance. In addition, Wong's renovations were substantially modified by Gensler designed renovations in 2004.

BHMC 10-3-3212(B)(3). It is an exceptional work that was owned and occupied by a person of great importance and was directly connected to a momentous event in the person's endeavors or the history of the nation.

The BHMC defines 'a person of great importance' as "a person whose activities had a substantial impact on the history of the nation, which impact can be demonstrated through scholarly research and judgment. At a minimum, a person of great importance is someone whose name and exploits were widely known across America during his/her lifetime, and whose widespread fame continues through to the present day. A person shall not be considered to be of great importance by virtue of his/her position or title, race, gender, ethnicity, or religion (BHMC Section 10-3-3202)." The subject property is considered an exceptional work that was owned by a person of great importance as defined by BHMC, Conrad Hilton. The endeavors of Conrad Hilton are associated with important post-war events in the history of the nation. He was also notable for his productive years as the developer and key representative of the Hilton Hotel and for developing methods in the hospitality industry to accommodate a new age. The subject property directly represents these associations and set a precedent for Hilton hotels in the post-war era. Therefore, the property satisfies this criterion.

BHMC 10-3-3212(B)(4). It is an exceptional property that was owned and occupied by a person of great local prominence.

The BHMC defines 'a person of great local prominence' as one "whose activities had such a substantial impact on the history of the city of Beverly Hills that a public street or public park in the city was named after him or her (BHMC Section 10-3-3202). As Conrad Hilton does not have a public street or public park in the city named after him, the property does not satisfy this criterion.

BHMC 10-3-3212(B)(5). It is an iconic property.

The BHMC defines as 'iconic property' as "property that has been visited and photographed so often by residents and visitors to the city that is has become inextricably associated with Beverly Hills in the popular culture and forms part of the city's identity to the world at large (BHMC Section 10-3-3202)." The Beverly Hilton is an iconic property as defined by the BHMC. It has been previously identified as significant in multiple evaluations and is located at a prominent location in Beverly Hills. Since its development in 1953, it has been a major hub for the entertainment industry and the site of numerous award ceremonies including the Golden Globes and other high-profile events. As a result, the property meets this criterion.

BHMC 10-3-3212(B)(6). The landmark designation procedure is initiated, or expressly agreed to, by the owner(s) of the property. (Ord. 15-O-2682, eff. 11-19-2015)

The Beverly Hilton property's landmark designation procedure has not been initiated or agreed to by the owners of the property. Therefore, the property does not satisfy this criterion.

5.4 Los Angeles Country Club

5.4.1 Physical Description

The LACC property is a golf course and country club comprised of multiple parcels, including Los Angeles County APNs 4359018008, 4359020006, 4327027001, and 4359018007, which total approximately 300 acres (City of Los Angeles Department of City Planning 2020). Bisected by Wilshire Boulevard, the country club contains two 18-hole golf courses, a clubhouse building, tennis courts, parking lots, and various ancillary buildings such as maintenance and restroom buildings and a greenhouse. The more complex designed North Course is located north of Wilshire Boulevard and the more restrained and smaller South Course is located south of Wilshire Boulevard.

The North Course is characterized by its 1927-1928 design (restored in 2015 by golf architect Gil Hanse) which flows with the natural topography of the land. It includes a dry wash running through the course, sand hills, grass, unique bunkers in the "Billy Bell Bunker" style which have uneven, toothy edges rimmed with shaggy grass, numerous varieties of trees, a natural area at the north end of the property, thick plantings along the perimeter fence line, and golf cart paths. The South Course, a contemporary design by Gil Hanse in 2015, includes similar bunkers, grass, golf cart paths, and sparser tree groupings.

The LACC clubhouse is a large two-story building located slightly north of Wilshire Boulevard and oriented generally north-south on the property. Built in 1911, the year LACC moved to the Wilshire Boulevard location, the clubhouse was designed by prominent local architect and golfer Sumner P. Hunt. The original portion of the building is noted by its hipped roof with overhanging eaves and a primarily U-shaped footprint with a smaller wing projecting to the north. Based on aerial photos, the U was filled in on the west side of the building with a flat-roofed addition on which mechanical equipment is currently mounted. It appears additions were built at the northeast corner and north side of the building between the 1950s and 1960s. Based on historic photos, other alterations include the addition of porches supported by columns across the façade, the enclosure of the rotundas, addition of patio areas enclosed by balustrades, and replacement of original doors and windows. Construction/alterations were taking place on the clubhouse at the time of the survey and the entirety of the building was not surveyed. Paved parking lots are located adjacent to the clubhouse to the south and west. To the northeast of the clubhouse is a grouping of approximately five buildings which appear to include a golf cart building, garage and possibly an employee residence, surrounded by hedges and shrubs.

5.4.2 Updated LACC Historical Evaluation

As previously noted, a three-acre portion of the LACC property was evaluated for historic significance in 2011 and found eligible for listing in the NRHP and CRHR (images of the LACC property are shown in Figure 22 and Figure 23). It was recommended eligible under Criteria C/3 as a historic landscape that embodies the distinctive characteristics of a professionally designed landscape over 50 years old with sufficient integrity to qualify for listing in the NRHP and CRHR. The property was additionally identified by SurveyLA in 2015. SurveyLA did not perform a formal evaluation of the property due to its inaccessibility from the public right-of-way. However, the survey results discussed the property's potential historic significance and indicated it appeared eligible for listing in the NRHP, CRHR and as a City of Los Angeles HCM under Criteria A/1/1 and C/3/3. The survey indicated the property appeared eligible under Criteria A/1/1 as an excellent

Figure 22 Representative Photograph of the South Course



Figure 23 Representative Photograph of the North Course



example of an early 20th century golf course and country club in the city of Los Angeles which has been in continuous use since 1911. It additionally indicated the property appeared eligible under Criteria C/3/3 as an excellent example of an early 20th century golf course designed by master golf course architects Herbert Fowler and George C. Thomas Jr. As the entire property has not been formally subject to historic resources evaluation, a historic resources evaluation was prepared as part of the current study to determine its NRHP and CRHR eligibility. Although it is adjacent to the project site, the property is formally located within the boundaries of the city of Los Angeles. As a result, the property was not evaluated using local City of Beverly Hills Landmark criteria.

National and California Registers

As discussed further below, Rincon's updated historical evaluation concludes that the LACC property is significant and eligible for listing in the NRHP and CRHR at the local level of significance under Criteria A/1 for its association with the broad patterns of local history, specifically the early development of private recreational facilities in the city of Los Angeles. Additionally, the North Course is significant under Criteria C/3 as an excellent example of a 1920s golf course designed by master golf course architects George C. Thomas Jr. and William "Billy" Bell during a period known as the golden era of golf course design.

Criterion A/1

The LACC appears significant at the local level of significance under Criteria A/1 for its association with the broad patterns of local history, specifically the early development of private recreational facilities in the city of Los Angeles. The property is an extant representative example of an early 20th century private country club and golf course which has remained in the continual use since it was originally developed in 1911. At the time of its development, the future site of LACC was a remote and largely undeveloped area near the growing but small town center of Beverly Hills. The Beverly Hills Hotel, completed in 1912, and the LACC both served to draw visitors and spurred development in the surrounding area. Annexed in 1916 into the city of Los Angeles' boundaries, the LACC may be the oldest extant golf course in the city of Los Angeles proper. Other extant golf clubs from the approximate era and in the greater Los Angeles area include the San Gabriel Country Club founded in 1904 near Mission San Gabriel, the Annandale Golf Club founded in 1906 on the west side of Pasadena' Arroyo Seco, and the Wilshire Country Club, founded in 1919. As relayed by LACC historian, Adrian Whited, due to golf's growing popularity, by the 1930s there were approximately 40 golf courses in the greater Los Angeles area spanning from the San Fernando Valley to Long Beach, and from East Los Angeles to the Pacific Ocean. Within this context, the LACC is an excellent representative example of one of the earliest extant private golf clubs in Los Angeles.

Criterion B/2

The LACC does not appear significant under Criteria B/2. Archival research shows club membership included numerous wealthy and well-known individuals. However, they were not directly associated with the LACC organization, rather, they came to recreate as did countless others on the property. Archival research did not indicate the LACC property is directly associated with the lives of persons important to local, California or national history.

Criterion C/3

The North Course of the LACC property appears significant under Criteria C/3 as an excellent example of a 1920s golf course designed by master golf course architects George C. Thomas Jr. and

William "Billy" Bell during a period known as the golden era of golf course design (Sothern California Golf Association 2017). This design is limited to the North Course which embodies the distinctive characteristics of a type and represents the work of a master. It is significant for the unique elements for which Thomas and Bell are known, such as the incorporation of the natural topography and setting into the golf course layout, bunkers with artistic, uneven edges, and holes that can be played by various approaches. While the Thomas and Bell Design was altered in the years after it was completed in 1928, the North Course was carefully restored to its 1928 design in 2015 by Gil Hanse. California OHP guidance states that historical resources which have been rehabilitated or restored may be evaluated for listing. In addition, the 1911 clubhouse represents the work of a master, architect Sumner P. Hunt.

Criterion D/4

The LACC does not appear significant under Criteria D/4 as the golf course and its buildings were constructed using common building materials; the property does not have the potential to yield information regarding local building traditions or methods. Available evidence does not indicate the golf club property has the potential to yield information important to prehistory or history.

Integrity

Integrity is the ability of a property to convey its significance. As indicated in the significance evaluation above, since the completion of the Thomas and Bell design of the North Course in 1928, the LACC property has undergone various changes including:

- Modifications to the property boundary through sales and purchases of additional property
- Demolition of original (1911) buildings and structures such as employee bungalows, mowing horse barn, and early bridges connecting parts of the golf course
- Additions to the clubhouse on the west, east and north elevations and replacement of clubhouse windows
- Various alteration to the design/layout of the North and South Course (over several decades)
- Addition of new features such as practice putting greens (1930) four miles of perimeter fencing (1946), entry signage (1956)
- Addition of new buildings and structures such as greenhouse (circa 1939), growing house (1940), golf shop (1966), maintenance building (1981) and bridge (1983)
- Enlargement of the tunnels under Wilshire Boulevard (1955 and 1958)
- Construction of new pathways throughout (1950s and 1960s)
- Enlargement of parking lots and the golf cart storage area
- Modification to the types of trees/plantings located on the property (over several decades)
- Refurbishment of the North and South Courses (several times throughout the 2000s)
- 2015 redesign of the South Course by Gil Hanse
- 2015 restoration of the North Course by Gil Hanse

Although the boundaries of the LACC property have been expanded and diminished over time, the location of many of its character-defining features retain their location from the period of significance. The location of the property's two 18-hole golf courses and that of Wilshire Boulevard within the property are original to its period of significance. The property's access road off Wilshire Boulevard and its clubhouse remain in their original location. Therefore, the property retains

integrity of location sufficient to convey its significant associations under Criteria A/1 and C/3 (North Course).

The LACC property is significant as an excellent example of a 1920s golf course designed by master golf course architects George C. Thomas Jr. and William "Billy" Bell during a period known as the golden era of golf course design. However, while the North Course was restored to its 1928 appearance in 2015, a new design was applied to the South Course in 2015 such that it no longer retains integrity of design, materials and workmanship. While the North and South Courses retain sufficient integrity of design, materials and workmanship to convey their significant associations under Criteria A/1, only the North Course retains sufficient integrity of design, materials and workmanship to convey its significant associations under Criteria C/3.

At the time of its initial development, the LACC property was surrounded by a rural setting. However, by the end of its period of significance, the cities of Beverly Hills and Los Angeles had grown to surround the property with development which has only densified since the historic period. Although not the intention of the property's location in its initial development, the LACC has none the less functioned as an urban golf course for much its existence. However, due to its size and the retention of vistas within it, it retains integrity of setting, feeling and association sufficient to convey its significant associations under Criteria A/1 and C/3 (North Course).

Period of Significance

As noted above in the Beverly Hilton property historical evaluation, a property's period of significance refers to the date or span of time during which significant events and activities occurred. LACC moved to its current location in 1911. From 1911 through 1928, the LACC property was developed to include two 18-hole golf courses, the North and South Courses, and a clubhouse in addition to variety of associated features and structures. Under Criteria A/1, the property's significance is related to its development within the context of the City of Los Angeles' recreational development in the early 20th century. Therefore, the period of significance associated with Criterion A encompasses its initial development, which occurred progressively from 1911 through 1928. Under Criteria C/3, the property's significance is related to its association with master golf course architects George C. Thomas Jr. and William "Billy" Bell as excellent example of their work. As both Thomas's and Bells contributions to the property occurred in its initial phase of development, between 1911 and 1928, the period of significance associated with Criteria C/3 also spans this period.

Character-Defining Features

According to the National Park Service, the character of landscapes is defined by their spatial organization and land patterns, features such as topography, vegetation, and circulation, and their materials. As noted in the evaluation above, the significance of the LACC property under Criteria A/1 is associated with the entirety of the property. The character-defining features of the property that convey its significance under Criteria A/1 include the following:

- Presence of two 18-hole courses
- Division of the property by Wilshire Boulevard
- Varied topography within boundaries
- Trees (including California Sycamores) scattered throughout and along some of its perimeter
- Primary entry road off Wilshire Boulevard leading to clubhouse
- Retention of natural drainage features
- Lack of artificial water features
- Tunnels (2) under Wilshire Boulevard
- Prominently located Sumner P. Hunt designed clubhouse
- Tennis courts located west of clubhouse (4)

The significance of the LACC property under Criterion C is associated only with the North Course. In addition to those noted above, the following character-defining features convey the significance of the North Course under Criteria C/3:

- Bunker design (Billy Bell Bunker)
- Course layout (including fairways, tees and bunkers)
- Presence of naturally landscaped areas throughout

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6 Impacts Analysis, Mitigation, and Conclusions

The thresholds for determining the significance of environmental impacts on historical resources are derived from Section 15064.5(b) of the *CEQA Guidelines*. The *CEQA Guidelines* state that "a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Substantial adverse change occurs when the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings materially impairs its significance. Material impairment occurs when a project:

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

For purposes of this study, existing conditions and remaining buildout allowed under the Existing Specific Plans (Approved Entitlements) are both used as baselines for the analysis. Buildout allowed under the Existing Specific Plans (Approved Entitlements) is included as a baseline because it represents what is currently permitted for development at the project site. For this study, a significance determination was made against both the existing conditions and Approved Entitlements under the Existing Specific Plans.

The proposed project would allow for the comprehensive and coordinated redevelopment of the project site. It would result in the select demolition and alteration of existing buildings and the development of six new buildings, in addition to small-scale features and gardens, on the project site. Existing Specific Plans included the following elements previously analyzed for their potential impact to cultural resources:

- Demolition of Robinsons-May Department Store
- Redevelopment of 9900 Wilshire Boulevard with 193 condominium units and a 134-room luxury hotel in two buildings, along with an ancillary building for publicly accessible amenities, including approximately 16,057 sf of hotel restaurant space, 7,942 sf of meeting space, 14,435 sf of spa and fitness, and other guest amenities space under the 2016 9900 Wilshire Specific Plan.
- Demolition of the Wilshire Edge Building, the Vehicle Entry Courtyard and the Swimming Pool
- Redevelopment of the Beverly Hilton property with a hotel, conference center and commercial building under the Beverly Hilton Specific Plan

The Beverly Hilton Specific Plan 2008 EIR and the 9900 Wilshire Specific Plan 2016 SEIR (herein referred to as previous environmental documentation) determined that implementation of the Existing Specific Plans would result in significant impacts to built environment resources and less than significant impacts to archaeological resources.

Similar to the Existing Specific Plans, the Overlay Specific Plan would include demolition of the Wilshire Edge Building, the Vehicle Entry Courtyard, and the Swimming Pool, which was previously analyzed in the Beverly Hilton Specific Plan 2008 EIR (City of Beverly Hills 2008a). The Robinsons-May Department Store was demolished in 2014, and is not included as part of the project. The Overlay Specific Plan includes the following elements not previously analyzed for their potential impact to cultural resources:

- Demolition of existing gas station at 9988 Wilshire Boulevard and integration of gas station site into the project site
- Demolition of Palm/Oasis Court, Parking Garage and Lanai Rooms, which were not considered historical resources at the time the Existing Specific Plans were approved but are proposed to be demolished under both existing Hilton entitlements and under the proposed project.
- Redistribution of previously approved FARs resulting in increased building heights and the construction of six buildings spread throughout the project site.

6.1 Historical Resources Impacts

Redevelopment of Gas Station Site

Existing Conditions

The proposed project would result in the demolition of an existing gas station at 9988 Wilshire Boulevard and integration of 9988 Wilshire Boulevard into the project site. The research and site visit performed for this study affirmed that the gas station site was developed less than 45 years ago. It therefore does not warrant further investigation as a potential historical resource per the guidance of the California OHP (OHP 1995). Therefore, in comparison to existing conditions, demolition of the non-historic period features located on the gas station site and its integration into the project site would not result in impact to historical resources because no historical resources exist on this portion of the project site.

Approved Entitlements

The gas station site was not included in previous environmental documentation for the Existing Specific Plans because the site does not lie within the area subject to the Existing Specific Plans. For the reasons detailed above, demolition of the non-historic period features located on the gas station site and its integration into the project site would not result in impact to historical resources because no historical resources exist on this portion of the project site.

Demolition and Redistribution of Previously Approved FAR

Direct Project Site

EXISTING CONDITIONS

As discussed above, the gas station site and 9900 Wilshire Boulevard site are not historical resources for the purposes of CEQA. Therefore, the development of these sites under the Overlay Specific Plan would result in no impact to historical resources.

The proposed project would result in the demolition of the Wilshire Edge Building, the Vehicle Entry Courtyard, and the Swimming Pool, in addition to the Palm/Oasis Court, Parking Garage and Lanai Rooms. Under the Overlay Specific Plan, six buildings and associated development and gardens would be constructed throughout the project site. Implementation of the Overlay Specific Plan has the potential to result in impacts to the Beverly Hilton property because it includes the demolition of buildings that contribute to the significance of the property and the construction of buildings within the boundaries of the resource in addition to outside of the boundaries of the resource in its immediate vicinity, thereby altering its setting.

The historic significance of the Beverly Hilton property has been previously explored several times. The current study performed an update to the historical evaluation which concludes that the Beverly Hilton property is eligible for listing in the CRHR and local historic designation and, therefore, is a historical resource for the purposes of CEQA. The property is significant for its direct and important associations with post-World War II commercial and cultural history, Conrad Hilton and Welton Becket, and its noteworthy architectural features. The period of significance for these associations is from 1953 and 1966, beginning with its construction and extending through its subsequent expansion under Hilton and Becket. As previously discussed in this report, the following buildings and features which were constructed during this period and which still retain integrity are considered buildings that contribute to the significance of the property: Wilshire Tower, the Wilshire Edge Building, the Swimming Pool and Lanai Rooms, the Vehicle Entry Courtyard, Palm/Oasis Court and the Parking Garage.

The proposed project would have a significant impact on this historical resource due to proposed demolition and construction activities. The project would demolish the following contributing buildings: Wilshire Edge Building, Vehicle Entry Courtyard, and Swimming Pool, all secondary contributing buildings and features, in addition to the Lanai Rooms, Palm/Oasis Court and Parking Garage, tertiary contributing buildings and features. These buildings and structures represent the collaboration between Becket and Hilton and directly contribute to the significance of the Beverly Hilton property as a historical resource. The demolition of these features would materially impair the resource and alter in an adverse manner those physical characteristics that help to convey its historic significance. As a result of these demolition activities, the Beverly Hilton Property as a whole would no longer retain substantial integrity from its period of significance as required by the CRHR and the City of Beverly Hills' Register of Historic Properties under BHMC 10-3-3212(A)(3). This would result in a substantial adverse change to a historical resource and would create a significant impact to historical resources. Although Wilshire Tower may qualify for historic designation as an individual resource, the Beverly Hilton property as a collection of buildings would no longer retain substantial integrity from its period of significance or remain eligible for CRHR designation.

The redistribution of previously approved FARs throughout the project site as part of the Overlay Specific Plan would result in the construction of six buildings on the project site. Two of the buildings would be located in the western portion of the Beverly Hilton property. These include the

31-foot-tall Conference Center and the Beverly Hilton Enhancement, which would be just under 20 feet tall. Additionally, the project includes the construction of the following buildings west of the Beverly Hilton property at 9900 Wilshire Boulevard and the gas station site: Santa Monica Residences at 410 feet tall, Garden Residences at 369 feet tall, Wilshire Building at 124 feet tall and Park Pavilion at 20 feet tall.

Historically, the Beverly Hilton property had three primary views from the three major primary thoroughfares that surrounded it: from the east at the intersection of Santa Monica and Wilshire Boulevards, from the west from Wilshire Boulevard, and from the south and west from Santa Monica Boulevard. Views from the building are additionally character-defining. These viewsheds were an intentional design component of Wilshire Tower and encouraged guests to see and be seen. Wilshire Tower created a precedent for future Hilton hotels, which became known as "machines for viewing." The views to and from Wilshire Tower are therefore of major importance in Hilton hotels from this era and are a notable character-defining feature of the genre. The first of these views was lost following completion of the Waldorf-Astoria under the Beverly Hilton Specific Plan (Figure 24). The construction of the buildings noted above would collectively diminish views both to and from the Wilshire Tower, thereby altering its setting and resulting in an impact to historical resources, the Beverly Hilton property (Figure 25).

Figure 24 Current Southeast-Facing View from the Roof of the Beverly Hilton



Figure 25 Current West-Facing View from the Beverly Hilton



Although not capable of reducing impacts to below a level of significance, two mitigation measures have been identified to reduce the proposed project's impacts to historical resources. Mitigation Measures MM CR-5 and MM CR-6 below seek to expand knowledge of the property's social and cultural history and convey that knowledge to the general public. Implementation of Mitigation Measures MM CR-5 and MM CR-6 would reduce impacts to the historical resources; however, impacts would remain significant and unavoidable.

While it remains eligible for listing in the CRHR and local designation, at the current time, the Beverly Hilton property as a whole is not eligible for listing in the NRHP due to integrity considerations. Following implementation of the proposed project, the property would additionally no longer meet integrity requirements for listing in the CRHR or as a City of Beverly Hills landmark. However, the Wilshire Tower has the potential to individually warrant such designation even after buildout of the proposed project. It is the centerpiece of the Beverly Hilton property and appears to independently meet NRHP and CRHR Criteria A/1, B/2 and C/3 and several of the criteria outlined in BHMC 10-3-3212(A). Therefore, the City of Beverly Hills and the owner of the Beverly Hilton property should consider the designation of Wilshire Tower as a local landmark.

Previous environmental documentation for the Existing Specific Plans documented potentially historic streetlights surrounding the project site. The research conducted for this study indicates that these potentially historic streetlights no longer remain. The Overlay Specific Plan does not propose any alteration or modification to existing streetlights in the vicinity of the project site. However, if alteration and/or replacement of the existing streetlights in the vicinity of the project site is later proposed, this study recommends that any necessary replacement be undertaken in-kind with the streetlights that currently exist.

APPROVED ENTITLEMENTS

As discussed above, the gas station site and 9900 Wilshire Boulevard site are not historical resources for the purposes of CEQA. Therefore, in comparison to development of approved entitlements, the development of these sites under the Overlay Specific Plan would result in no impact to historical resources.

As detailed above, the following buildings and features contribute to the significance of the Beverly Hilton property: Wilshire Tower, the Wilshire Edge Building, the Swimming Pool and Lanai Rooms, the Vehicle Entry Courtyard, Palm/Oasis Court and the Parking Garage. The proposed project would result in the demolition of the Wilshire Edge Building, the Vehicle Entry Courtyard, and the Swimming Pool, in addition to the Palm/Oasis Court, Parking Garage and Lanai Rooms. Under the Overlay Specific Plan, six buildings and associated small-scale development and gardens would be constructed throughout the project site. Implementation of the Overlay Specific Plan has the potential to result in impacts to the Beverly Hilton property because it includes the demolition of buildings that contribute to the significance of the property and the construction of buildings within the boundaries of the resource in addition to outside of the boundaries of the resource in its immediate vicinity, thereby altering its setting.

Similar to the Existing Specific Plans, the proposed project would have a significant impact on this historical resource due to proposed demolition and construction activities. In addition to demolition of the Wilshire Edge Building, the Vehicle Entry Courtyard, and the Swimming Pool, the project would demolish the following contributing buildings that were not formerly considered historic: Palm/Oasis Court, Parking Garage and Lanai Rooms. These buildings and structures represent the collaboration between Becket and Hilton and directly contribute to the significance of the Beverly Hilton property as a historical resource. The demolition of these features would materially impair the resource and alter in an adverse manner those physical characteristics that help to convey its historic significance. As a result of these demolition activities, which would also occur under the Existing Specific Plans, the Beverly Hilton property as a whole would no longer retain substantial integrity from its period of significance as required by the CRHR and the City of Beverly Hills' Register of Historic Properties under BHMC 10-3-3212(A)(3). This would result in a substantial adverse change to a historical resource and would create a significant impact to historical resources.

The 2007 Jones & Stokes assessment prepared for the Beverly Hilton Specific Plan did not identify the Palm/Oasis Court, the Parking Garage and the Lanai Rooms as contributing buildings and features due to the more limited evaluation period used (City of Beverly Hills 2008a). The updated historic evaluation contained herein expanded the Property's period of significance to 1966 and identifies Palm/Oasis Court, Parking Garage and Lanai Rooms as tertiary contributing buildings . As a result of the change in the Property's period of significance, the proposed project would impact a greater number of contributing buildings and features than the Beverly Hilton Specific Plan 2008 EIR identified for the Beverly Hilton Specific Plan. However, in comparison to existing conditions, both buildout of the Existing Specific Plans and the proposed project would result in demolition of the same number of contributing buildings and features. Therefore, the significant and unavoidable historical resources impact of the proposed project would not be more severe than that of the Existing Specific Plans. Under both scenarios, despite the fact that Wilshire Tower may qualify for historic designation as an individual resource, the integrity of the Beverly Hilton property as a collection of buildings would be degraded such that it would be ineligible for listing in the CRHR.

As detailed above, the redistribution of previously approved FARs throughout the project site as part of the Overlay Specific Plan would result in the construction of six buildings on the project site, ranging from 20 to 410 feet in height. Historically, the Beverly Hilton property had three primary

views from the three major primary thoroughfares that surrounded it. As noted above, the views from these thoroughfares to the Wilshire Tower and views from the Wilshire Tower are therefore of major importance in Hilton hotels from this era and are a notable character-defining feature of the genre. The first of these views was lost following completion of the Waldorf-Astoria under the Approved Specific Plan (Figure 24). The construction of the buildings noted above would collectively diminish views both to and from the Wilshire Tower, thereby altering its setting and resulting in an impact to historical resources, the Beverly Hilton property (Figure 25). However, the Overlay Specific Plan would not result in increased view impacts when compared to that previously approved under the Existing Specific Plans. While it would construct buildings taller than those previously approved, the buildings proposed as part of the Overlay Specific Plan are further physically separated from Wilshire Tower, the only contributing building that would remain on the Beverly Hilton property following implementation of the proposed project. While character-defining views would be impacted under the Overlay Specific Plan, the scale, massing and siting of the proposed buildings would not impact character-defining views to a greater extent than that which was already approved under the Existing Specific Plans.

Although not capable of reducing impacts to below a level of significance, two mitigation measures have been identified to reduce the proposed project's impacts to historical resources. Mitigation Measures MM CR-5 and MM CR-6 below seek to expand knowledge of the property's social and cultural history and convey that knowledge to the general public. Implementation of Mitigation Measures MM CR-5 and MM CR-6 would reduce impacts to the historical resources; however, impacts would remain significant and unavoidable, similar to the Existing Specific Plans.

While the Beverly Hilton property as a whole would no longer meet the integrity requirements for NRHP listing, CRHR listing, or as a City of Beverly Hills landmark following implementation of the propose project, Wilshire Tower has the potential to individually warrant such designation following buildout of the proposed project. It is the visual centerpiece of the Beverly Hilton property and may independently meet NRHP and CRHR Criteria A/1, B/2 and C/3 and several of the criteria outlined in BHMC 10-3-3212(A). Therefore, the City of Beverly Hills and the owner of the Beverly Hilton property should consider the designation of Wilshire Tower as a local landmark.

Previous environmental documents prepared in support of the Existing Specific Plans accounted for impacts to the potentially historic streetlights surrounding the project site. The research conducted for this study indicates that these potentially historic streetlights no longer remain. The Overlay Specific Plan does not propose any alteration or modification to existing streetlights in the vicinity of the project site. However, if alteration and/or replacement of the existing streetlights in the vicinity of the project site is later proposed, this study recommends that any necessary replacement be undertaken in-kind.

LACC

EXISTING CONDITIONS

The City of Beverly Hills acting as the CEQA lead agency for the current project determined properties abutting the project site should be assessed for potential historical resources impacts. The LACC property is located immediately adjacent to and shares roughly the southern 0.2 miles of its eastern property boundary (which is over 1.2-mile-long) with the proposed project site. The current study confirmed the LACC property is eligible for NRHP and CRHR listing and is therefore considered a historical resource for the purposes of CEQA. The following analysis is included in this

study to ensure the potential impacts of the proposed project on properties immediately adjacent to the project site were adequately considered.

The proposed project would not physically demolish, deconstruct, relocate or alter directly any portion of the LACC property. All project components proposed as part of the Overlay Specific Plan would be constructed on the project site, which is adjacent to and outside the boundaries of the LACC property, specifically the South Course. As discussed above, the significance of the LACC is tied to its role in the early recreation history of the city of Los Angeles (Criteria A/1) and as a notable example of golf course design (Criteria C/3). The physical characteristics which convey this significance are tied to the property itself, including but not limited to its two 18-hole golf courses, varied topography and landscaping, and clubhouse. None of these character-defining features would be directly altered by the proposed project in any way. The proposed buildings may cast a shadow on a portion of the property. However, potential shadows are confined to a small portion of the South Course, which is eligible for historic designation only under Criterion A/1 making the details of its physical characteristics less essential in its ability to convey historic significance. Despite potential shadows, the South Course would retain the features that define its character under Criterion A, for example its function as a golf course, its varied topography and natural drainage features for example. Additionally, the shadow analysis conducted in support of the Initial Study for the project indicates that the project would not result in prolonged periods of shade and shadow on the property (City of Beverly Hills 2020). Increased shade on the property would not alter any of its character-defining features such that they would be materially impaired. Additionally, potential impacts as a result of increased shade on the property are limited to a small portion of the over 300-acre property and would not impact the property's overall character.

The proposed project would affect the property's immediate surroundings. However, alterations to the property's surroundings would not materially impair the significance of the LACC. As discussed throughout this study, the demolition and construction of several buildings throughout the project site would occur as a result of the proposed project. In addition to buildings sited further west on the project site, the Overlay Specific Plan would construct three buildings, the Wilshire Building, Garden Residence and Santa Monica Residence, along the western edge of the project site in the immediate vicinity of the LACC property, more specifically adjacent to the South Course. The heights of these proposed buildings are 124, 369 and 420 feet, respectively (Figure 26 and Figure 27).

When the LACC was initially developed in its current location in 1911, the surrounding environment included little development. However, by 1928, the end of the period of significance established for the property, its vicinity had been substantially developed, primarily with single-family residential and supportive commercial development. Following the period of significance, the integrity of the property's setting outside of its boundaries progressively changed as the area continued to densify. Today it may be characterized as densely developed and urban in nature.

Regardless of the changes which occurred to surrounding setting since 1928, the LACC property retains sufficient integrity to convey its significance and qualify for NRHP and CRHR listing. While the property retains integrity of setting, feeling, and association, this integrity is largely reliant on the property's character within its boundaries. Its size and inward-facing nature are such that the larger setting outside the boundaries of the property are less essential in its ability to convey significance. The property's surroundings have been significantly altered since the period of significance and the addition of the buildings proposed as part of the Overlay Specific Plan would not result in the alteration of the property's current setting such that its significance would be materially impaired.

There are two locations in the property's immediate vicinity where tall buildings (skyscrapers) are clustered, along Santa Monica Boulevard directly across from its southern boundary and on Wilshire

Boulevard, west of the LACC entrance. Along Santa Monica Boulevard between Avenue of the Stars and Moreno Drive, directly across the street from the property's southern boundary, are five buildings, the estimated heights of which from east to west are 480, 230, 365, 390 and 170 feet for an average height of 327 feet (Figure 28). On Wilshire Boulevard roughly 0.25 miles or 1,400 feet west of the LACC entrance are several buildings that are an estimated 250-300 feet tall.

The visibility of the buildings described above is variable from within the property's boundaries, depending on the vantage point. However, throughout the entirety of the South Course, the buildings lining Santa Monica Boulevard are highly visible. Additionally, aside from those specifically mentioned above, there are many other tall buildings located outside the immediate vicinity of the property that are also variously visible from within its boundaries. The buildings proposed as part of the Overlay Specific Plan are consistent in their height, scale and massing with development already existing along Santa Monica Boulevard in the vicinity of the project site. Therefore, the addition of the proposed buildings would only minimally alter the property's setting. In addition, due to the size of the LACC property, potential impacts to its setting are localized and while the construction of the proposed buildings may alter a portion of the property's setting, the project would not significantly impact the property's overall setting. Further, the most impacted portion of the LACC would be the South Course and impacts would be less than significant. The proposed project would result in a less than significant impact to historical resources (the LACC property) and no mitigation measures are recommended.

APPROVED ENTITLEMENTS

Potential impacts of the proposed project on the LACC property as a historical resource were not considered in previous environmental documentation prepared in support of the Existing Specific Plans. The Overlay Specific Plan would construct taller buildings located in closer proximity to the LACC property when compared to those approved by the Existing Specific Plans. However, in comparison to the 9900 Wilshire Specific Plan, which concentrated building massing in the North and South Buildings parallel to nearly the full extent of the LACC property boundary, the project's proposed building massing would be distributed across three buildings, breaking up building massing along the LACC boundary. Nonetheless, as discussed above, while these proposed buildings would alter the immediate surroundings of the LACC property, they would not result in material impairment of the property's significance and impacts to the property as a historical resource would be less than significant.

Figure 26 Overview of Area Where Proposed Project Would be Visible



Figure 27 Close up View of Area Where Proposed Project Would be Visible



Figure 28 View from the North Course of Buildings that Line Santa Monica Boulevard



6.2 Archaeological Resources Impacts

Existing Conditions

The CHRIS and SLF searches conducted for this study failed to identify any archaeological resources within the project site or a 0.25-mile radius around it. The archaeological field survey of 9900 Wilshire Boulevard, the only undeveloped portion of the project site, indicated that this portion of the project site is highly disturbed due to historical construction and recent demolition activities. The remainder of the project site is developed with buildings and paved surfaces such as parking lots and sidewalks. These surfaces have been previously graded, disturbed, and developed, and no archaeological resources are known to have been discovered. As a result of the conditions summarized above, the likelihood of encountering undisturbed archaeological resources is unlikely.

Approved Entitlements

Previous environmental documentation concluded that no known archaeological resources or human remains exist on the project site or its vicinity but excavation of the project site could potentially disturb unknown archaeological resources and/or human remains, resulting in a potentially significant impact to such resources (City of Beverly Hills 2008a and 2016). As discussed above, the project site has been previously graded, disturbed, and/or developed, and no archaeological resources are known to have been discovered. Similar to the Existing Specific Plans, and as a result of the conditions summarized above, the likelihood of encountering undisturbed archaeological resources is unlikely.

6.3 Mitigation Measures/Best Management Practices

Rincon recommends the following mitigation measures to reduce project related impacts to historical resources. Following Mitigation Measures MM CR-5 and MM CR-6 are three best management practices recommended by Rincon to ensure that potential impacts to unanticipated archaeological resources to a less than significant level.

6.3.1 Built Environment Mitigation Measures

CR-5 Oral Histories

Because the period of significance for the property is relatively modern (1955-1966), efforts shall be made to document oral histories of individuals who have relevant knowledge and experience with the cultural and social history of the property during this time period. Individuals with valuable institutional knowledge of the property should be interviewed to capture this history before it is lost forever. Outreach shall be conducted to identify a maximum of two individuals to complete interviews, not to exceed one hour each. Outreach should include but not be limited to coordination with the Hilton Worldwide Holdings, Inc. (formerly Hilton Hotels Corporation) and former associates and/or family of Welton Becket. Interviews shall be conducted using audio and/or video documentation and shall be transcribed. The resulting interview materials shall be offered to a minimum of two local organizations such as the Beverly Hills Historical Society and the Beverly Hills Public Library (Historical Collection).

CR-6 Interpretive Plaque

An interpretive plaque discussing the history of the property, its significance, and its important details and features shall be installed at the site. The plaque shall be installed by the project proponent prior to issuance of building occupancy permits on a publicly accessible building or in a publicly accessible outdoor location on the project site. The plaque shall include images and details from the previously prepared HABS documentation, oral histories, and any collected research pertaining to the historic property. The content shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History (NPS 1983). Installation of the plaque shall be completed within one year of the date of completion of construction of the proposed project.

6.3.2 Archaeological Best Management Practices

Retain a Qualified Archaeologist

A qualified archaeologist who meets or exceeds the Secretary of Interior's Professional Qualifications Standards for archaeology should be retained to carry out all mitigation measures pertaining to archaeological resources.

Unanticipated Discovery of Archaeological Resources

If cultural resources are encountered during ground-disturbing activities, work in the immediate area should be halted and the qualified archaeologist should evaluate the resource in consultation with the Native American monitor. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for California Register of Historical Resources or National Register of Historic Places eligibility. If the City of Beverly Hills, in consultation with the qualified

archaeologist, determines that the discovery is significant and cannot be avoided by the proposed project, additional work such as data recovery excavation should be completed prior to the resumption of ground-disturbing activities in the immediate area to mitigate any significant impacts to cultural resources.

Unanticipated Discovery of Human Remains

If human remains are found, State of California Health and Safety Code, Section 7050.5, states that no further disturbance should occur until the County Coroner has made a determination of origin and disposition pursuant to California Public Resources Code, Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant. The most likely descendant should complete the inspection of the site within 48 hours of being granted access and provide recommendations for the treatment of the remains.

6.4 Conclusions

The City retained Rincon to conduct a cultural resources study for the proposed One Beverly Hills Overlay Specific Plan. The Overlay Specific Plan is proposed for application to the 17.4-acre project site. It would allow for the comprehensive and coordinated redevelopment of the project site and would result in the select demolition and alteration of existing buildings and the development of six buildings, in addition to small-scale features and gardens, on the project site. It would act as a standalone planning document and would not negate the Existing Specific Plans.

The purpose of this study was to identify cultural resources that have the potential to be impacted by the proposed project. Rincon identified two historical resources with the potential to be impacted by the proposed project, the Beverly Hilton property and the LACC property. This study indicates that the proposed Overlay Specific Plan would result in significant impacts to the Beverly Hilton property despite implementation of Mitigation Measures MM CR-5 and MM CR-6; however, the proposed project would not result in new or more severe significant impacts as compared to buildout envisioned under the Existing Specific Plans. This study indicates further that the proposed Overlay Specific Plan would result in less than significant impacts to the LACC property.

While the Beverly Hilton property as a whole currently remains eligible for listing in the CRHR and local designation, it is no longer eligible for listing in the NRHP due to considerations of integrity. Following buildout of the proposed project, the Beverly Hilton property as a while would no longer remain eligible for listing in the CRHR or local designation. However, following buildout of the proposed project the Wilshire Tower may be eligible as an individual resource for listing in the NRHP, CRHR and local designation. Therefore, it is recommended that the city and the owner of the Beverly Hilton Property collaborate on the local historic designation of Wilshire Tower. Additionally, although no modification to existing streetlights surrounding the project site is currently proposed as part of the Overlay Specific Plan, if modification of these features is later proposed, it is recommended that any necessary replacement be undertaking in kind with existing streetlights.

Rincon recommends implementation of Mitigation Measures MM CR-5 and MM CR-6 above to reduce impacts to built environment resources and the three best management practices noted above to ensure that project impacts to archaeological resources are less than significant.

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Appendix A

CHRIS Records Search Results

CHRIS Information Center Records Search Data Sheet

Project Name: Beverly Blvd

Project Number: 17-04896 Date: 3/7/2018

Information Center: SCCIC

Search Radius: Half Mile: _____ One Mile: _____ Other: 1/4 Mile

USGS Quadrangle: Beverly Hills

Public Land Survey System (PLSS): Township: 1S Range: 15W Section: 23, 24

County: LA Co.

Previously Recorded Sites: 16

Previous Studies: 19

National Register of Historic Places:	Copies:	Y	N
California Register of Historical Resources:	Copies:	Y	N
California Points of Historical Interest:	Copies:	Y	N
California Historical Landmarks List:	Copies:	Y	N
Archaeological Determinations of Eligibility:	Copies:	Y	(N)
California Historical Resources Inventory:	Copies:	(Y)	N

Historic Maps:

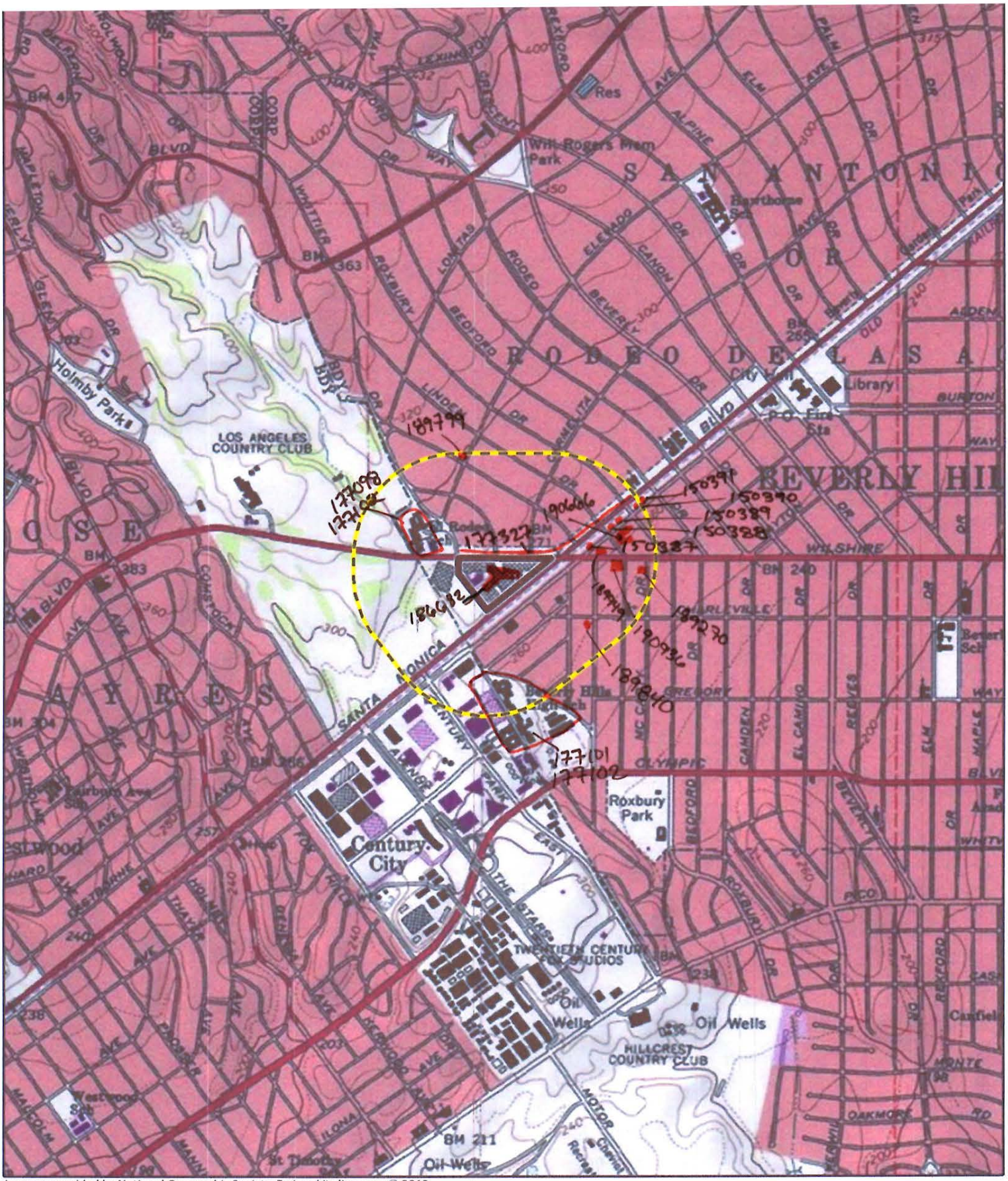
Notes:

Berverly Blvd #17-04896 LA County

Resources	Within	Adjacent	Outside	ADOE
186682	X			
177098		X		(on Hist Prop Data file p.53)
~~177102~~			X	
177102			X	(on HRI p.53)
177327		X		
189799			X	
177101			X	(HRI p.51)
~~177102~~			X	
189840			X	
190936			X	
189270			X	
150387			X	
150388			X	
150389			X	
150390			X	
150391			X	
189949			X	
190666			X	

Berverly Blvd #17-04896 LA County

Reports	Within	Adjacent	Outside
6133	x		
5013			x
9635			x
11443			x
1968		x	
12795			x
11574			x
11366			x
5189			x
3765		x	
12371		x	
12372		x	
12113			x
✓ 11642	x	x	x
✓ 11785	x	x	x
3678		x	
3679		x	
3680		x	
11005		x	



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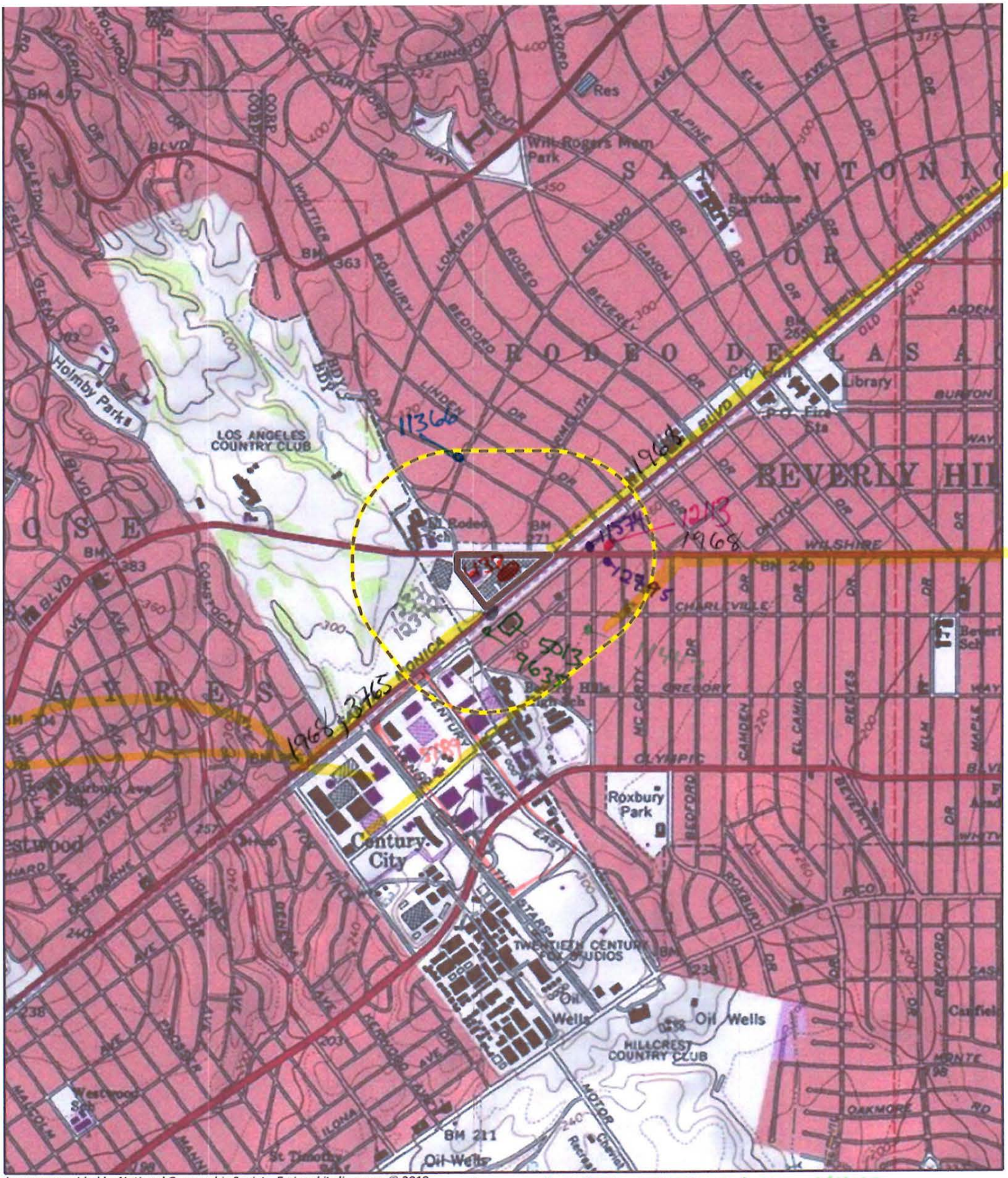
Beverly Hills Quadrangle. T01S R15W S23,24.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

Beverly Blvd
17-04896

Resources



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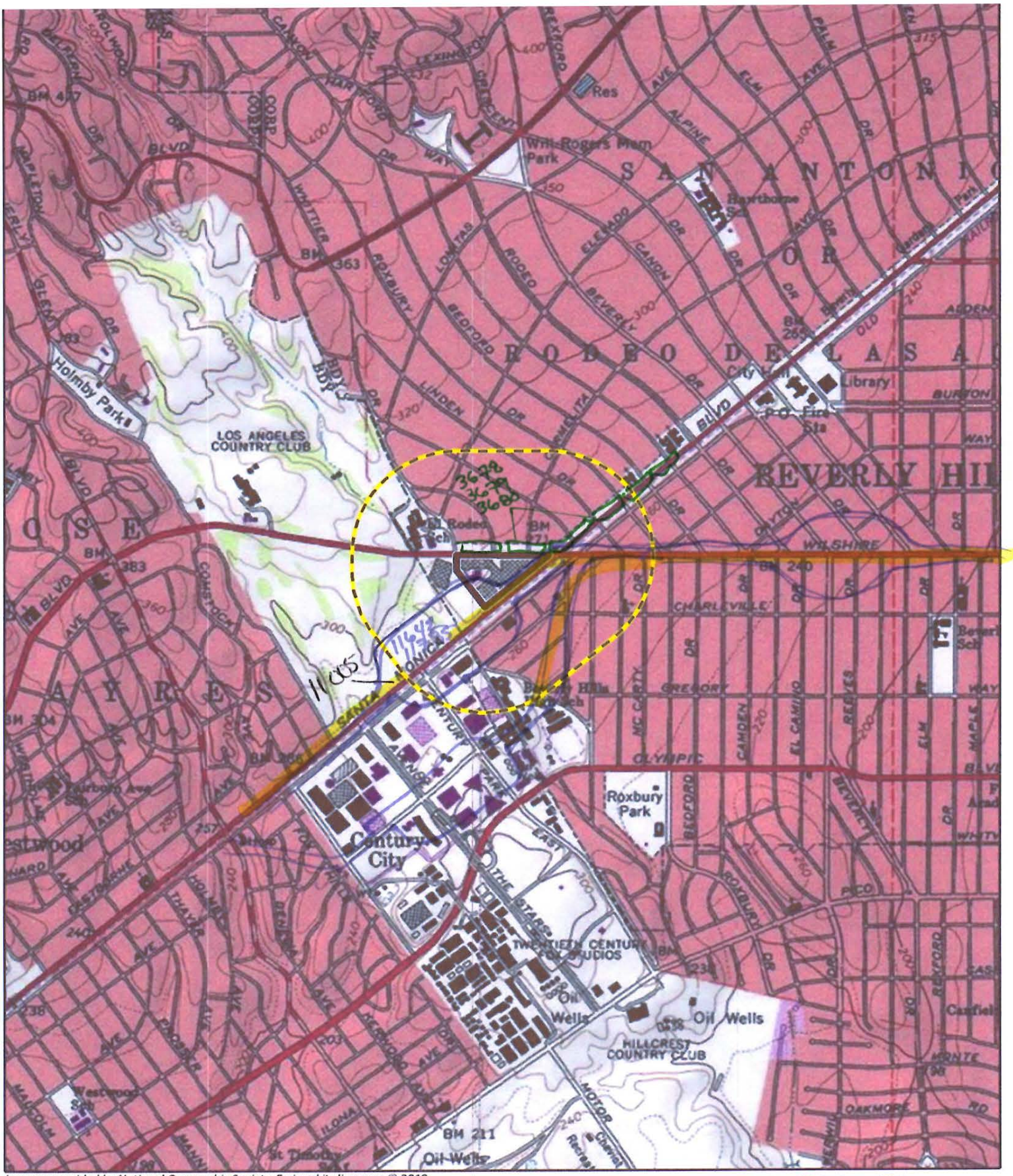
Beverly Hills Quadrangle. T01S R15W S23,24.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

Beverly Blvd 17-04896
Reports p.10f2



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Beverly Hills Quadrangle. T01S R15W S23,24.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

11642, 11785, 3678, 3679, 3680

11005

Beverly Blvd 17-048906 Reports p.2

Project Boundary

Quarter-Mile Buffer

N

0 1,000 2,000 Feet

0 250 500 Meters

Report List

Beverly Blvd #17-04896

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-01968	Paleo -	1989	Bissell, Ronald M.	Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los, Angeles, Los Angeles County, California	RMW Paleo Associates, Inc.	19-000159, 19-001261
LA-03678			Anonymous	Request for Determination of Eligibility for Inclusion in the National Register of Historic Places	Unknown	
LA-03679			Anonymous	Request for Determination of Eligibility for Inclusion in the National Register of Historic Places	Unknown	
LA-03680			Anonymous	Request for Determination of Eligibility for Inclusion in the National Register of Historic Places	Unknown	
LA-03765			Casen, George	Historic Property Survey 07 La 02 P.m. 3.65/9.57 Route 405 to Fairfax Avenue Los Angeles County California 07204-051280	Department of Transportation	19-150387, 19-150388, 19-150389, 19-150390, 19-150391
LA-05013		1999	Gray, Deborah	Cultural Resource Assessment for the At&t Wireless Services Facility Number C310.2, County of Los Angeles, Ca	LSA Associates, Inc.	
LA-05189		2001	Holson, John	Archaeological Survey and Record Search for Worldcom 1901 Avenue of the Stars, Century City Loop Project	Pacific Legacy, Inc.	
LA-06133		2002	Duke, Curt	Revised Cultural Resource Assessment Cingular Wireless Facility No. Sm 152-01 Los Angeles County, California	LSA Associates, Inc.	
LA-09635		2008	Bonner, Wayne	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA33378A (Antiquarian), 4851 S. Alameda St., Los Angeles, Los Angeles County, California.	Michael Brandman Associates	19-002884, 19-002885, 19-002943, 19-186110, 19-188179, 19-188223, 19-188468

Report List

Beverly Blvd #17-04896

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-11005		2010	Unknown, Mr./Mrs.	Westside Subway Extension Historic Property Survey Report and Cultural Resources Technical Report	Cogstone	19-167175, 19-167579, 19-167580, 19-167596, 19-168245, 19-168608, 19-170997, 19-171001, 19-171030, 19-173043, 19-173051, 19-173428, 19-174110, 19-174178, 19-175235, 19-175237, 19-176757, 19-176758, 19-177029, 19-177101, 19-177313, 19-177314, 19-177320, 19-177904, 19-178102, 19-178105, 19-178106, 19-188522, 19-189247, 19-189248, 19-189249, 19-189250, 19-189251, 19-189252, 19-189253, 19-189254, 19-189255, 19-189256, 19-189257, 19-189258, 19-189259, 19-189260, 19-189261, 19-189262, 19-189263, 19-189264, 19-189265, 19-189266, 19-189267, 19-189268, 19-189269, 19-189270, 19-189271, 19-189272, 19-189273, 19-189274, 19-189275, 19-189276, 19-189277, 19-189278, 19-189279, 19-189280, 19-189281, 19-189282, 19-189283, 19-189284, 19-189285, 19-189286, 19-189287, 19-189288, 19-189289, 19-189290, 19-189291, 19-189292, 19-189293, 19-189294, 19-189295, 19-189296, 19-189297, 19-189298, 19-189299, 19-189300, 19-189301, 19-189302, 19-189303, 19-189304, 19-189305, 19-189306, 19-189307, 19-189308
LA-11366		2011	Loftus, Shannon	Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment, AT&T Site:EL0459-4, 700 Walden Drive, Beverly Hills, Los Angeles County, California 90210 CASPR# 3551016879	ACE Environmental, LLC	19-150387, 19-150388, 19-150389, 19-177327, 19-189799
LA-11443		2011	Loftus, Shannon	Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment. AT&T Site: EL0459-10. 211 South Spalding Drive Beverly Hills, Los Angeles County, California 90210. CASPR#3551016879	ACE Environmental	19-150387, 19-150388, 19-150389, 19-177101, 19-177327, 19-186682, 19-189840

Report List

Beverly Blvd #17-04896

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-11574		2011	Bonner, Wayne	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Facility LAC681-01, USID 11934 (Santa Monica/Wilshire), 9777 Wilshire Boulevard, Beverly Hills, Los Angeles County, California	Environmental Assessment Specialists	19-177098, 19-177102, 19-177308, 19-186682, 19-187723, 19-189949
LA-11642		2012	Daly, Pam and Sikes, Nancy	Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports	Cogstone	19-000159, 19-001261, 19-002563, 19-002610, 19-003169, 19-003336, 19-003338, 19-003339, 19-003340, 19-003352, 19-003353, 19-003683, 19-004112, 19-004113, 19-004174, 19-004192, 19-004193, 19-100882, 19-150194, 19-150195, 19-167175, 19-170997, 19-170998, 19-171001, 19-173043, 19-173045, 19-173051, 19-173428, 19-174110, 19-175235, 19-175237, 19-177029, 19-177101, 19-177312, 19-177313, 19-177314, 19-177320, 19-186804, 19-187307, 19-187308, 19-188522, 19-188524, 19-189247, 19-189249, 19-189250, 19-189253, 19-189262, 19-189263, 19-189267, 19-189268, 19-189269, 19-189270, 19-189273, 19-189274, 19-189304, 19-189305, 19-189306, 19-189308, 19-189313, 19-189314, 19-189315, 19-189316
LA-11785		2012	Rogers, Leslie	Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension	U.S. Department of Transportation Fedreral Transit Admin. & LA County Metro Transit Authority	
LA-12113		2012	Bonner, Wayne and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV00283A (LA283 Beverly Hills Triangle Med), 9725 Wilshire Boulevard, Beverly Hills, Los Angeles County, California	MBA	19-177098, 19-177102, 19-177308, 19-177337, 19-186682
LA-12371		2013	Bonner, Wayne and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAC310 (Santa Monica/Wilshire), 9949 Santa Monica Boulevard, Beverly Hills, Los Angeles County, California	EAS	19-150387, 19-177098, 19-177337, 19-186682, 19-187799, 19-189840

Report List

Beverly Blvd #17-04896

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-12372		2013	Bonner, Wayne and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAC310 (Santa Monica/Wilshire), 9949 Santa Monica Boulevard, Beverly Hills, Los Angeles County, California	EAS	19-150387, 19-177098, 19-177337, 19-186682, 19-189799, 19-189840
LA-12795		2013	Bonner, Wayne and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for T Mobile West, LLC Candidate SV12838B (Beverly Hills Relo) 9740 Wilshire Boulevard, Beverly Hills, Los Angeles County, California	EAS	19-177098, 19-177102, 19-177308, 19-177337, 19-186682, 19-190936

Resource List

Beverly Blvd #17-04896

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-150387		Resource Name - La Dolce Vitae	Building	Historic	HP06 (1-3 story commercial building)	1993 (J. Snyder, Caltrans)	LA-03765, LA-09675, LA-11361, LA-11363, LA-11364, LA-11365, LA-11366, LA-11369, LA-11375, LA-11431, LA-11440, LA-11443, LA-11448, LA-11668, LA-12371, LA-12372
P-19-150388		Resource Name - 9731-9751 Santa Monica Blvd	Building	Historic	HP06 (1-3 story commercial building)	1993 (J. Snyder, Caltrans)	LA-03765, LA-11361, LA-11363, LA-11364, LA-11365, LA-11366, LA-11369, LA-11375, LA-11431, LA-11440, LA-11443, LA-11448, LA-11668
P-19-150389		Resource Name - 9701-9725 Santa Monica Blvd	Building	Historic	HP06 (1-3 story commercial building)	1993 (J. Snyder, Caltrans)	LA-03765, LA-09675, LA-11361, LA-11363, LA-11364, LA-11365, LA-11366, LA-11369, LA-11375, LA-11431, LA-11440, LA-11443, LA-11448, LA-11668
P-19-150390		Resource Name - 9683-9689 Santa Monica Blvd	Building	Historic	HP06 (1-3 story commercial building)	1993 (J. Snyder, Caltrans)	LA-03765
P-19-150391		Resource Name - The Gap	Building	Historic	HP06 (1-3 story commercial building)	1993 (J. Snyder, Caltrans)	LA-03765
P-19-177098		OHP Property Number - 027774; Resource Name - El Rodeo School; Other - El Rodeo de Las Aguas School; Other - Beverly Hills Schools Thematic Grouping	Building	Historic	HP15 (Educational building)	1994 (C. Widell)	LA-09675, LA-11574, LA-12113, LA-12371, LA-12372, LA-12795

Resource List

Beverly Blvd #17-04896

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-177101		OHP Property Number - 027777; Resource Name - Beverly Hills High School; Other - Beverly Hills Schools thematic District; Other - WSE 55	Building	Historic	HP15 (Educational building)	1994; 2010; 2011 (Pam Daly, Cogstone)	LA-11005, LA-11440, LA-11443, LA-11642, LA-12110
P-19-177102		OHP Property Number - 027778; Resource Name - Beverly Hills Schools; Other - Thematic Grouping	District	Historic	HP15 (Educational building)		LA-11376, LA-11574, LA-12004, LA-12110, LA-12113, LA-12522, LA-12560, LA-12724, LA-12795
P-19-177327		OHP Property Number - 028003; Resource Name - Beverly Gardens Park District	District	Historic	HP29 (Landscape architecture); HP30 (Trees/vegetation); HP31 (Urban open space)	1985 (M. Lortie)	LA-11361, LA-11363, LA-11364, LA-11365, LA-11366, LA-11369, LA-11375, LA-11376, LA-11431, LA-11440, LA-11443, LA-11448, LA-11668
P-19-186682		Resource Name - Beverly Hilton Hotel	Building	Historic	HP05 (Hotel/motel)	2001 (N. Wallock, LSA)	LA-09675, LA-11369, LA-11440, LA-11443, LA-11574, LA-12113, LA-12371, LA-12372, LA-12795
P-19-189270		Resource Name - Perpetual Savings Plaza; Other - Pacific Mercantile Bank	Building	Historic	HP07 (3+ story commercial building)	2010	LA-11005, LA-11642
P-19-189799		Resource Name - ELO459-4 Light Pole	Structure	Historic	HP11 (Engineering structure)	2011 (Shannon L. Loftus, Ace Environmental)	LA-11366, LA-12372
P-19-189840		Resource Name - EL0459-10, Light Pole	Structure	Historic	HP11 (Engineering structure)	2011 (Shannon L. Loftus, ACE Environmental)	LA-11443, LA-12371, LA-12372
P-19-189949		Resource Name - Comerica Tower; Other - Beverly Hills Gateway Tower; Other - AT&T Mobility LLC LAC681-01/Santa Monica Wilshire	Building	Historic	HP07 (3+ story commercial building)	2011 (K.A. Crawford, Crawford Historic Services)	LA-11574

Resource List

Beverly Blvd #17-04896

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-190666		Resource Name - Beverly-Linden Medical Office Building; Other - T-Mobile West LLC SV00283A/LA283 Beverly Hills Triangle Med	Building	Historic	HP07 (3+ story commercial building)	2012 (K.A. Crawford, Michael Brandman Associates)	
P-19-190936		Resource Name - T-Mobile West LLC SV12838B (Beverly Hills Relo)	Building	Historic	HP07 (3+ story commercial building)	2013 (K.A. Crawford, Crawford Historic Services)	LA-12795

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-03525		1966	Chartkoff, Kerry and Joe Chartkoff	Ucas-092 Route 2 Freeway Los Angeles County West, Los Angeles, Beverly Hills	UCAS	
LA-09675		2008	Bonner, Wayne H. and Kathleen A. Crawford	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC, Candidate LAC310 (Santa Monica/Wilshire), 9949 Santa Monica Boulevard, Beverly Hills, Los Angeles County, California.	Michael Brandman Associates	19-150387, 19-150389, 19-177098, 19-186682

Appendix B

NAHC SLF Search Results and Native American Outreach

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

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Karuk

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Marshall McKay
Wintun

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William Mungary
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[**Vacant**]

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[**Vacant**]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

July 27, 2020

Rachel Perzel
Rincon Consultants

Via Email to: rperzel@rinconconsultants.com

Re: Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes §65352.3 and §65352.4, as well as Assembly Bill 52 (AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, One Beverly Hills Project, Los Angeles County

Dear Ms. Perzel:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties or projects.

Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

Public Resources Codes §21080.3.1 and §21080.3.2 requires public agencies to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources as defined, for California Environmental Quality Act (CEQA) projects.

The law does not preclude local governments and agencies from initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

Best practice for the AB52 process and in accordance with Public Resources Code §21080.3.1(d), is to do the following:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The NAHC also recommends, but does not require that lead agencies include in their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential affect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

    - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE, such as known archaeological sites;
    - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
    - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
    - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

    - Any report that may contain site forms, site significance, and suggested mitigation measures.

      All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.

3. The result of the Sacred Lands File (SFL) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the potential APE; and

5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event, that they do, having the information beforehand well help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,

Steven Quinn
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Tribal Consultation List
Los Angeles County
7/27/2020

Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393 Gabrieleno
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693 Gabrieleno
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St., #231 Gabrielino
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490 Gabrielino
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com

Gabrielino-Tongva Tribe
Charles Alvarez,
23454 Vanowen Street Gabrielino
West Hills, CA, 91307
Phone: (310) 403 - 6048
roadkingcharles@aol.com

Soboba Band of Luiseno Indians
Scott Cozart, Chairperson
P. O. Box 487 Cahuilla
San Jacinto, CA, 92583 Luiseno
Phone: (951) 654 - 2765
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Sections 65352.3, 65352.4 et seq. and Public Resources Code Sections 21080.3.1 for the proposed One Beverly Hills Project, Los Angeles County.

Rincon Consultants, Inc.

250 East 1st Street, Suite 1400
Los Angeles, California 90012

213 788 4842 OFFICE AND FAX

info@rinconconsultants.com
www.rinconconsultants.com

August 25, 2020

Gabrielino-Tongva Tribe
Att: Charles Alvarez
23454 Vanowen Street
West Hills, California 91307
Via Email: roadkingcharles@aol.com

Subject: Cultural Resources Study for the One Beverly Hills Specific Plan Project, Beverly Hills, Los Angeles County, California, California

Dear Mr. Alvarez:

Rincon Consultants, Inc. (Rincon) has been retained to conduct a cultural resources study for the One Beverly Hills Specific Plan Project (project), Beverly Hills, Los Angeles County, California. The proposed project would establish a new Overlay Specific Plan for the site encompassing 9850, 9876, 9900 and 9988 Wilshire Boulevard in Beverly Hills, California. Portions of the project site have been subject to previous environmental review, for the Beverly Hilton Specific Plan and the 9900 Wilshire Specific Plan and associated amendments.

This letter serves to inquire about your knowledge of potential cultural resources within the vicinity that may be impacted by the project. Rincon contacted the Native American Heritage Commission to request a Sacred Lands File (SLF) search of the project site and conducted a California Historical Resources Information System (CHRIS) record search. The SLF search was negative for sacred lands in the project vicinity and the CHRIS records search did not identify any Native American cultural resources within a 0.5-mile radius of the project. However, we are aware that the results of these searches do not negate the possibility of cultural resources existing within the project site. This letter is intended as informal outreach only and does not constitute notification under Assembly Bill 52 of 2014 (AB 52). Any AB 52 consultation will be carried out separately by the lead agency. A project location map depicting the project area is enclosed with this letter for your reference.

If you have knowledge of cultural resources that may exist within or near the project site, please contact me at (805) 762-4064 x114 or dmerrick@rinconconsultants.com. Thank you for your assistance.

Sincerely,
Rincon Consultants, Inc.

Dustin Merrick
Associate Archaeologist

Rincon Consultants, Inc.

250 East 1st Street, Suite 1400
Los Angeles, California 90012

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www.rinconconsultants.com

August 25, 2020

Soboba Band of Luiseño Indians
Att: Scott Cozart, Chairperson
P. O. Box 487
San Jacinto, California 92583
Via Email: jontiveros@soboba-nsn.gov

Subject: Cultural Resources Study for the One Beverly Hills Specific Plan Project, Beverly Hills, Los Angeles County, California, California

Dear Chairperson Cozart:

Rincon Consultants, Inc. (Rincon) has been retained to conduct a cultural resources study for the One Beverly Hills Specific Plan Project (project), Beverly Hills, Los Angeles County, California. The proposed project would establish a new Overlay Specific Plan for the site encompassing 9850, 9876, 9900 and 9988 Wilshire Boulevard in Beverly Hills, California. Portions of the project site have been subject to previous environmental review, for the Beverly Hilton Specific Plan and the 9900 Wilshire Specific Plan and associated amendments.

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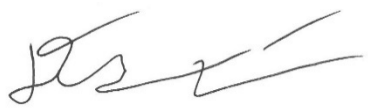

Dustin Merrick
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August 25, 2020

Gabrielino Tongva Indians of California Tribal Council
Att: Robert Dorame, Chairperson
P.O. Box 490
Bellflower, California 90707
Email: gtongva@gmail.com

Subject: Cultural Resources Study for the One Beverly Hills Specific Plan Project, Beverly Hills, Los Angeles County, California, California

Dear Chairperson Dorame:

Rincon Consultants, Inc. (Rincon) has been retained to conduct a cultural resources study for the One Beverly Hills Specific Plan Project (project), Beverly Hills, Los Angeles County, California. The proposed project would establish a new Overlay Specific Plan for the site encompassing 9850, 9876, 9900 and 9988 Wilshire Boulevard in Beverly Hills, California. Portions of the project site have been subject to previous environmental review, for the Beverly Hilton Specific Plan and the 9900 Wilshire Specific Plan and associated amendments.

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August 25, 2020

Gabrielino /Tongva Nation
Att: Sandonne Goad, Chairperson
106 1/2 Judge John Aiso Street, #231
Los Angeles, California 90012
Via Email: sgoad@gabrielino-tongva.com

Subject: Cultural Resources Study for the One Beverly Hills Specific Plan Project, Beverly Hills, Los Angeles County, California, California

Dear Chairperson Goad:

Rincon Consultants, Inc. (Rincon) has been retained to conduct a cultural resources study for the One Beverly Hills Specific Plan Project (project), Beverly Hills, Los Angeles County, California. The proposed project would establish a new Overlay Specific Plan for the site encompassing 9850, 9876, 9900 and 9988 Wilshire Boulevard in Beverly Hills, California. Portions of the project site have been subject to previous environmental review, for the Beverly Hilton Specific Plan and the 9900 Wilshire Specific Plan and associated amendments.

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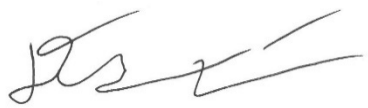

Dustin Merrick
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August 25, 2020

Gabrieleño/Tongva San Gabriel Band of Mission Indians
Att: Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, California 91778
Via Email: GTTribalcouncil@aol.com

Subject: Cultural Resources Study for the One Beverly Hills Specific Plan Project, Beverly Hills, Los Angeles County, California, California

Dear Chairperson Morales:

Rincon Consultants, Inc. (Rincon) has been retained to conduct a cultural resources study for the One Beverly Hills Specific Plan Project (project), Beverly Hills, Los Angeles County, California. The proposed project would establish a new Overlay Specific Plan for the site encompassing 9850, 9876, 9900 and 9988 Wilshire Boulevard in Beverly Hills, California. Portions of the project site have been subject to previous environmental review, for the Beverly Hilton Specific Plan and the 9900 Wilshire Specific Plan and associated amendments.

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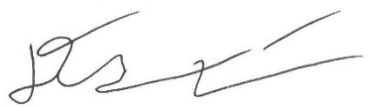

Dustin Merrick
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August 25, 2020

Gabrieleño Band of Mission Indians – Kizh Nation
Att: Andrew Salas, Chairperson
P.O. Box 393
Covina, California 91723
Via Email: admin@gabrielenoindians.org

Subject: Cultural Resources Study for the One Beverly Hills Specific Plan Project, Beverly Hills, Los Angeles County, California, California

Dear Chairperson Salas:

Rincon Consultants, Inc. (Rincon) has been retained to conduct a cultural resources study for the One Beverly Hills Specific Plan Project (project), Beverly Hills, Los Angeles County, California. The proposed project would establish a new Overlay Specific Plan for the site encompassing 9850, 9876, 9900 and 9988 Wilshire Boulevard in Beverly Hills, California. Portions of the project site have been subject to previous environmental review, for the Beverly Hilton Specific Plan and the 9900 Wilshire Specific Plan and associated amendments.

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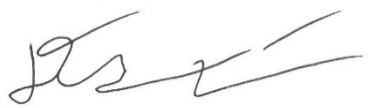
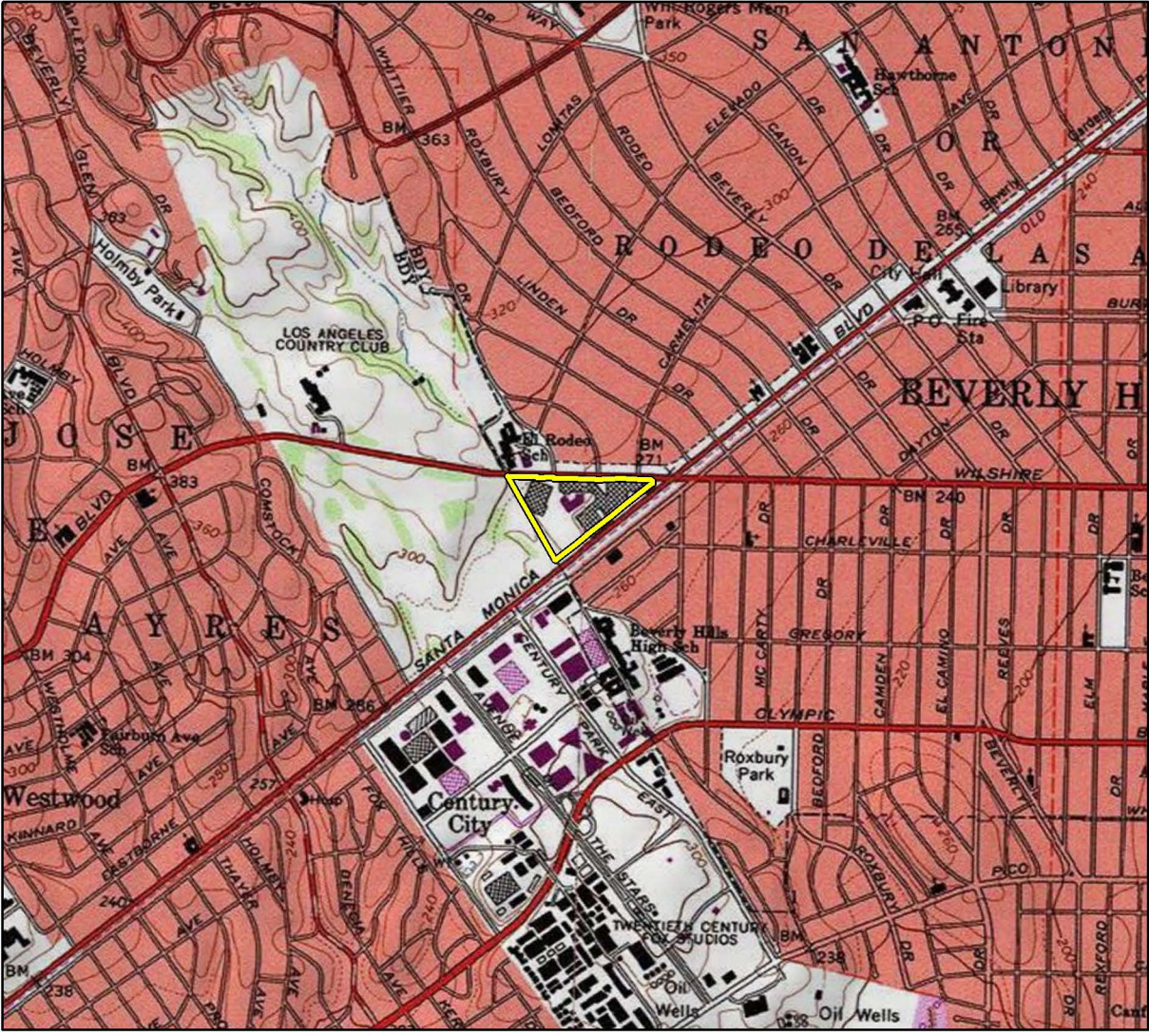


Dustin Merrick
Associate Archaeologist



Imagery provided by National Geographic Society, Esri and its licensors © 2020. Beverly Hills Quadrangle. T01S R15W S23,24. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may havechanged since the original topographic map was assembled.

Project Location

0 1,000 2,000 Feet

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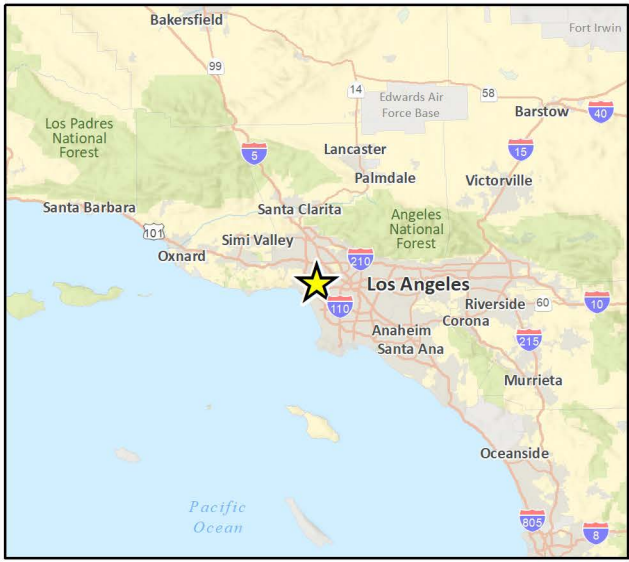


Appendix C

DPR Forms

***Recorded by:** S. Treffers and R. Perzel, Rincon Consultants Inc. ***Date:** September 4, 2020 ☐ Continuation ☑ Update
***NRHP STATUS CODE:** 3CS

***P3a. Description (update):**
Since the Beverly Hilton was last recorded in 2007, the following changes have occurred to the property:
- Demolition of the eastern portion of the Wilshire Edge building, including the Trader Vic's restaurant (2016-2017)
- Alteration and reconfiguration of the pedestrian courtyard along Wilshire Boulevard (2016-2017)
- Construction of the Waldorf Astoria building at the eastern terminus of the project site (2018)

***B10. Significance (update)**:
The Beverly Hilton property has been the subject of multiple historic resource evaluations. Each has recognized the cultural and architectural significance of the property for its important role in the social history of the Los Angeles area and for its importance as a distinctive work of the noted architectural firm of Welton Becket. As previously noted, the property was determined to retain sufficient integrity to be eligible for the NRHP and CRHR not only for its significant cultural (Criterion A/1) and architectural (Criterion C/3) associations, but also for its associations with Conrad Hilton (Criterion B/2). The period of significance for these associations was previously determined to be 1953 to 1955, which was derived using only the property's architectural significance under Criterion C/3 to recognize Beckett's original design intent for the property (Jones & Stokes 2007a). Contributing buildings and features under this period of significance included the Wilshire Tower, the Conference Center/Administrative and Retail Wings, and the pool. The parking garage, Lanai rooms, and Palm/Oasis Court were not considered character-defining features.

While this serves as the starting point for the current analysis, the current updated historical resources was completed in accordance with the guidelines of the California Office of Historic Preservation and to address changes that have occurred since the property was last recorded (California Office of Historic Preservation 1995). These include physical changes to the property, such as the demolition of the eastern portion of the Wilshire Edge building, the alteration and reconfiguration of the pedestrian courtyard, and construction of the Waldorf Astoria building at the eastern terminus of the property. The City of Beverly Hills has also adopted a Historic Preservation Ordinance since that time, which is considered and addressed as part of the current evaluation. Lastly, a number of the buildings on the property were not yet 50 years of age when they were last evaluated as part of the approved project, an age threshold that is typically used to assess historical significance (California Office of Historic Preservation 2006).

National and California Registers

As discussed further below, Rincon concurs that the Beverly Hilton property is significant under Criteria A/1, B/2, and C/3 of the NRHP and CRHR criteria, respectively, as previously determined in the 2008 FEIR for the Beverly Hilton Specific Plan. The period of significance for these important associations is 1953 through 1966. This differs from the 1953 through 1955 period of significance that was previously identified in 2008, which was derived using only the property's architectural significance under Criterion C/3 to recognize Becket's original design intent for the property. As described in further detail below, Rincon has extended the period of significance to 1966 to include buildings and features that reflect significant associations with cultural history and important individuals under Criteria A/1 and B/2. Demolitions and alterations that have occurred to the property since this time have negatively affected its integrity; therefore, the entirety of the property as a collection of buildings no longer appears eligible for NRHP listing.

Criterion A/1
Under Criterion A/1, the property demonstrates important associations with events that have made a significant contribution to local, state, and national history. It represents shifting concepts of the post-war hotel industry and the establishment of Hilton Hotel Corporation of one of the preeminent luxury hospitality brands during this period. As described by HRG, it was the "flagship for a new era of hotels" (Historic Resources Group 2006). Its importance was exhibited through its prominent and visible siting at a major intersection and strikingly Modernist design idiom. These features capitalized on the country's mass acceptance of the automobile after World War II and contributed to the hotel's popularity. Guests could see and be seen through Wilshire Tower's transparent façade, an important strategy in Hilton hotels, which became known as "machines for viewing" (Jones & Stokes 2007b). The views to and from the Wilshire Tower are therefore of major importance in Hilton hotels from this era and are a notable character-defining feature of the genre. Another innovation in hotel design embodied by the Beverly Hilton was the large number of function rooms it contained. These spaces were intentionally planned and expanded by Conrad Hilton and Welton Becket and made the hotel a popular location among the entertainment industry and Los Angeles society. While there were other notable hotels in Los Angeles, none offered the number or variety of function rooms that the Hilton contained. Throughout its history, these spaces hosted a number of prominent local and national events, including the annual Golden Globe Awards and other "industry" and political events.

Criterion B/2
The property is also significant under Criterion B/2 for its important associations with Conrad Hilton and Welton Becket. Both were notable and innovative individuals within their respective fields - Hilton, perhaps the most widely recognized hoteliers of the

twentieth century and Becket, an architect that helped define southern California's Modernist built environment. Jones & Stokes (2007a) discussed the importance of these two individuals and how the Beverly Hilton represented their significance to events in our past:

> "They both developed business methods (analyzing and quantifying both needs and responses to them to maximize efficiencies) to accommodate a new age, epitomized by the new jet-setting American business client and corporate executive. These parallel approaches converged at The Beverly Hilton, a pioneer in hotel architecture in which cunning economies permitted both lower room rates and a high standard of luxury."

Both individuals were demonstrably significant within the context of their respective fields, and the Beverly Hilton represents a notable collaboration and nexus between their innovative ideas.

Criterion C/3

The Beverly Hilton property is also significant under Criterion C/3 as the work of a master, Welton Becket, and for its embodiment of the distinctive characteristics of Mid-Century Modernism. As previously discussed, Becket was responsible for some of southern California's most iconic Modernist buildings, including Bullock's Pasadena (1947), Capitol Records tower (1954), and the Santa Monica Civic Auditorium (1958). The Beverly Hilton was built during some of Becket's most productive years and reflects his ability to respond to a unique project site and the needs of his client. The hotel was designed to become an "instant landmark" and ultimately became a prototype for other Hilton International hotels (Historic Resources Group 2006). Its location and prominence in the Hilton chain made the Beverly Hilton a prominent and nationally recognized work that was featured in national ad campaigns for Hilton Hotels.

The Beverly Hilton is equally important for its Mid-Century Modern architecture and design because it was completed by the firm during the first two phase of the complex's development. The main Wilshire Tower's distinctive Y-shape, prominent horizontality, early adoption of new building technologies and materials, low-key ornamentation, and open balconies are some of the key features of its Mid-Century Modern architecture. Becket's minimalistic modern design for the Beverly Hilton set the standard for the chain and defined a new model for hotel plan and design. The design of the Beverly Hilton was a key example and product of Becket's "total design" strategy to include the firm's comprehensive design and oversight of everything from the hotel buildings to the matches and napkins designed for the hotel.

Noted master architect Gin D. Wong was responsible for a 1989 renovation that resulted in changes to the interior public spaces. These alterations do not appear eligible under Criterion C/3. Wong was responsible for a number of projects in Beverly Hills, including the former Hilton Hotel Corporate office complex at 9336-9346 Civic Center Drive (1985), the Union 76 gas station (1965), and the office building at 100 North Crescent Drive (1989). Unlike his work at the Beverly Hilton, which was limited to renovation work, these other projects were conscious designs of complete buildings. Because there are better representations of Wong's work in Beverly Hills, the Beverly Hilton property does not appear significant for its association with Wong.

Period of Significance

The period of significance refers to the date or span of time during which significant events and activities occurred. The Jones & Stokes 2007 study determined that the Beverly Hilton property was significant under NRHP/CRHR Criteria A/1, B/2, and C/3. However, the period of significance was defined as 1953-1955, using only Criterion C/3 to address to capture the original design components.

Rincon concurs with the previous eligibility determination that the Beverly Hilton is significant not only for its architectural merit under Criteria C/3, but also under Criteria A/1 and B/2 for its association with cultural history and important individuals (i.e., Conrad Hilton and Welton Becket). These latter associations were not limited to the original design implemented from 1953 through 1955 but rather spanned into the 1960s as Hilton and Becket further developed the property. The passage of additional time since the property was last evaluated has further confirmed that the Lanai Rooms, Parking Garage, and Palm/Oasis Building represent this ongoing collaboration. These buildings were developed as part of the ongoing collaboration between Hilton and Becket and provided the additional space, functions, and services that made the Beverly Hilton an institution both in southern California and in its notable entertainment industry. According to the guidance of the National Park Service, the period of significance should be based on the specific events directly related to the significance of the property and should combine overlapping periods as one longer period of significance when a property possesses multiple significant associations (National Park Service 1997). The current analysis has therefore identified the period of significance to be 1953 through 1966, which captures not only the original design of the property, but also the later additions by Hilton and Becket, which directly contributed to the ongoing success and preeminence of the property.

Contributing Buildings and Features

The Beverly Hilton property contains a number of buildings and features that were constructed during the period of significance and contribute to its CRHR eligibility under Criteria 1, 2, and 3. Contributing buildings and features have been identified following NPS guidance. Per this guidance, "a contributing building, site, structure, or object adds to the historic associations [or] historic architectural quality… for which a property is significant because it was present during the period of significance, relates to the documented significance of the property, and possesses historic integrity…" (NPS 1997:16). Taking NPS guidance into account, the following buildings and features are those that contribute to the significance of the Beverly Hilton Property: Wilshire Tower, Wilshire Edge Building, Swimming Pool and Lanai Rooms, Vehicle Entry Courtyard, Palm/Oasis Court and Parking Garage.

To aid future planning efforts, it may be useful to identify which buildings and features of the Beverly Hilton property are most critical in its ability to convey historical significance. The property's contributing buildings and features have been divided into three tiers, primary, secondary and tertiary, according to their importance as it relates to the property's ability to convey significance. Those that are highly representative of the property's historical and architectural significance and most clearly embody all of its significant associations are considered the primary contributing buildings and features of the property. While secondary and tertiary buildings and features may also represent these associations, they do so to a lesser degree, either due to the quality of their design or the date of their construction. Secondary buildings are less characteristic of the Mid-Century Modern Style than is Wilshire Tower. However, these buildings were components of the property's initial design and therefore also clearly express its significant associations. Tertiary buildings and features are least important in the property's ability to convey significance. They were added to the property following its initial design and therefore, are not entirely essential in the property's ability to convey significance.

The Beverly Hilton Property is significant under multiple designation criteria, 1, 2 and 3. However, the property's buildings and features are variously representative of its significant associations. As the center piece of the Beverly Hilton Property, around which all contributing buildings and structures are oriented, Wilshire Tower is the property's primary contributing building. Its function as a hotel representative of the post-war hotel industry and the establishment of Hilton Hotel Corporation is most distinctly embodied in Wilshire Tower. With its high style, Wilshire Tower clearly expresses the collaborative relationship between Conrad Hilton and Master Architect Welton Becket and additionally embodies the principles of Mid-Century Modernism.

Secondary buildings and features of the Beverly Hilton Property are Wilshire Edge Building, Swimming Pool and the Vehicle Entry Courtyard. While these buildings and features are original to the property's design and convey significance, they clearly represent less of a design investment when compared to Wilshire Tower. Rather, they were designed to complement Wilshire Tower. When considered individually, these buildings and features integrate some of the principles of Mid-Century Modernism but certainly to a lesser degree than Wilshire Tower and are therefore considered secondary. The Parking Garage, Palm/Oasis Court and Lanai Rooms are the property's tertiary buildings and features. These buildings and features were designed in a manner consistent with those original to the property's design. However, they are later additions and are more minimal in terms of their style and detailing when considered individually and are therefore least important in the property's ability to convey significance.

Integrity

Since the property was last evaluated for historical significance in 2007, the property has undergone developments that have resulted in a number of changes to the property. These include:

- Demolition of the eastern portion of the Wilshire Edge building, including the Trader Vic's restaurant (2016-2017)
- Alteration and reconfiguration of the pedestrian courtyard along Wilshire Boulevard (2016-2017)
- Construction of the Waldorf Astoria building at the eastern terminus of the project site (2018)

When considered as a collection of buildings, the above noted changes have affected the integrity of the Beverly Hilton property. As discussed above, the Wilshire Edge Building was designed by Master Architect Welton Becket, was constructed during the period of significance and contributed to the significance of the Beverly Hilton property. The demolition of half of this feature has negatively affected the property's integrity of design, setting, materials, workmanship, feeling, and association. The construction of the highly visible Waldorf-Astoria at the eastern edge of the property has further affected its integrity. Wilshire Tower was intentionally designed to be highly visible from the surrounding area, particularly from the prominent intersection of Wilshire and Santa Monica Boulevards. This notable design feature remained throughout the 1960s additions to the property and later alterations from the 1980s. However, development of the approximately 15-story hotel at the edge of this intersection has visually obstructed views of Wilshire Tower from the north and east. These views are a character-defining feature of the property and their obstruction has therefore impacted the property's ability to convey its significance.

The previously noted alterations have affected the integrity of the Beverly Hilton property such that it no longer appears eligible for NRHP listing as a property or collection of buildings, which requires that a property retain sufficient integrity to convey its historic significance. However, the California OHP recognizes that although a property may not retain sufficient integrity to be eligible for the NRHP, it may still be eligible for the CRHR (California OHP 2006). Per this guidance, the Beverly Hilton property appears eligible for the CRHR because the following contributing buildings remain and Wilshire Tower remains visible from two of its three primary vantage points: Wilshire Tower, western half of the Wilshire Edge Building, Swimming Pool, Lanai Rooms, Vehicle Entry Courtyard, Palm/Oasis Court and Parking Garage. The Wilshire Tower may additionally qualify for listing in the NRHP, CRHR, and local designation as an individual resource.

Application of City Landmark (Significance) Criteria

The subject property does appear to meet the necessary City of Beverly Hills Landmark criteria (BHMC 10-3-3212) based on current research and the above assessment. The property was evaluated according to statutory criteria as listed under Section 2.3, *City of Beverly Hills*. The property meets the following criteria (BHMC 10-3-3212(A)):

BHMC 10-3-3212 (A)(1). *The property is over 45 years of age or is a property of extraordinary significance.*

Construction for the Beverly Hilton hotel began in 1953. Additions to the Beverly Hilton hotel, including the Lanai Rooms, Oasis/Palm Court and a large portion of the Parking Garage, were constructed in the 1960s. Therefore, the property satisfies this criterion.

BHMC 10-3-3212(A)(2). *The property possesses high artistic or aesthetic value and embodies the distinctive characteristics of an architectural style, architectural type, or architectural period.*

As a singular resource, the property possesses high artistic style and aesthetic value. Some of the buildings and features contributing to the subject property, for example Wilshire Tower, exhibit the distinctive elements of the Mid-Century Modern style as designed by the master architecture firm of Welton Becket and Associates, while secondary and tertiary features offer limited or no contribution to the Mid-Century design. Additionally, the property as a whole possesses aesthetic value due to its site layout and the interaction of its contributing elements. Therefore, the property satisfies this criterion.

BHMC 10-3-3212(A)(3). *The property retains substantial integrity from its period of significance.*
The property's period of significance is defined as 1953 to 1966. Since this time, the property has undergone a number of alterations, including renovations in 1989 and 2004, the demolition of the eastern Wilshire Edge building, and the construction of the Waldorf Astoria at the eastern terminus of the site. Although these changes have affected many aspects of the property's integrity, the property still retains a sufficient number of its contributing resources, character-defining features, and important viewsheds from its period of significance to meet this criterion.

BHMC 10-3-3212(A)(4). *The property has continued historic value to the community such that its designation as a landmark is reasonable and necessary to promote and further the purposes of this article.*
The property is an important representation of the City's unique and diverse architectural, commercial and cultural heritage dating from the post-war period. Therefore, it has historic value to the local community.
The property also appears to meet many of the criteria under BHMC 10-3-3212(B).

BHMC 10-3-3212(B)(1). *It is listed on the National Register of Historic Places.*
The subject property is not listed in the NRHP. Therefore, the property does not satisfy this criterion.

BHMC 10-3-3212(B)(2). *It is an exceptional work by a master architect.* The BHMC, which defines an "exceptional work" as the following:

"A remarkably superior example of architectural work that has been recognized as such by members of the architectural community. At a minimum, the work's exceptional quality shall have been documented by at least one of the following: a) it was the subject of a major architectural award; b) it was substantively discussed (i.e., not just mentioned) and photographically depicted in a monograph on a master architect's career; or c) it was substantively discussed or photographically depicted in at least two (2) publications (e.g., a book, treatise, trade magazine article, film, or set of photographs made available to the public by an institutional archive) authored by acknowledged experts in the field of architecture. A monograph of publication made available to the public solely in electronic form and without any reasonable expectation of compensation to the author, or substantially authored by the architect of the work, shall not count toward this minimum (BHMC 10-3-3202)."

In consideration of these criteria, as a whole the collection of buildings located on the subject property is an exceptional work as defined by the BHMC. As detailed above in Section 3.3, Historic Context, and Section 5.1.1.1, National and California Registers, the

contributing buildings and features on the subject property are an important work of Welton Becket and Associates, and the components constructed during the first phase of development were the subject of numerous awards and article spreads in historic magazines. Therefore, although buildings on the property satisfy this criterion to various degrees individually, the property satisfies this criterion. Although interior renovations were made by Gin D. Wong, a master architect, these changes are not considered an exceptional example of Gin D. Wong's work or of the Corporate Modern/Postmodern styles and have not acquired significance. In addition, Wong's renovations were substantially modified by Gensler designed renovations in 2004.

BHMC 10-3-3212(B)(3). *It is an exceptional work that was owned and occupied by a person of great importance and was directly connected to a momentous event in the person's endeavors or the history of the nation.*

The BHMC defines 'a person of great importance' as "a person whose activities had a substantial impact on the history of the nation, which impact can be demonstrated through scholarly research and judgment. At a minimum, a person of great importance is someone whose name and exploits were widely known across America during his/her lifetime, and whose widespread fame continues through to the present day. A person shall not be considered to be of great importance by virtue of his/her position or title, race, gender, ethnicity, or religion (BHMC Section 10-3-3202)." The subject property is considered an exceptional work that was owned by a person of great importance as defined by BHMC, Conrad Hilton. The endeavors of Conrad Hilton are associated with important post-war events in the history of the nation. He was also notable for his productive years as the developer and key representative of the Hilton Hotel and for developing methods in the hospitality industry to accommodate a new age. The subject property directly represents these associations and set a precedent for Hilton hotels in the post-war era. Therefore, the property satisfies this criterion.

BHMC 10-3-3212(B)(4). *It is an exceptional property that was owned and occupied by a person of great local prominence.*

The BHMC defines 'a person of great local prominence' as one "whose activities had such a substantial impact on the history of the city of Beverly Hills that a public street or public park in the city was named after him or her (BHMC Section 10-3-3202). As Conrad Hilton does not have a public street or public park in the city named after him, the property does not satisfy this criterion.

BHMC 10-3-3212(B)(5). *It is an iconic property.*
The BHMC defines as 'iconic property' as "property that has been visited and photographed so often by residents and visitors to the city that is has become inextricably associated with Beverly Hills in the popular culture and forms part of the city's identity to the world at large (BHMC Section 10-3-3202)." The Beverly Hilton is an iconic property as defined by the BHMC. It has been previously identified as significant in multiple evaluations and is located at a prominent location in Beverly Hills. Since its development in 1953, it has been a major hub for the entertainment industry and the site of numerous award ceremonies including the Golden Globes and other high-profile events. As a result, the property meets this criterion.

BHMC 10-3-3212(B)(6). *The landmark designation procedure is initiated, or expressly agreed to, by the owner(s) of the property. (Ord. 15-O-2682, eff. 11-19-2015)*
The Beverly Hilton property's landmark designation procedure has not been initiated or agreed to by the owners of the property. Therefore, the property does not satisfy this criterion

**B14. Evaluator:* Steven Treffers, Rincon Consultants
**B12. Date of Evaluation:* September 4, 2020

**B12. References*

California Office of Historic Preservation
1995 *Instructions for Recording Historical Resources*. California Department of Parks and Recreation, Sacramento.
2006 *California Register and National Register: A Comparison*. Technical Assistance Series, No. 6. California Department of Parks and Recreation, Sacramento.

Historic Resources Group, LLC (HRG)
2006 *Cultural Resources Technical Report, Beverly Hilton Redevelopment Plan, 9876 Wilshire Boulevard, Beverly Hills, CA 90210*. December. Prepared for Oasis West Realty, LLC, Beverly Hills, CA.

Jones & Stokes Associates (Jones & Stokes)
2007a *Cultural Resources Technical Document for the Beverly Hilton Revitalization Plan, Prepared in Support of the Draft Environmental Impact Report*. Prepared for the City of Beverly Hills, Beverly Hills, CA.
2007b City of Beverly Hills Historic Resources Survey Report, Survey Area 5: Commercial Properties. Prepared for the City of Beverly Hills, June 2006, rev. April 2007.

National Park Service
1997 *How to Complete the National Register Registration Form*. National Register Bulletin 16a. U.S. Department of the Interior, Washington D.C.

State of California -- The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary # _____
HR # _____
Trinomial _____
NRHP Status Code 3S
Other Listings _____
Review Code _____ Reviewer _____ Date _____

Page 1 of 1

* Resource Name or #: Beverly Hilton

P1. Other Identifier: _____

* P2. Location: ☐ Not for Publication ☑ Unrestricted a. County Los Angeles

b. USGS 7.5' Quad _____ Date _____ T____; R____; ____ 1/4 of ____1/4 of Sec____; _____ B.M.

c. Address 9876 Wilshire Blvd. City Beverly Hills Zip 90212

d. UTM: (Give more than one for large and/or linear feature) Zone _____, _____mE/ _____mN

e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTMs, etc. as appro

* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)
Appears to be eligible for the National Register under Criteria A, for it's association with imporant events, under Criterion B for it's association with Conrad Hilton, and under Criterion C, as an important example of the work of a master architectural firm, Welton Becket and Associates.

Original Owner: Hilton Hotels Corp.
Architect: Beckett; Welton
Builder: Webb; Del E. Construction Co.

* P3b. Resource Attributes: (List attributes and codes) _____

* P4. Resources Present: ☑ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)



P5b. Description of Photo: (View, date, etc.)
May 2006

* P6. Date Constructed/Age and Sources:
☐ Prehistoric ☑ Historic ☐ Both
1955 (Factual)Extensive press articles.

* P7. Owner and Address:

* P8. Recorded by: (Name, affiliation, address)
John English & Portia Lee
Jones & Stokes
811 W 7th ST, Suite 800
Los Angeles, CA 90017

* P9. Date Recorded: 6/9/2006

* P10. Survey Type: (Describe)

* P11. Report Citation: (Cite survey report/other sources or "none")

* Attachments: ☑ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☐ Building, Structure, and Object Record
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record
☐ Photograph Record ☐ Other: (List) _____

19-186682

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code
Other Listings
Review Code Reviewer Date

Page 1 of 4 *Resource Name or #: (Assigned by recorder) Beverly Hilton Hotel

P1. Other Identifier: None

*P2. Location: ☐ Not for Publication ☒ Unrestricted *a. County Los Angeles
and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Beverly Hills 1113 Date 1966 (PR 1972) T 1S ; R 16W ; unsectioned ; SB B.M.

c. Address 9876 Wilshire Boulevard City Beverly Hills Zip 90210

d. UTM: (Give more than one for large and/or linear resources) Zone 11S ; 369702 mE / 3770419 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate)
APN 4327-028-001

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
The Beverly Hilton is a seven story building with a Y-shaped mass, housing 581 guest rooms and 90 suites. Consistent with the International Style, the building lacks any applied texture, or unnecessary ornament. It was constructed with poured concrete, with tar and gravel roofing. The outward facing wall of each room is almost entirely composed of glass. Fenestration consists of metal frame fixed and sliding windows. Rooms facing south and east have balconies with steel railings that span the length of the room. Only the top story rooms facing north have balconies. Entry to the hotel is via large glass doors on the west elevation. The first story, west elevation, is composed almost entirely of plate glass. A portion of the entry is covered by a flat semi-circular planter supported by large cylindrical pillars. Although there have been changes made to the interior, the exterior remains unaltered since its construction in 1955. The hotel is in excellent condition.

*P3b. Resource Attributes: (List attributes and codes) HP5 (Hotel)

*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing: (Photo required for buildings, structures, and objects.)



P5b. Description of Photo: (View, data, accession #)
View to the north.

*P6. Date Constructed/Age and Sources:
☒ Historic
☐ Prehistoric ☐ Both
1955; property details

*P7. Owner and Address:
Grifftel/Beverly Holdings Inc. BVH
780 Avenue 3
New York, NY 10017-2024

*P8. Recorded by: (Name, affiliation, and address): Nicole Wallock and Judith Marvin
LSA Associates
1 Park Plaza, Suite 500
Irvine, California 92614

*P9. Date recorded: Dec. 11, 2001

*P10. Survey Type: (Describe)
Historic Architectural Evaluation

* P11. Report citation: (Cite survey report and other sources or enter "none.") Cultural Resource Assessment for Cingular Wireless Facility No. SM 152-01, January 2002

Attachments: None ☒Location Map ☐Sketch Map ☒Continuation Sheet ☒Building, Structure, and Object Record
☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record
☐Artifact Record ☐Photograph Record ☐Other (List)

DPR 523A (1/95) ***Required Information**

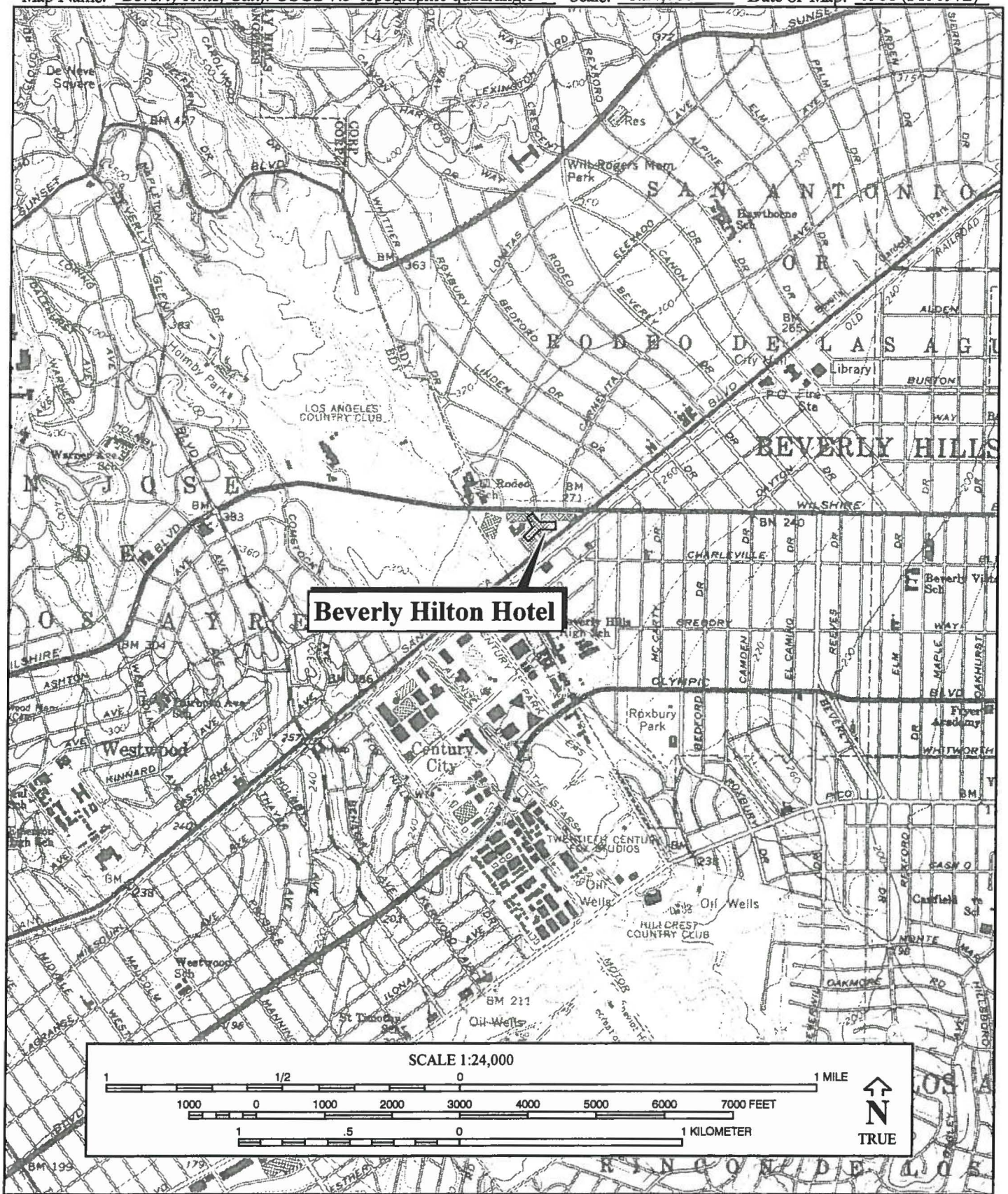
19-186682

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
LOCATION MAP

Primary # _____
HRI # _____
Trinomial _____

Page 2 of 4 *Resource Name or # (Assigned by recorder) Beverly Hilton Hotel

*Map Name: *Beverly Hills, Calif.* USGS 7.5' topographic quadrangle *Scale: 1:24,000 *Date of Map: 1966 (PR 1972)



DPR 523J (1/95) *Required Information

19-186682

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
BUILDING, STRUCTURE, AND OBJECT RECORD

Primary #
HRI#

NRHP Status Code 3S

*Resource Name or #: (Assigned by recorder) Beverly Hilton Hotel

B1. Historic Name: The Beverly Hilton Hotel
B2. Common Name: same
B3. Original Use: Hotel **B4. Present Use:** Hotel
***B5.** Architectural Style: International
***B6.** Construction History: (Construction date, alterations, and date of alterations)
The hotel was constructed in 1955, no exterior alterations were noted.

***B7.** Moved? ☒ No ☐ Yes ☐ Unknown Date: _____ Original Location: _____
***B8.** Related Features:
Parking structure and pool-side cabanas appear to be modern additions to the property.

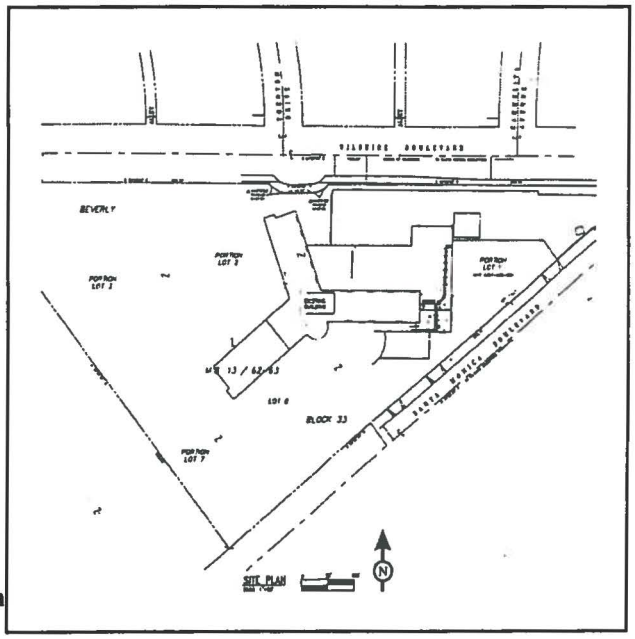
B9a. Architect: Welton Becket & Associates **b. Builder:** Conrad Hilton
***B10.** Significance: **Theme** Recreation and Entertainment **Area** Los Angeles
Period of Significance 1955 to present **Property Type** Hotel **Applicable Criteria** A, B, and C
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)
The Beverly Hilton Hotel, designed by the architectural firm of Welton Becket & Associates and built by Conrad Hilton, is an important example of the International architectural style and retains its integrity of location, design, setting, materials, workmanship, feeling, and association. The building appears eligible for listing in the National Register under Criteria A, B, and C. Under Criterion A, it is associated with the expansion of Los Angeles as a city, and as the center of the entertainment industry. Vice President Nixon delivered a speech at the dedication of the hotel in which he stated that this hotel will be a large part of what makes Los Angeles a metropolis. The first Grammy Awards (1958) was held at the Beverly Hilton, and the hotel currently hosts an annual dinner for Oscar nominees (The Hotels of the Stars, 2001; The Recording Academy, 2001). In addition, the Beverly Hilton is the site of the annual Golden Globe Awards and the annual Moving Picture Ball (The Hotels of the Stars, 2001).
(see Continuation Sheet)

B11. Additional Resource Attributes: (List attributes and codes)_____
***B12.** References:
see Continuation Sheet

B13. Remarks:

***B14. Evaluator:** Judith Marvin, Nicole Wallock, and Jay Michalsky
***Date of Evaluation:** 11 December 2001

(This space reserved for official comments.)



State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #_____
HRI #_____
Trinomial_____

 *Resource Name or #: (Assigned by recorder) Beverly Hilton Hotel

*Recorded by Nicole Wallock and Curt Duke, LSA Associates, Inc. *Date December 11, 2001 ☒ Continuation ☐ Update

B10. Under Criterion B, the Beverly Hilton is associated with several persons significant in our past. Of primary importance is the building architect, Welton Becket & Associates. The Los Angeles-based firm of Welton Becket became one of the largest in the nation and was responsible for several landmarks in many cities. A few notable buildings in the Los Angeles area include the Bullock's in Pasadena (the first suburban department store), the Pan Pacific Auditorium, the Capitol Records building (the world's first round office building), the geodesic Cinerama Dome in Hollywood, and the Theme Building at Los Angeles International Airport (Becket, 2001; Brower, 2001; Capitol Records, 2001; Hebert, 1969). One of the goals of Becket was to create more timeless, classical designs (Brower, 2001). Another important figure is the builder of the hotel, Conrad Hilton. The Hilton Hotel Corporation began in 1946 and is now one of the largest hotel chains in the nation (Conrad Hilton, 2001). Hilton was noted as stating that the Beverly Hilton was his favorite hotel. Vice President Nixon's association with the hotel was described above, but another politician was also very familiar with the hotel. The Beverly Hilton served as the "western White House" when President John F. Kennedy was in office (The Hotels of the Stars, 2001). Under Criterion C, the Beverly Hilton appears eligible because it possesses distinctive architectural characteristics. The Beverly Hilton is a significant example of the International Style. It possesses all of the characteristic elements, including steel and concrete structural elements, a flat roof without a ledge, metal frame windows set flush with the walls, and smooth unornamented wall surfaces (Carley, 1997; McAlester and McAlester, 1984). The International Style began circa 1925 and continues to the present, but this primarily architect designed style is relatively rare (McAlester and McAlester, 1984). Further, the building is considered the work of a master, Welton Becket. It embodies his goal of creating timeless, classical designs.

***B12.**

Becket, A.
2001 The Spirit of Los Angeles. *Los Angeles Times* 26 August: Calendar Section

Brower, M. A.
2001 The Spirit of Los Angeles. *Los Angeles Times* 26 August: Calendar Section

"Capitol Records" microla.com
2001 *Capitol Records* <http://www.microla.com/ltpages/capitol.htm>.

Carley, R.
1997 *The Visual Dictionary of American Domestic Architecture*: 222-229. Henry Holt and Company, New York.

"Conrad Hilton." Infoplease.com.
© 2001 Learning Network. 4 Jan. 2002 <http://www.infoplease.com/ipa/A0771939.html>.

"The Hotels of the Stars." seeing-stars.com
2001 *The Beverly Hilton*. <http://www.seeing-stars.com/Hotels/BeverlyHilton.shtml>.

"The Recording Academy" grammy.com
2001 *The Recording Academy* <www.grammy.com/academy/index.html>

Hebert, R.
1969 Welton Becket, Noted Architect, Dies at 66. *Los Angeles Times* 18 January: Sec 2, Page 1.

McAlester, V., and Lee McAlester
1984 *A Field Guide to American Houses*: 468-485. Alfred A. Knopf, Inc., New York

***Recorded by:** S. Treffers and R. Perzel, Rincon Consultants Inc. ***Date:** September 4, 2020 ☐ Continuation ☑ Update

***NRHP STATUS CODE:** 6Z

***P3a. Description (update):**

Since the time of its most recent evaluation in 2007, the Robinsons-May Site Department Store, formally located at 9900 Wilshire Boulevard, was demolished. Observed on the site visit, the only built feature remaining at 9900 Wilshire Boulevard is a plastic backlit sign mounted to a metal pole that displays an arrow and reads "Robinsons-May Parking."

P5a. Photo

Robinsons-May Site; View Northeast-Facing



Sign Remaining on Robinsons-May Site



***B10. Significance (update)**:

9900 Wilshire Boulevard was first evaluated in 2005, as part of the environmental review process for the 9900 Wilshire Project. At that time, Architectural Resources Group (ARG) performed a historical evaluation and concluded that the property was eligible for listing in the CRHR under Criterion 1 for its association with decentralization development patterns in Southern California after World War II and under Criterion 3 for the quality of its Mid-Century Modern architectural design (Impact Sciences, Inc. 2007).

The eligibility of 9900 Wilshire Boulevard was again explored in 2007 by Jones & Stokes Associates. The Jones & Stokes evaluation of the property concurred with the previously prepared ARG evaluation, that it was eligible for listing in the CRHR under Criterion 1 for its association with patterns of events that have made a significant contribution to the broad patterns of local history of California, in this case the planning and development of the Los Angeles area in the post-war era. The evaluation additionally found the property eligible for the CRHR under Criterion 3 for its architectural merit as an excellent example of a Mid-Century Modern commercial building in Beverly Hills (Impact Sciences, Inc. 2007).

The previous finding of eligibility for 9900 Wilshire Boulevard relates directly to the Robinsons-May Department Store building. Because the building is no longer extant, the property no longer retains historic integrity. As a result of this study, 9900 Wilshire Boulevard is recommended ineligible for listing in the NRHP, CRHR, or for local designation. It is no longer considered a historical resource for the purposes of CEQA.



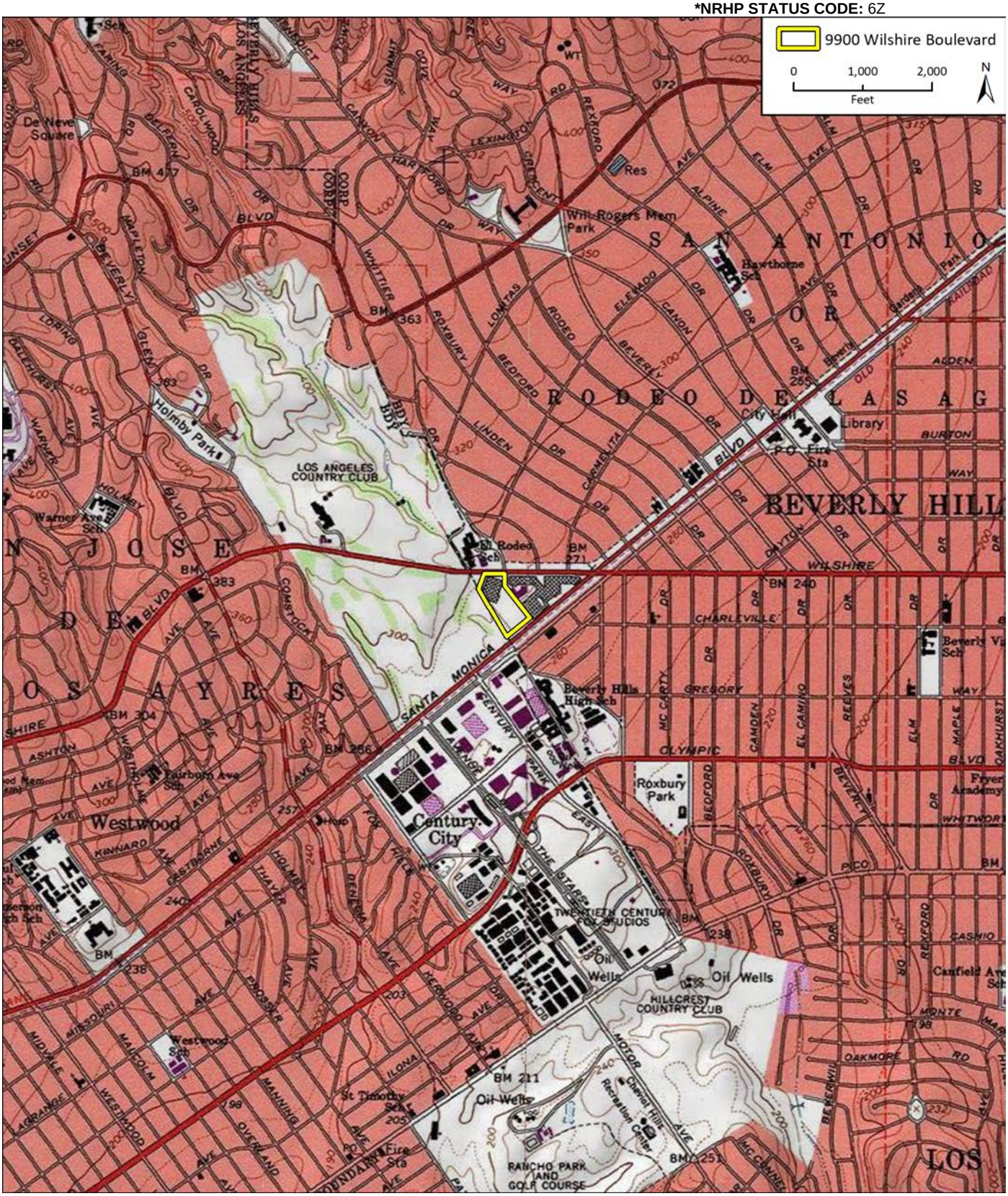
*B12. References

California Office of Historic Preservation
1995 *Instructions for Recording Historical Resources*. California Department of Parks and Recreation, Sacramento.
2006 *California Register and National Register: A Comparison*. Technical Assistance Series, No. 6. California Department of Parks and Recreation, Sacramento.

Impact Sciences, Inc.
2007 *9900 Wilshire Project Draft Environmental Impact Report Volume I* (SCH No. 2006071107). Prepared for the City of Beverly Hills. August.

Jones & Stokes Associates (Jones & Stokes)
2007a *Cultural Resources Technical Document for the Beverly Hilton Revitalization Plan, Prepared in Support of the Draft Environmental Impact Report*. Prepared for the City of Beverly Hills, Beverly Hills, CA.
2007b City of Beverly Hills Historic Resources Survey Report, Survey Area 5: Commercial Properties. Prepared for the City of Beverly Hills, June 2006, rev. April 2007.

National Park Service
1997 *How to Complete the National Register Registration Form*. National Register Bulletin 16a. U.S. Department of the Interior, Washington D.C.


9900 Wilshire Boulevard
0
1,000
2,000
Feet
N
BEVERLY HILLS
SAN ANTONIO
RODEO DE LAS AG
LOS ANGELES COUNTRY CLUB
Holmby Park
Will Rogers Mem Park
Beverly Hills High Sch
Century City
Westwood
Roxbury Park
HILLCREST COUNTRY CLUB
RANCHO PARK GOLF COURSE
WILSHIRE
SANTA MONICA
OLYMPIC
BEVERLY
Library
Fire Sta
Oil Wells

State of California X The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 3S; 3CS

OtherListings
Review Code Reviewer Date

Page 1 **of** 15 ***Resource Name or #:** (Assigned by recorder) Los Angeles Country Club
P1. Other Identifier: LACC

*P2. **Location:** ☐ **Not for Publication** ■ **Unrestricted**
- ***a. County** Los Angeles **and** (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)
- ***b. USGS 7.5' Quad** Beverly Hills **Date** 1995 (1999 ed.) **T** 1S ; **R** 15W ; ___ ☐ **of** ___ ☐ **of Sec** ___ ; ___ **B.M.**
- c. Address 10101 Wilshire Boulevard City Los Angeles Zip 90024
- d. UTM: (Give more than one for large and/or linear resources) Zone ___, _____ mE/ _____ mN
- e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate) APNs 4359018008, 4359020006, 4327027001, and 4359018007.

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting and boundaries)

The Los Angeles Country Club (LACC) is a private golf course and country club comprised of multiple parcels, including Los Angeles County APNs 4359018008, 4359020006, 4327027001, and 4359018007, which total approximately 300 acres (City of Los Angeles Department of City Planning, n.d.). Bisected by Wilshire Boulevard, the country club contains two 18-hole golf courses, a clubhouse building, tennis courts, parking lots, and various ancillary buildings such as maintenance and restroom buildings and a greenhouse. The more complexly designed North Course is located north of Wilshire Boulevard and the more restrained and smaller South Course is located south of the boulevard. Continued on page 4.

***P3b. Resource Attributes:** HP39. Other – Golf Course

P5a. Photograph or Drawing



***P4.Resources Present:** ■Building ☐ Structure ☐ Object ☐ Site ■District ☐ Element of District ☐ Other

P5b. Description of Photo: Overview of green and bunker on golf course.

***P6. Date Constructed/Age and Source:** ■Historic ☐ Prehistoric ☐ Both
Originally developed 1911 (Windeler 1997).

***P7. Owner and Address:**
Los Angeles Country Club
10101 Wilshire Boulevard
Los Angeles, CA 90024

***P8. Recorded by:** S. Zamudio-Gurrola and Rachel Perzel, Rincon Consultants

***P9. Date Recorded:** 10/23/20

***P10. Survey Type:** Intensive

***P11. Report Citation:** (Cite survey report and other sources, or enter "none.")

Perzel, R., S. Treffers and B. Campbell-King. 2020. One Beverly Hills Overlay Specific Plan Cultural Resources Technical Report. Rincon Consultants Project No. 20-09959. Report on file at the South Central Coastal Information Center, CSU Fullerton.

***Attachments:** ☐NONE ■Location Map ■Continuation Sheet ■Building, Structure, and Object Record
☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record
☐Artifact Record ☐Photograph Record ☐ Other (List):

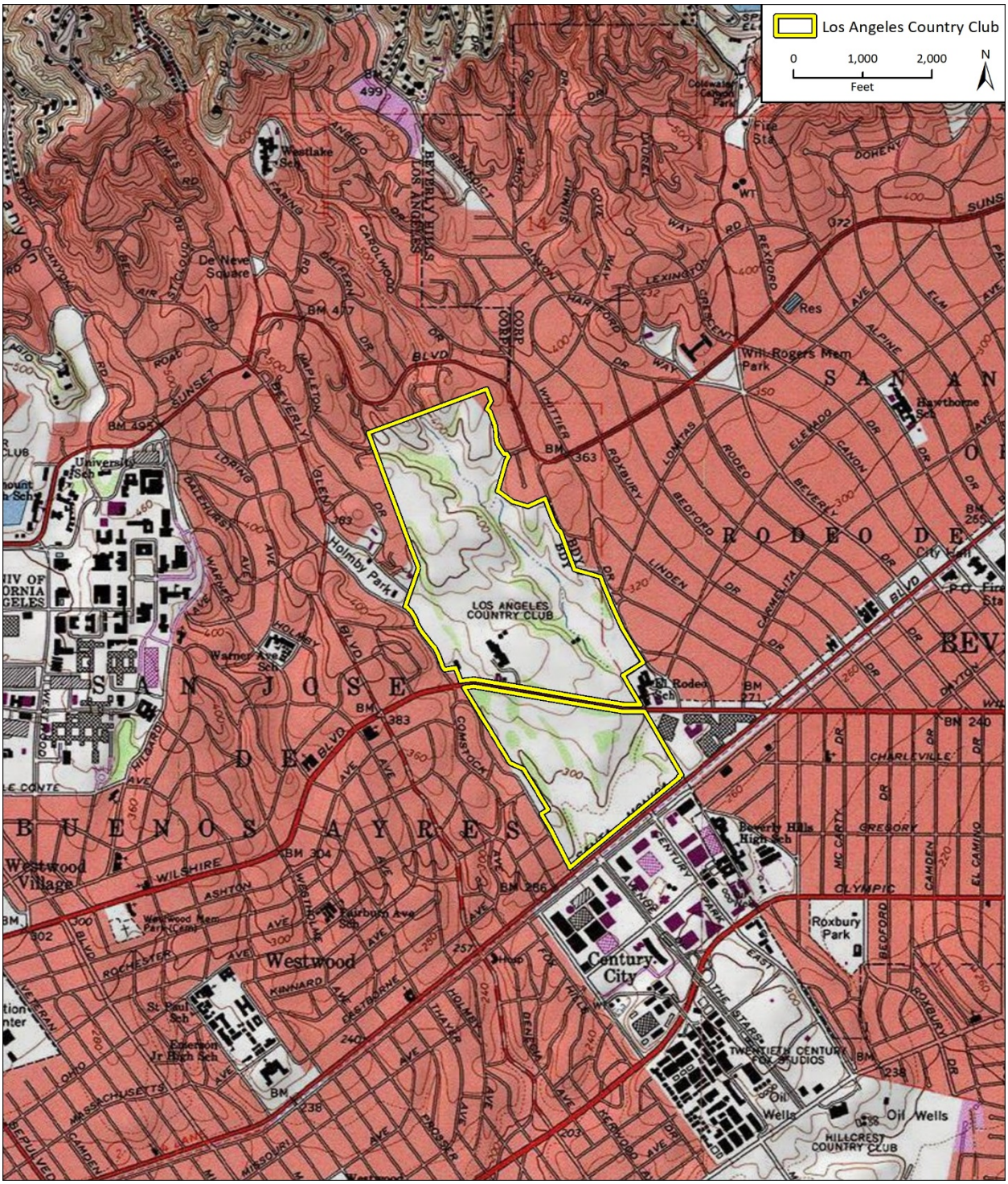
State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI#
Trinomial

***Resource Name or #** Los Angeles Country Club

***Map Name:** USGS *Beverly Hills* Quadrangle ***Scale:** 1:24,000 ***Date of map:** 1995 (1999 ed.)



BUILDING, STRUCTURE, AND OBJECT RECORD

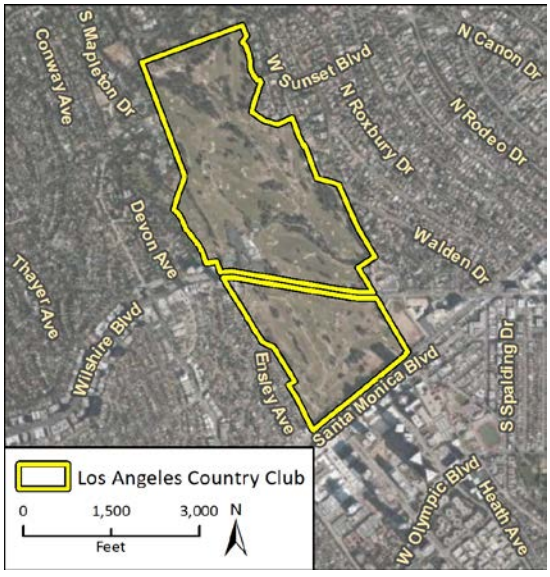
***Resource Name or #** (Assigned by recorder) Los Angeles Country Club ***NRHP Status Code** 3S ; 3CS
Page 3 **of** 15

B1. Historic Name: Los Angeles Country Club
B2. Common Name: Same
B3. Original Use: Golf Club B4. Present Use: Same
***B5. Architectural Style:** Clubhouse – Classical Revival
***B6. Construction History:** (Construction date, alterations, and date of alterations)
The LACC was developed in 1911. The golf course was altered various times over the decades, most notably in 1920-1921 when redesigned by W. Herbert Fowler to have two 18-hole courses on the north and south sides of Wilshire (implemented by George C. Thomas Jr.). In 1928 the North Course was redesigned by Thomas. In 1996 a partial restoration was made to the 1920-1921 Fowler and Thomas design. In 2015 the North Course was restored to its 1928 Thomas design and the South Course was redesigned by Gil Hanse. The clubhouse has been altered by flat-roofed additions at the rear (west) elevation, north elevation, and at the northeast corner. Porch roofs were added on the façade and several green awnings were added. Numerous structures have been demolished, including the 1911 employee bungalows, a barn, and a 1928 bridge. Numerous additions include (but are not limited to) bridges and tunnels (1920s), restroom buildings (1930), greenhouse (1938), tennis shop (1954), perimeter fencing (1946), golf shop (1966), bridge (1983), golf cart paths, and numerous non-original plantings.

***B7. Moved?** ☐**No** ■**Yes** ☐**Unknown** **Date:** 1898; 1899; 1911 **Original Location:** Pico & Alvarado streets; Pico Street near Hobart Boulevard; and Pico Street & Western Avenue ***B8. Related Features:**
B9a. Architect: Golf courses: William Herbert Fowler, George C. Thomas and William (Billy) Bell; Clubhouse: Sumner P. Hunt
b. Builder: Various
***B10. Significance: Theme** Private recreation facilities **Area** Los Angeles
Period of Significance 1911-1928 **Property Type** Golf Club **Applicable Criteria** A/1; C/3
Golf was emerging as a popular sport on the West Coast in the late 19th century, and several clubs were established in Southern California in the late 1890s. The first golf course in the city of Los Angeles was reportedly a private course built by John M. Baldwin at Rancho Los Feliz, in today's Griffith Park. It was destroyed by the great flood of 1884, but a municipal course was developed in its place in 1900 (Eberts 2020). The course is no longer extant, as it was removed in 1958 for the development of a new zoo (Grimes 2007). Additional golf courses developed in the Los Angeles area in the early 1900s included the San Gabriel Country Club (1904) near Mission San Gabriel, and the Annandale Golf Club (1906) and Brookside Golf Club (1925) in Pasadena's Arroyo Seco.

The Los Angeles Country Club began as The Los Angeles Golf Club, established in 1897 by Walter Grindlay, Edward B. Tufts, Hugh W. Vail and E. Conde Jones. The quartet leased a 16-acre parcel at the intersection of Pico and Alvarado streets, near the wealthy and fashionable West Adams district. In just a few days, the four men developed a nine-hole, 1,913-yard course using picks, shovels and rakes to clear debris. Tufts and Jones were said to have cut out the holes with butcher knives and used emptied tomato cans as cups in the center of each green. At the time, turf greens were thought to be impossible because of the lack of rain in the region. The greens were made of oiled sand. An existing windmill on the property was repurposed as the organization's first clubhouse. Thus, the course became known as "The Windmill Links" (Windeler 1997). See page 4.

B11. Additional Resource Attributes: (List attributes and codes) N/A
***B12. References:** See continuation sheet, page 13.
B13. Remarks:
***B14. Evaluator:** S. Zamudio-Gurrola & R. Perzel, Rincon Consultants
***Date of Evaluation:** 10/23/2020



(This space reserved for official comments.)

P3a. Description, continued:

The North Course is characterized by its 1927-1928 design (restored in 2015 by golf architect Gil Hanse) which flows with the natural topography of the land. It includes a dry wash running through the course, sand hills, grass, unique bunkers in the "Billy Bell Bunker" style which have uneven, toothy edges rimmed with shaggy grass, numerous varieties of trees, a natural area at the north end of the property, thick plantings along the perimeter fenceline, and golf cart paths. The South Course, a contemporary design by Gil Hanse in 2015, includes similar bunkers, grass, golf cart paths, and sparser tree groupings.

The LACC clubhouse is a large two-story building located slightly north of Wilshire Boulevard and oriented generally north-south on the property. Built in 1911, the year LACC moved to the Wilshire Boulevard location, the clubhouse was designed by prominent local architect and golfer Sumner P. Hunt. The original portion of the building is noted by its hipped roof with overhanging eaves and a primarily U-shaped footprint with a smaller wing projecting to the north. Based on aerial photos, the U was filled in on the west side of the building with a flat-roofed addition on which mechanical equipment is currently mounted. It appears additions were built at the northeast corner and north side of the building between the 1950s and 1960s. Based on historic photos, other alterations include the addition of porches supported by columns across the façade, the enclosure of the rotundas, addition of patio areas enclosed by balustrades, and replacement of original doors and windows. Construction/alterations were taking place on the clubhouse at the time of the survey, and the entirety of the building was not surveyed. Paved parking lots are located adjacent to the clubhouse to the south and west. To the northeast of the clubhouse is a grouping of approximately five buildings which appear to include a golf cart building, garage and possibly an employee residence, surrounded by hedges and shrubs.

B10. Significance, continued:

At the time, Grindlay served as president pro tem and Jones served as the secretary and treasurer pro tem. The four-member committee of Tufts, Grindlay, Vail, and Jones sent out invitations to potential charter members. Others supporting recruitment and organization efforts included Joseph F. Sartori, the president of the Security Savings Bank, and Mark Sibley Severance. Women were offered memberships with full privileges at a reduced price (Windeler 1997).

The club grew rapidly as the game increased in popularity, and Windmill Links became overcrowded. Tufts and Sartori searched for a new site to rent and located a piece of land 1.5 miles further west on Pico Street near what later became Hobart Boulevard. A new, slightly longer and more difficult 9-hole course was developed, which opened for play in September 1898. Its location behind a large convent led to it being called "The Convent Links" or "The 16th Street Links" as the street bound a portion of the golf course (Windeler 1997). One month later, the club officially incorporated as The Los Angeles Country Club (LACC). A board of nine directors was elected including Tufts, Sartori, Severance, Vail, Judge Charles Monroe, J.W.A. Off, John D. Foster, and Walter S. Newhall. Severance remained president and Foster was named the new secretary (Windeler 1997).

The Convent Links also proved too small for the LACC's needs. In April 1899, Sartrori and Tufts identified a new property slightly west, at the intersection of what is today Pico Street and Western Avenue, on which they could build an 18-hole course. In 1899, when it was completed, the LACC course was reported to be the first or second (depending on the source) 18-hole course west of Chicago. The clubhouse from The Convent Links location was transported onto the new location and expanded to three times its previous size, with assistance from the prominent local architect Sumner P. Hunt, who was also a golfer. This new course was known as "The Pico and Western Links" and was the first facility officially called "The Los Angeles Country Club". Continued on page 5.

B10. Significance, continued:

Although only two miles from downtown Los Angeles, the new club was considered to be out in the country. The end of the Pico Street electric train line was a half-mile away (Windeler 1997).

In 1904, Sartori acquired an option on the Wolfskill Ranch, near the area that would later become Beverly Hills. He convinced the LACC committee that it would be a fine location to establish a new club facility. The Country Club Realty Company was formed to raise money for the purchase by selling shared to club members. After purchasing the Wolfskill property, the realty company sold 140 of its 320 acres in 1905 to the LACC (Windeler 1997).

In 1906, Beverly Hills was named in honor of LACC member, Burton E. Green, a native of Beverly Farms, Massachusetts. An East Coast landscape architect laid out the curving streets, lots and triangular commercial district that characterize Beverly Hills today. Sales and development began slowly, and Green built the Beverly Hills Hotel in 1912 to help attract interested buyers (Beverly Hills Historical Society, n.d.). The LACC's presence also contributed considerably in drawing new residents to the then-remote area (Whited 2020). Within the next few years, significant development and growth occurred in the Los Angeles area boosted by annexations which created the Los Angeles Harbor (Port Los Angeles), and the funding of the Owens Valley Aqueduct. Los Angeles' population had tripled since the turn of the century and was nearly 320,000 in 1910. LACC's membership had grown to 508 members in 1908. By the end of the 1910s, the LACC's membership population had grown substantially such that dues were raised rather than increase the number of members, as the club was already overcrowded. Thus, in 1910 the LACC's Pico and Western property was sold and the LACC moved to a larger location for the third time, to the current Wilshire Boulevard property (Windeler 1997).

Sartori, Tufts, Charles E. Orr and Norman Macbeth (a champion player and golf course designer) designed the original 18-hole, 6,496-yard course at what was referred to as the club's "Beverly Hills" golf course (although the city did not formally incorporate until 1914 and the golf course remained outside the city boundaries). Seven holes of the course were plotted south of Wilshire Boulevard on undulating land, and eleven holes were plotted north of the boulevard on rougher terrain. Hole number three was split on both sides of Wilshire Boulevard and players had to time their drives off the tee to the passing automobile traffic. The landscape was described as barren with few trees. The new clubhouse was designed by the prominent local architect and club member Sumner P. Hunt at a cost of $85,000 (Windeler 1997). Located one mile away from a new electric trolley stop at Wilshire and Santa Monica boulevards, the LACC's new course and clubhouse opened in 1911. The new 6,496-yard course was a great improvement to the prior Pico and Western facility and was described as the best course in Southern California at the time (Windeler 1997).

Architect Sumner P. Hunt was associated over the years with various firms, including Caukin and Haas, Architects; Eisen and Hunt, Architects; Hunt and Burns, Architects; Hunt and Eager, Architects; Hunt, Eager and Burns, Architects. Hunt also worked on his own between 1892 and 1895. During his career, he was involved in the design of many notable residences and country and social clubs throughout Southern California. Among these are: oil tycoon Edward L. Doheny's residence (1898-1900), a clubhouse at Annandale Golf Club in Pasadena (1907), the Southwest Museum (1910-1914), various Ebell Clubs, and the Automobile Club of Southern California complex (Alan Michelson 2005-2020; Windeler 1997).

By the time the LACC's Beverly Hills location was established, tennis had become a popular activity at the club, and two tennis courts were included west of the clubhouse (approximately where the tennis courts are located today). Events were held at the club such as golf competitions, fourth of July displays, barbecues, baseball games, dinners and dances.
Continued on page 6.

B10. Significance, continued:

Improvements to Wilshire Boulevard led to increased traffic, creating difficulties for golfers crossing from the ninth green to the tenth tee, or playing the third hole. Arthur Letts, Sr., a club member and president of Bullock's and the Broadway department stores, donated money to build a footbridge across Wilshire (Windeler 1997).

In 1914 the community of Beverly Hills expanded its boundaries enough to meet the minimum number of citizens to incorporate. Although the LACC had been using "Beverly Hills" as its address since moving to the new location, it remained in unincorporated Los Angeles County. In 1916 the City of Los Angeles annexed the area, bringing the LACC officially into the Los Angeles city boundaries.

For some period of time, the club also featured a rifle and shotgun range above the fourteenth green. Developed in 1915, the shooting range was later removed at an unknown date. During the summer of 1918, Ed Tufts took it upon himself to rework some of the holes and greens while other board of director members were away in military service or on vacation, so he could insist on trying grass greens. Tufts and his green committee replaced the other sand greens in the same manner as the first two experimental ones, until only three sand greens were left on the course. The club eventually completed the conversion to all-grass greens, which was celebrated by many. Likely as a result, the LACC became more popular for tournaments beginning the following year. In spite of the war, golf's popularity had continued to grow. The club's membership threshold was raised and LACC made plans to buy the remaining 175 acres from the realty company to expand. The purchase included 118 acres north of Wilshire Boulevard and 57 acres to the south (Windeler 1997).

Sartori and Tufts, who had designed the earlier courses themselves, chose to hire a golf course architect for the expansion. In the Spring of 1920, Sartori and Tufts hired William Herbert Fowler, an English-born golf architect, to draw up models and design the two 18-hole courses at LACC. Fowler was a prolific golf course architect and was involved in the design of numerous courses including the Ambassador Hotel's Rancho Golf Course, a course for the Olympic Club of San Francisco, the Burlingame Country Club course, the Riverside Golf Club, and the Allegheny Country Club in Pennsylvania. The proposed design for LACC included an easier course covering the club's original grounds, and an updated championship course for the newly acquired land north of Wilshire Boulevard. Fowler simply described the courses as "North" and "South" so that others did not feel one course was implied to be superior to the other. The two courses were to be nearly identical in length but the ground over which they were to be played would vary considerably. Fowler managed to use in the new courses all of the fairways that Sartori, Tufts, Orr and Macbeth had constructed and as many of the greens as possible, although a few of them were abandoned. Fowler advocated planting shrubs and low trees on especially on the South Course. Fowler went over his plans with George C. Thomas Jr. and returned to the east coast, leaving the implementation of his plans in Thomas's hands. Although not entirely complete, the new courses opened for play in June 1921, with a formal opening in August of that year. The 6,445-yard, par-71 North Course acquired a reputation of being somewhat difficult (Windeler 1997).

George C. Thomas Jr. was a Philadelphia native who briefly studied at the University of Pennsylvania and enjoyed horticulture and hybridizing roses. He inherited a part of his parents' estate and did not have to work for a living. An avid golfer, Thomas started working amateurly on golf course design in the early 1900s. His family moved to a Beverly Hills estate in 1919. Subsequently, Thomas became responsible for carrying out Fowler's master plan for the North and South courses between 1920-1921. Thomas worked on numerous golf courses including Griffith Park, the Bel-Air Country Club, Riviera Country Club, the La Cumbre Country Club in Santa Barbara, and the Ojai Valley Inn. Thomas often collaborated with William (Billy) Bell, a construction supervisor turned golf course architect (Windeler 1997). Continued on page 7.

B10. Significance, continued:

Additional modifications to the club throughout the 1920s included redecorating of the clubhouse; a new pro shop was built; additional lockers were installed for the men's and women's locker rooms; a pergola was built; three bridges were constructed (at the No. 18 tee North, No. 6 North, and No. 8 South); two tunnels were built under Wilshire Boulevard to connect the South Course No. 2 and No. 3, and No. 16 and No. 17 holes; a new bridge was built at No. 9 North. The LACC once again commissioned Sumner P. Hunt to draw plans for a new space called the East Card Room. An additional 8.5 acres were purchased on the club's western boundary and all four tennis courts were rebuilt. In 1928 and 1929 the LACC sold approximately 15 acres northeast of the North Course along Beverly (later Sunset) Boulevard (Windeler 1997).

George C. Thomas, who had worked on the implementing Fowler's golf course design in 1920, was again commissioned to refurbish the North Course, which LACC records show cost approximately $50,000. Between 1927 and 1928 Thomas modified the North Course by entirely rebuilding hole No. 17 and redesigning others including Nos. 6, 10, 15, 16 and 18. Thomas collaborated with William (Billy) Bell, who supervised the construction and was tasked with modifying the bunkers. The Thomas and Bell design is noteworthy for the manner in which they worked with the natural topography of the land, the ability to play the holes in different manners due to the arrangement of several tees to each green, and the course's unique bunkers which are not typical ovals with smooth edges, rather they have been compared to baseball mitts for their finger-like edges rimmed with rough grass (Wharton 2015).

Various improvements were completed at the golf club in 1930 including building a new foot bridge between No. 17 and No. 18 North; the addition of restrooms on the courses; expansion of both men's and women's locker rooms; the construction of a new West Card Room; and the development of practice putting greens in front of the clubhouse. As Thomas was preparing to redesign the South Course in 1932, he died of a heart attack. The South Course greens were still refurbished that year. In 1937, a new porch room was furnished, and offices were enlarged. In 1938, Sartori donated funds for the construction of a conservatory/greenhouse, and the south parking lots were enlarged.

Changes continued on the property throughout the 1940s. This included adding a "growing house" in 1940 next to the conservatory/greenhouse; construction of a fence for the first time around the entire property in 1946; expansion of the north parking lot, and selling off a portion of the club property on the east side of Club View Drive in 1947. The clubhouse underwent major renovations in 1954, much of it interior work, but a new addition was built in the form of the Terrace Lounge, a patio and canvas awning. This lounge was designed and decorated by Cannel and Chaffin. That same year, a new tennis shop was built. In 1955 the tunnel between Nos. 2 and 3 South was widened to permit golf cart access to the South Course, and in 1958 both tunnels under Wilshire Boulevard were widened. A sign was installed at the Wilshire Boulevard entrance in 1956 which read "The Los Angeles Country Club/10101". New pathways were completed to aid golf cart usage in the 1950s and 1960s. A new golf shop was built in 1966. The men's and women's locker rooms were expanded and refurbished in 1970 at a cost of more than $800,000. In 1975, earthquake supports were installed in the clubhouse as steel plates in the attic of the building. In order to make room for a new maintenance building, in 1981, two of the original bungalows (employee housing) dating from 1911 were demolished. Two corrugated metal buildings, one of which had been the horse barn from the club's early days when horses were used to pull mowers, were removed as well. In 1983, a trestle bridge that had been built in 1928 was demolished and replaced with a simpler modern bridge. The clubhouse's first floor was renovated, and the golf cart storage area was enlarged in 1985. Additional clubhouse renovations in 1990 included enlarging the Terrace dining area and refurbishing the Sartori Room which received a new domed ceiling (Windeler 1997). Continued on page 8.

B10. Significance, continued:

The LACC began a master planning process in 1995 to bring back much of the North Course's design as Herbert Fowler's designed it and George Thomas implemented in 1920. The intent was not to put the entire course back to its 1921 form but rather reincorporate the character of the original course into the current design. The extensive construction on the North Course began in 1996. South Course was also entirely reconstructed between 1996 and 1997 – all greens were renovated to meet USGA specifications, including 18 new greens and about 50 bunkers. The bunkers were said to have been restored to their original forms and character, but the bunker shaping was not as severe in form as on the North Course to in order to maintain playability. The most significant alteration in the South Course was switching the locations of the No. 3 green and the No. 4 tee area. Modifications were also made to the practice area, developing a new teaching area, a new tee, a practice bunker, and a pitching and chipping green (Windeler 1997).

The extensive landscaping on the LACC property is described in the club's centennial book. Approximately 25 acres at the north end of the property contain native plants. Sycamores and oaks that were present when the club was first developed in 1911 still remained on the property in 1997. Numerous trees of many varieties were planted on the property over several decades. For example, during the major expansion of the club in the early 1920s, fast-growing trees were planted such as blue gum eucalyptus. The Monterey pines on the property were planted mostly in the 1950s, and Lombardy poplars were planted in approximately 1987. The four miles of perimeter fenceline required heavy plantings to ensure privacy and block views of surrounding buildings. LACC records describe a program of one of the club's superintendents (who was in the position between 1941 and 1971) of adding a minimum of 1,000 new trees per year (Windeler 1997).

In 2006, the LACC began interviewing architects to refurbish the North Course, which resulted in the selection of Gil Hanse, who proposed to restore the George C. Thomas Jr. and Billy Bell design from 1928. Thomas and Bell's course design was known for some unique elements – Thomas was said to prefer a more natural look, and the bunkers he and Bell created were not typical ovals with smooth edges, rather, they appeared like baseball mitts with fingers, and were rimmed by shaggy fescue. In his greens, Thomas often used distinctive peninsulas and wings to allow for varied pin placement. Hanse worked with golf historian Geoff Shackelford to study archival documents, and performed investigative work on the LACC property, in order to complete the restoration work. This began with restoring the bunkers, which was completed in 2010. The club membership approved additional work, and Hanse continued the North Course restoration. Hanse also refurbished the South Course with a new, contemporary design in 2015 (Wharton 2015; MoeGolf 2016; Jones 2020; Hanse Golf Design, n.d.).

Previous Evaluations

The potential historic significance of the LACC property was explored in 2011 as part of Los Angeles County Metropolitan Transportation Authority's Westside Subway Extension (WSE) Project. The WSE project proposed the construction of a below-grade rail alignment, a portion of which would traverse beneath the southwestern corner of the LACC property. The evaluation completed for the WSE project only considered the eligibility of the portion of the LACC property which was above the proposed rail alignment (roughly three acres). That portion of the property was recorded on DPR forms, and the study concluded the three acres in the southwestern corner of the property appeared eligible for listing in the NRHP and CRHR under Criterion C/3 as a historic landscape that embodied the distinctive characteristics of a professionally designed landscape over 50 years old, and retained sufficient integrity to qualify for listing in the NRHP and CRHR. Continued on page 9.

Previous Evaluations, continued:

In 2015, the LACC was identified by SurveyLA, a city-wide historic resources survey of Los Angeles. Because it is not accessible to the public, a formal evaluation was not possible. SurveyLA assigned it the status code QQQ meaning "may be eligible; additional research needed". The SurveyLA results discussed the property's potential historic significance and indicated it appeared eligible for listing in the NRHP, CRHR and as a City of Los Angeles Historic-Cultural Monument under Criteria A/1/1 as an excellent example of an early 20th century golf course and country club in Los Angeles which has been in continuous use since 1911. Additionally, it appeared eligible under Criteria C/3/3 as an excellent example of an early 20th century golf course designed by master golf course architects Herbert Fowler and George C. Thomas Jr.

Current Evaluation:

As part of the current cultural resources study for the One Beverly Hills Overlay Specific Plan, the LACC property was recorded and an updated evaluation for eligibility for listing in the NRHP and CRHR was completed.

The Los Angeles Country Club, or LACC, was developed in 1911 as the club's fourth location. Originally established in 1897, the club's first three golf courses were located at: the intersection of Pico and Alvarado streets, Pico Street near Hobart Boulevard, and Pico Street and Western Avenue. Due to the increased popularity of the sport and need for a larger facility for their members, the LACC moved further west to the Wilshire Boulevard location, a more remote area where land was available in a key area being primed for development. Originally designed by club founders Sartori, Tufts, Orr, and Norman Macbeth, a champion player and golf course architect, the 18-hole course was 6,496 yards long. Seven of the holes were plotted south of Wilshire Boulevard and eleven holes were plotted north of the boulevard. Sumner P. Hunt, a prominent local architect who is known for several notable buildings in the Los Angeles area, designed the large, two-story clubhouse in a classical revival style. The LACC property was later expanded with additional acreage on both sides of Wilshire Boulevard, and the golf course was redesigned by professional golf course architects. Numerous additions and alterations have occurred on the LACC property over the course of its existence.

Criterion A/1

The LACC appears significant at the local level of significance under Criterion A/1 for its association with the broad patterns of local history, specifically the early development of private recreational facilities in the City of Los Angeles. The property is an extant representative example of an early 20th century private country club and golf course which has remained in the continual use since it was originally developed in 1911. At the time of its development, the future site of LACC was a remote and largely undeveloped area near the growing but small town center of Beverly Hills. The Beverly Hills Hotel, completed in 1912, and the LACC both served to draw visitors and spurred development in the surrounding area. Annexed in 1916 into the City of Los Angeles' boundaries, the LACC may be the oldest extant golf course in Los Angeles proper. Other extant golf clubs from the approximate era and in the greater Los Angeles area include the San Gabriel Country Club founded in 1904 near Mission San Gabriel, the Annandale Golf Club founded in 1906 on the west side of Pasadena' Arroyo Seco, and the Wilshire Country Club, founded in 1919. As relayed by LACC historian Adrian Whited, due to golf's growing popularity, by the 1930s there were approximately 40 golf courses in the greater Los Angeles area spanning from the San Fernando Valley to Long Beach, and from East Los Angeles to the Pacific Ocean. Within this context, the LACC is an excellent representative example of one of the earliest extant private golf clubs in Los Angeles.

Continued on page 10.

Current Evaluation, continued:

Criterion B/2

The LACC does not appear to be significant under Criterion B/2. Archival research shows club membership included numerous wealthy and well-known individuals. However, they were not directly associated with the LACC organization, rather, they came to recreate as did countless others on the property. Archival research did not indicate the LACC property is directly associated with the lives of persons important to local, California or national history.

Criterion C/3

The North Course of the LACC property appears significant under Criterion C/3 as an excellent example of a 1920s golf course designed by master golf course architects George C. Thomas Jr. and William "Billy" Bell during a period known as the golden era of golf course design (Southern California Golf Association 2017). This design is limited to the North Course which embodies the distinctive characteristics of a type and represents the work of a master. It is significant for the unique elements for which Thomas and Bell are known for, such as the incorporation of the natural topography and setting into the golf course layout, bunkers with artistic, uneven edges, and holes that can be played by various approaches. While the Thomas and Bell Design was altered in the years after it was completed in 1928, the North Course was carefully restored to its 1928 design in 2015 by Gil Hanse. California OHP guidance states that historical resources which have been rehabilitated or restored may be evaluated for listing. In addition, the 1911 clubhouse represents the work of a master, architect Sumner P. Hunt.

Criterion D/4

The LACC does not appear significant under Criterion D/4 as the golf course and its buildings were constructed using common building materials; the property does not have the potential to yield information regarding local building traditions or methods. Available evidence does not indicate the golf club property has the potential to yield information important to prehistory or history.

Integrity

Integrity is the ability of a property to convey its significance. As indicated in the significance evaluation above, since the completion of the Thomas and Bell design of the North Course in 1928, the LACC property has undergone various changes including:

- modifications to the property boundary through sales and purchases of additional property;
- demolition of original (1911) buildings and structures such as employee bungalows, mowing horse barn, and early bridges connecting parts of the golf course;
- additions to the clubhouse on the west, east and north elevations and replacement of clubhouse windows;
- various alteration to the design/layout of the North and South Course (over several decades);
- addition of new features such as practice putting greens (1930) four miles of perimeter fencing (1946), entry signage (1956);
- addition of new buildings and structures such as greenhouse (circa 1939), growing house (1940), golf shop (1966), maintenance building (1981) and bridge (1983);
- enlargement of the tunnels under Wilshire Boulevard (1955 and 1958);
- construction of new pathways throughout (1950s and 1960s);
- enlargement of parking lots and the golf cart storage area;

Continued on page 11

Current Evaluation, continued:

- modification to the types of trees/plantings located on the property (over several decades);
- refurbishment of the North and South Courses (several times throughout the 2000s);
- 2015 redesign of the South Course by Gil Hanse

Although the boundaries of the LACC property have been expanded and diminished over time, the location of many of its character-defining features retain their original location. The location of the property's two 18-hole golf courses and that of Wilshire Boulevard within the property are original to its period of significance. The property's access road off Wilshire Boulevard and its club house remain in their original location. Therefore, the property retains integrity of location sufficient to convey its significant associations under Criteria A/1 and C/3 (North Course).

The LACC property is significant as an excellent example of a 1920s golf course designed by master golf course architects George C. Thomas Jr. and William "Billy" Bell during a period known as the golden era of golf course design. However, while the north course was restored to its 1928 appearance in 2015, a new design was applied to the south course in 2015 such that it no longer retains integrity of design, materials and workmanship. While the course overall retains sufficient integrity of design, materials and workmanship to convey its significant associations under Criteria A/1, only the north course retains sufficient integrity of design, materials and workmanship to convey its significant associations under Criteria C/3.

At the time of its initial development, the LACC property was surrounded by a rural setting. However, by the end of its period of significance, the cities of Beverly Hills and Los Angeles had grown to surround the property with development which has only densified since the historic period. Although not the intention of the property's location in its initial development, the LACC has none the less functioned as an urban golf course for much its existence. However, due to its size and the retention of vistas within it, it retains integrity of setting, feeling and association sufficient to convey its significant associations under Criteria A/1 and C/3 (North Course).

Period of Significance

A property's period of significance refers to the date or span of time during which significant events and activities occurred. LACC moved to its current location in 1911. From 1911 through 1928, the LACC property was developed to include two 18-hole golf courses, the North and South Courses, and a clubhouse in addition to variety of associated features and structures. Under Criteria A/1, the property's significance is related to its development within the context of the Los Angeles's recreational development in the early 20th century. Therefore, the period of significance associated with Criteria A/1 encompasses its initial development, which occurred progressively from 1911 through 1928. Under Criteria C/3, the property's significance is related to its association with master golf course architects George C. Thomas Jr. and William (Billy) Bell, as an excellent example of their work. As both Thomas' and Bell's contributions to the property occurred in its initial phase of development, between 1911 and 1928, the period of significance associated with Criteria C/3 also spans this period.

Character-Defining Features

According to the NPS, the character of landscapes is defined by their spatial organization and land patterns, features such as topography, vegetation, and circulation, and their materials. As noted in the evaluation above, the significance of the LACC property under Criterion A is associated with the entirety of the property. The character-defining features of the property that convey its significance under Criterion A include the following: (Continued on page 12)

Current Evaluation, continued:

- Presence of two 18-hole courses
- Division of the property by Wilshire Boulevard
- Varied topography within boundaries
- Trees (including California Sycamores) scattered throughout and along some of its perimeter
- Primary entry road off Wilshire Boulevard leading to club house
- Retention of natural drainage features
- Lack of artificial water features
- Tunnels (2) under Wilshire Boulevard
- Prominently located Sumner P. Hunt designed club house
- Tennis courts located west of club house (4)

The significance of the LACC property under Criterion C is associated only with the north course. In addition to those noted above, the following character-defining convey the significance of the north course under Criterion C:

- Bunker design (sometimes referred to as “Billy Bell Bunkers”)
- Course layout (including fairways, tees and bunkers)
- Presence of naturally landscaped areas throughout

B12. References, continued:

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P5a. Photographs, continued:

Overview of golf course



Overview of urban setting



Overview of clubhouse, eastern façade



State of California - The Resources Agency Primary#
DEPARTMENT OF PARKS AND RECREATION HRI #
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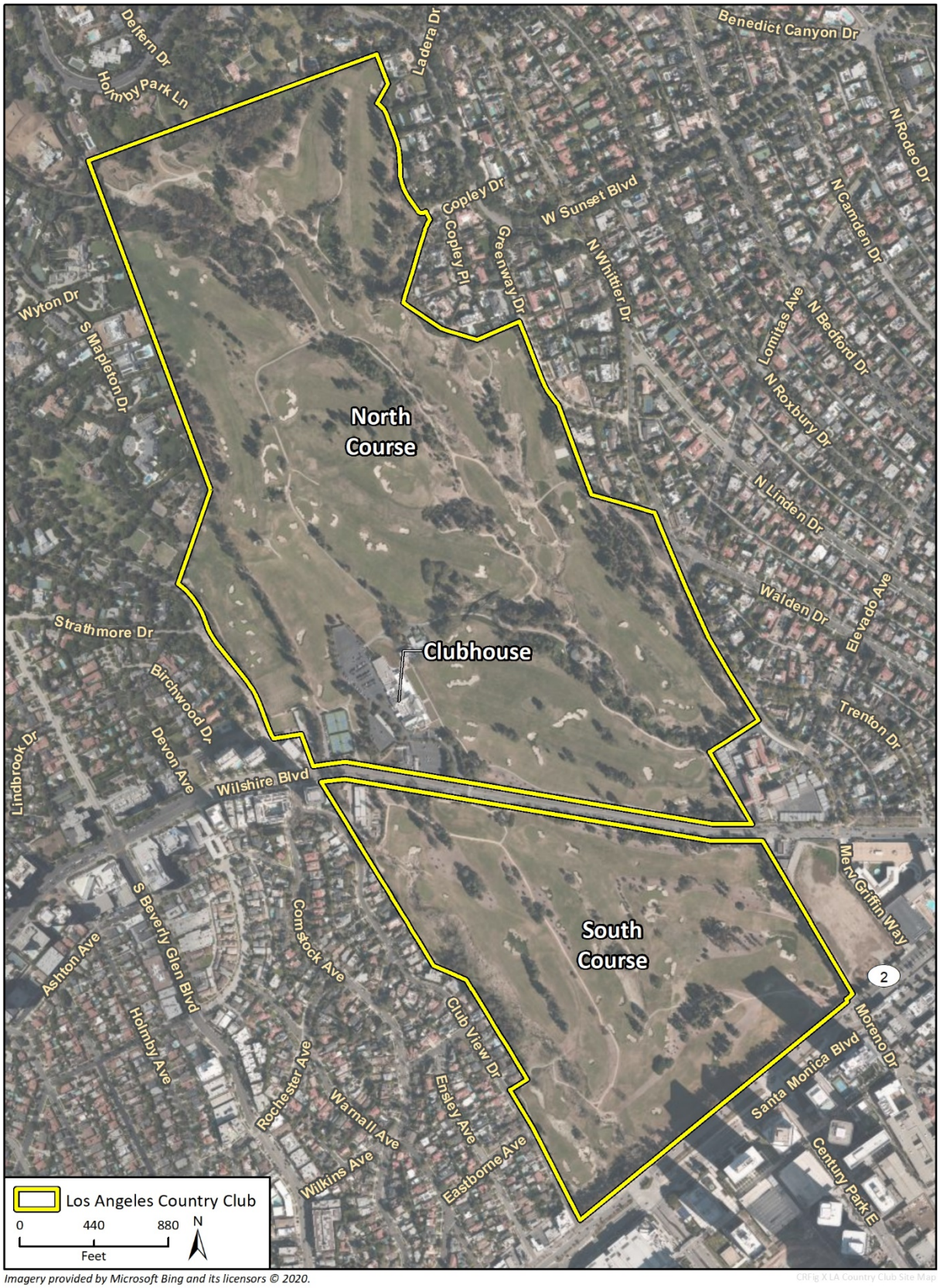
CONTINUATION SHEET

Property Name: _Los Angeles Country Club _____

Page 15 of 15



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CRFig X LA Country Club Site Map