

**APPENDIX C.2: HISTORIC RESOURCES
SUPPLEMENTAL MEMORANDUM**

GPA Consulting
400-432 S. San Vicente Boulevard, Supplemental Memorandum
September 22, 2023

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SUPPLEMENTAL MEMORANDUM

Date: September 22, 2023
 For: 400 S. San Vicente LLC
 cc: Dennis Carey, Shane Parker, Scott Rynders
 Subject: 400-432 S. San Vicente Boulevard
 From: Amanda Duane, Senior Architectural Historian

1. INTRODUCTION

GPA Consulting (GPA) was retained by the Project applicant to prepare a Phase I Historical Resource Evaluation Report (HRER) in anticipation of a proposed project (Proposed Project) in the Wilshire Community Plan Area (CPA) of the City of Los Angeles. The Proposed Project site is comprised of two parcels:

- 400 S. San Vicente Boulevard, Assessor Parcel Number (APN) 5511-044-038
- 432 S. San Vicente Boulevard, APN 5511-044-013

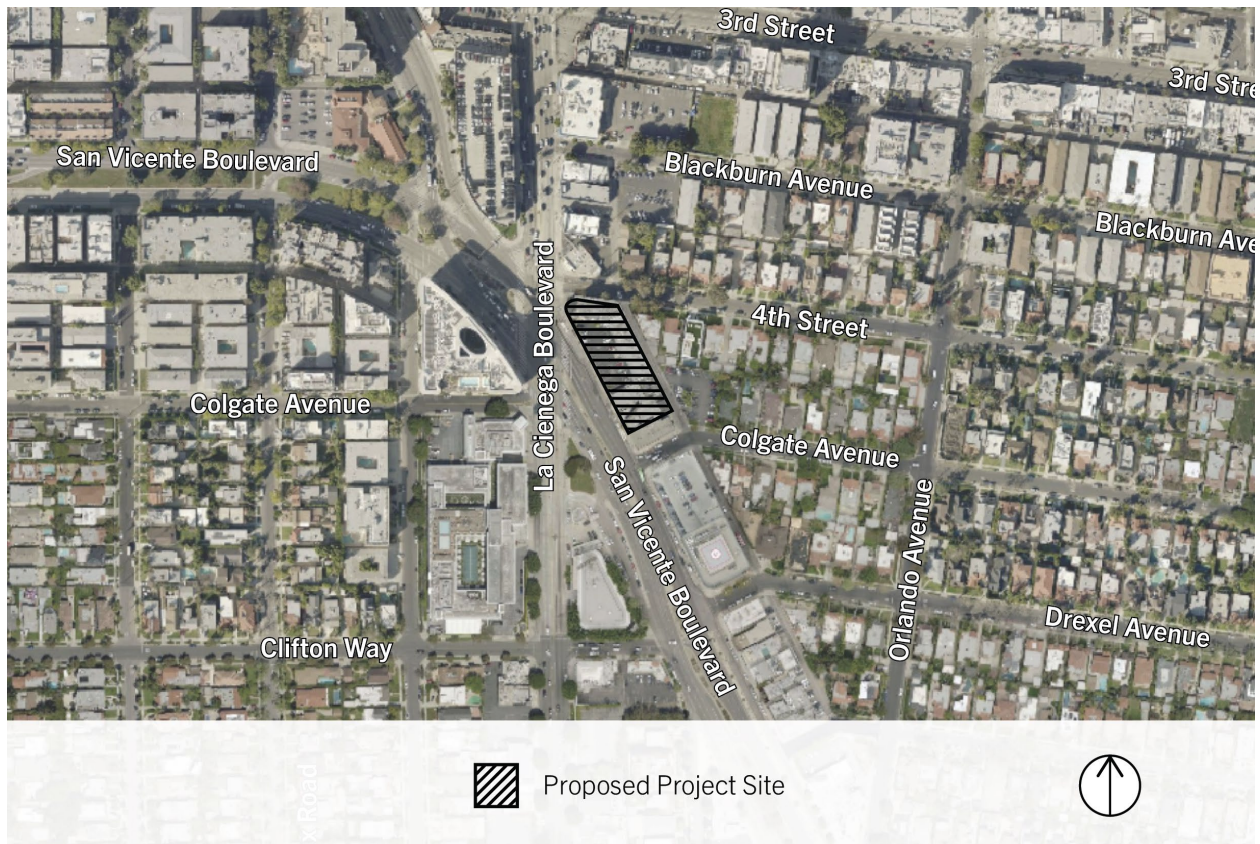


Figure 1: Proposed Project site location (base image courtesy of Los Angeles County GIS).



Figure 2: Proposed Project Site, view looking northeast, 432 S. San Vicente at right beneath billboard (GPA Consulting, September 2022).

The building at 400 S. San Vicente was constructed in 1986 and was not evaluated as a potential historical resource as it is less than 45 years of age. The building at 432 S. San Vicente, constructed in 1961, was evaluated as a potential historical resource within the Arterial Commercial Development, 1880-1950 theme of the Commercial Development, 1859-1980 context in the *Los Angeles Citywide Historic Context Statement* (LACHCS). GPA concluded that 432 S. San Vicente did not appear eligible for designation at the national, state, or local levels.

During review of the Proposed Project, the City of Los Angeles (City) Planning Department requested that the Project applicant provide supplemental analysis to assess the Proposed Project for potential impacts to previously identified historical resources in the vicinity. GPA prepared this memorandum (memo) as a supplement to the Phase I HRER in response to this request.

2. REGULATORY FRAMEWORK

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register. The California Register is modeled after the National Register. Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain statutory criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant. A lead agency may also treat a resource as historic if it meets statutory requirements and substantial evidence supports the conclusion. The National Register, California Register, and City designation programs are discussed below.



2.1 National Register of Historic Places

The National Register is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”¹

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:²

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. “National Register Bulletin 15” states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”³ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in National Register Bulletin 15 “s” “the ability of a property to convey its significance.”⁴ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

¹ Title 36 Code of Federal Regulations Part 60.2.

² Title 36 Code of Federal Regulations Part 60.4.

³ Patrick Andrus and Rebecca Shrimpton, eds., (National Register Bulletin 15) *How to Apply the National Register Criteria for Evaluation* (US Department of the Interior, National Park Service, Cultural Resources: 1997), 8-9, accessed September 2023, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

⁴ *Ibid.*, 44-45.

Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”⁵

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.⁶

A district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁷

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.⁸

2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and

⁵ Ibid, 5.

⁶ Title 36 Code of Federal Regulations Part 60.3(d).

⁷ Donna J. Seifert, Barbara J. Little, Beth L. Savage, and John H. Sprinkle, Jr., (National Register Bulletin 21) *Defining Boundaries for National Register Properties* (US Department of the Interior, National Park Service, Cultural Resources: 1997), 12, accessed September 2023, <https://www.nps.gov/subjects/nationalregister/upload/Boundaries-Completed.pdf>.

⁸ Linda F. McClelland, Carol D. Shull, and James Charleton, (National Register Bulletin 16A) *How to Complete the National Register Registration Form*, eds. Maureen P. Danaher and Rebecca Shrimpton (US Department of the Interior, National Park Service, Cultural Resources: 1999), 16, accessed December 2022, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.



citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.⁹

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹⁰

Criteria and Integrity

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

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

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous regarding the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹¹

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all the following criteria:¹²

1. The survey has been or will be included in the State Historic Resources Inventory;

⁹ Public Resources Code §5024.1 (a).

¹⁰ Public Resources Code §5024.1 (d).

¹¹ Public Resources Code §4852.

¹² Public Resources Code §5024.1.



2. The survey and the survey documentation were prepared in accordance with office [OHP] procedures and requirements;
3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

Office of Historic Preservation Survey Methodology

The evaluation instructions and classification system prescribed by the Office of Historic Preservation (OHP) in its *Instructions for Recording Historical Resources* provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

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

2.3 Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating HCMs. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. A monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles and may be designated if it meets at least one of the following criteria:

1. The proposed HCM is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community or community; or

2. The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history;
3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents; or represents a notable work of a master, designer, builder, or architect whose individual genius influenced his or her age.¹³

2.4 Los Angeles Historic Preservation Overlay Zone Ordinance

The Los Angeles City Council adopted the ordinance enabling the creation of HPOZs in 1979; Angelino Heights became Los Angeles' first HPOZ in 1983. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

According to Section 12.20.3 of the City of Los Angeles Municipal Code, one of the requirements to establish an HPOZ is a Historic Resources Survey that includes a Context Statement. The Context Statement "supports a finding establishing the relation between the physical environment of the Preservation Zone and its history, thereby allowing the identification of historic features in the area as contributing or non-contributing." The Context Statement shall also:

- Represent the history of an area by theme, place, and time, and define the factors that shaped the development of the area. This may include:
 - Historical activities or events¹⁴
 - Associations with historic persons¹⁵
 - Architectural styles and movements, master architects, designers, building types, building materials, landscape design, or pattern of physical development¹⁶
- Define a period of significance

Features designated as contributing must be identified as such in the Historic Resources Survey and meet one or more of the following criteria:

1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
3. Retaining the building, structure, landscaping, or natural feature would contribute to the preservation and protection of a historic place or area of historic interest in the City.

¹³ Los Angeles Administrative Code Section 22.171.7.

¹⁴ Generally, this correlates with National and California Register Criterion A/1.

¹⁵ Generally, this correlates with National and California Register Criterion B/2.

¹⁶ Generally, this correlates with National and California Register Criterion C/3.

2.5 Thresholds for Impacts on Historical Resources

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

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.

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows:

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Title 14 California Code of Regulations Section 15064.5(b)(2) in turn explains that a historical resource is “materially impaired” when a project:

Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

In 2019, Los Angeles City Planning adopted Appendix G (Environmental Checklist Form) of the Association of Environmental Professionals CEQA Statute and Guidelines as the thresholds of significance for impacts. As such, the 2006 “L.A. CEQA Thresholds Guide” (Guide) is no longer the source for default thresholds, but may be used as a reference document to inform environmental analysis. The Guide states that a project would normally have a significant impact on a historical resource if it would result in a substantial adverse change in the significance of the historical resource. A substantial adverse change in significance occurs if the project involves:

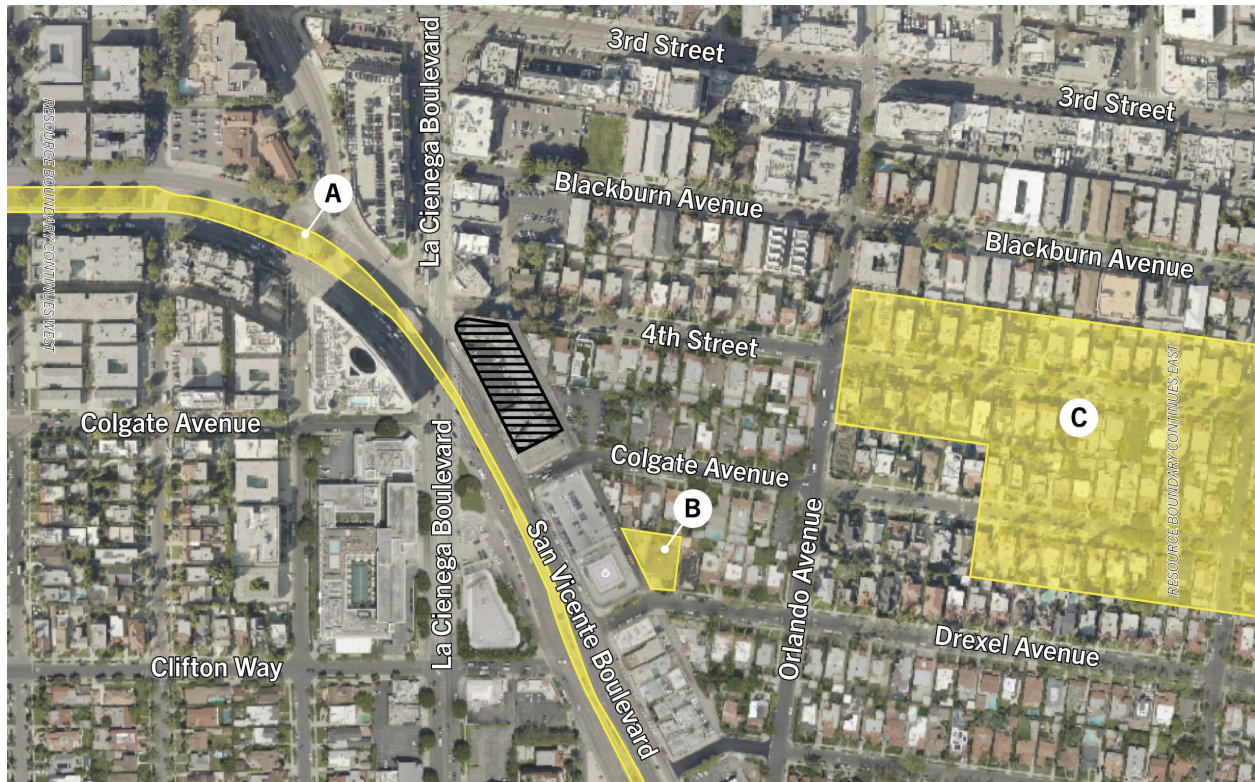
- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior’s Standards for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

As such, the test for determining whether a proposed project will have a significant impact on an identified historical resource is whether or not the project will alter in an adverse manner the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs such as the list of HCMs.

3. PREVIOUSLY IDENTIFIED HISTORICAL RESOURCES

The following historical resources were identified in the vicinity of the Project site using the City's online inventory, HistoricPlacesLA (HPLA):

- A. San Vicente Boulevard Median
- B. 6727 Drexel Avenue
- C. 4th Street-Colgate Avenue Residential Historic District



Historical Resource (Identified in SurveyLA)
 Proposed Project Site
 ↑

Figure 3: Previously identified historical resources in the vicinity of the Proposed Project Site (base image courtesy of Los Angeles County GIS).

A marker for the Maxwell House (HCM No. 808) is displayed on HPLA in the vicinity of the Project site; however, additional research indicates that the Maxwell House is actually located several miles away at 822 E. Edgeware Road in the Silver Lake - Echo Park - Elysian Valley CPA. As such, it is not addressed in this memo.

A: San Vicente Boulevard Median



Figure 4: San Vicente Boulevard Median, view looking northwest (Google Maps, August 2022).

The San Vicente Boulevard Median is a landscaped median in the center of San Vicente Boulevard between the intersections with N. Rexford Drive in the City of Beverly Hills to the west, and Pico Boulevard in the City of Los Angeles to the east. The median was constructed between 1955 and 1961 after the streetcar tracks were removed in the area.¹⁷ It varies between approximately 50 feet and 6 feet in width and has breaks for turning lanes and cross streets. It consists of unplanted ground cover with sporadic street trees and shrubs. Trees include jacarandas, coral trees, and magnolia trees. The portion of the median in the vicinity of the Project site is narrow and only planted with shrubs.

The median was identified during the 2015 SurveyLA survey of the Wilshire CPA and recorded in three segments between the City of Beverly Hills boundary and Pico Boulevard. The three segments were assigned status codes of 5S3 indicating that they appeared eligible for local listing as an example of a monumental civic improvement.¹⁸ The period of significance for the Monumental Civic Improvements sub-theme ends in 1939; however, the LACHCS eligibility standards state that examples post-dating this period may qualify if they meet other standards for eligibility.¹⁹

The median is identified as retaining sufficient integrity to convey this significance; however, a review of historic aerial photographs indicates that the current configuration of the median in the vicinity of the Project site was modified several times over the years and that its current configuration has existed since c. 2000.²⁰

Table 1: Context/Theme/Property Type – San Vicente Boulevard Median
Context: Cultural Landscapes, 1850-1980
Sub-Context: Designed Landscapes, 1875-1980

¹⁷ “San Vicente Boulevard Median (Segment 3 of 3),” HistoricPlacesLA, accessed September 2023, <http://historicplacesla.org/reports/8f97b0c5-dca7-4372-a819-5ffe8be29e6c>.

¹⁸ “San Vicente Boulevard Median.”

¹⁹ Marlise Fratinardo, “Cultural Landscapes, 1850-1980: Designed Landscapes, 1875-1980,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, October 2019), 19-20, accessed September 2023, https://planning.lacity.org/odocument/fb85d059-05ec-408c-99a2-e2991756aae2/8.1.DesignedLandscapes_1875-1980.pdf.

²⁰ Historicaerials.com.

Table 1: Context/Theme/Property Type – San Vicente Boulevard Median
Theme: Monumental Civic Improvements, 1905-1939
Property Type: Landscaped Median
Criteria: 1, 3 ²¹

B: 6727 Drexel Avenue



Figure 5: 6727 Drexel Avenue, view looking north (Google Maps, August 2022).

6727 Drexel Avenue is a single-family residence located at the northeast corner of Drexel Avenue and an alley that runs parallel to San Vicente Boulevard. It was constructed in 1909.

The house is one-and-a-half stories in height with its primary elevation facing Drexel Avenue. It has a low-pitched side-gabled roof clad in composition shingles with open eaves, exposed rafter tails, and projecting roof beams. The exterior is clad in painted wood shingles. At the center of the primary elevation, there is a projecting porch covered by a distinctive front-gabled roof with sweeping, open eaves supported by sturdy wood posts. The porch is accessed by a set of concrete steps and enclosed by a low brick wall. The primary entrance sheltered under the porch consists of a single partially glazed wood door. Visible windows consist of divided-light wood casements and single-light fixed wood windows.

The residence was identified during the 2015 SurveyLA survey of the Wilshire CPA. It was assigned a status code of 3S/3CS/5S3, indicating that it appeared eligible for national, state, and local listing for its association with Early Residential Development in the Wilshire area, and as an excellent example of a Craftsman Airplane Bungalow.²²

²¹ Fratinardo, "Designed Landscapes," 19-20.

²² "6727 W. Drexel Ave," HistoricPlacesLA, accessed September 2023, <http://historicplacesla.org/reports/c4f2d17b-3645-40dd-9709-d55b44a53b1e>.

Table 2: Contexts/Themes/Property Type – 6727 Drexel Avenue
Context 1
Context: Residential Development and Suburbanization, 1850-1980
Theme: Early Residential Development, 1880-1930
Sub-Theme: Early Single-Family Residential Development, 1880-1930
Property Type: Single-Family Residence
Criterion: A/1/1 ²³
Context 2
Context: Architecture and Engineering, 1850-1980
Theme: Arts and Crafts Movement, 1895-1930
Sub-Theme: Craftsman, 1905-1930
Property Type: Single-Family Residence
Criterion: C/3/3 ²⁴

C: 4th Street-Colgate Avenue Residential Historic District



Figure 6: View looking northeast on 4th Street toward S. Sweetzer Avenue (Google Maps, August 2022).

The 4th Street-Colgate Avenue Residential Historic District is a potential historic district consisting of properties on both sides of 4th Street between S. Orlando Avenue and the alley west of Fairfax Avenue,

²³ “Residential Development and Suburbanization, 1880-1980: Early Residential Development, 1875-1980,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, September 2017), PAGE NUMBER, accessed September 2023, https://planning.lacity.org/odocument/09cf9007-272f-4990-b845-7031b8ed63e4/EarlyResidentialDevelopment_1880-1930_0.pdf.

²⁴ Teresa Grimes, “Architecture and Engineering, 1850-1980: Arts and Crafts Movement, 1895-1930,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, June 2016), 19-20, accessed September 2023, https://planning.lacity.org/odocument/18037253-197d-483a-8b13-c85fcd553fe8/ArtsandCraftsMovement_1895-1930.pdf.



and properties on both sides of Colgate Avenue roughly between S. Orlando Avenue and S. Sweetzer Avenue.

Most of the properties within the potential district boundaries are one- to two-story single-family residences designed in Period Revival styles including Spanish Colonial Revival and Tudor Revival. Cohesive features including uniform setbacks, detached garages, driveways, and walkways further characterize the potential district.

The potential district was identified during the 2015 SurveyLA survey of the Wilshire CPA. It was assigned a status code of 3S/3CS/5S3, indicating that it appeared eligible for national, state, and local listing for its association with the history of the Jewish community in Los Angeles, and as a cohesive concentration of Period Revival architecture. The period of significance was established as 1922-1953.

Table 3: Contexts/Themes/Property Type – 4th Street-Colgate Avenue Historic District
Context 1
Context: Architecture and Engineering, 1850-1980
Theme: Housing the Masses, 1880-1975
Sub-Theme: Period Revival Neighborhoods, 1918-1942
Property Type: Automobile Suburb
Property Sub-Type: Subdivision
Criterion: C/3/3 ²⁵
Context 2
Context: Residential Development and Suburbanization, 1850-1980
Theme: Ethnic Enclaves, 1880-1980
Property Type: Residential Neighborhood
Criterion: A/1/1 ²⁶

²⁵ GPA Consulting, “Architecture and Engineering, 1850-1980: Period Revival, 1919-1950,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, January 2016), 35-38, accessed September 2023, https://planning.lacity.org/odocument/5997064e-8a5b-4bd4-a26d-c6009582e847/PeriodRevival_1919-1950.pdf.

²⁶ Architectural Resources Group, “Historic Resources Survey Report: Wilshire Plan Area, Appendix C” *SurveyLA Los Angeles Historic Resources Survey* (City of Los Angeles Office of Historic Resources, January 23, 2015), 1, accessed September 2023, https://planning.lacity.org/odocument/1ef16593-9784-40c6-a60e-652e3aa508f3/Wilshire_District_Resources.pdf

4. PROPOSED PROJECT AND POTENTIAL IMPACTS

4.1 Project Description



Figure 7: Architectural rendering of Proposed Project, view looking east (Steinberg Hart, July 13, 2023).

The Proposed Project includes the demolition of the Beverly Plaza Shopping Center, which consists of a one- to two-story commercial strip mall that includes commercial retail and restaurant uses, and its associated surface parking lot, along with the demolition of one adjacent commercial building to the immediate southeast with associated rear surface parking (a total of approximately 22,494 square feet of existing floor area), for the new construction, use, and maintenance of an eight-story (100 feet in height, including roof appurtenances) mixed-use building with 126 multi-family residential dwelling units, of which 15 percent of the permitted base density (14 units) would be reserved at the Very Low Income level, and 11,615 square feet of ground floor commercial retail/restaurant uses. The Proposed Project would also include three levels of subterranean parking. The Proposed Project would include 6,200 square feet of on-site open space areas, including outdoor decks and terraces and indoor recreational amenity rooms (i.e., fitness, spa, lounge areas). The Proposed Project would provide a total of 167 vehicle parking spaces as permitted under AB 2097 and 109 bicycle parking spaces in compliance with the requirements of the Los Angeles Municipal Code (LAMC). Primary vehicular access for residential and commercial uses would be provided by one entry-only driveway along South San Vicente Boulevard and two exit-only driveways (one along South San Vicente Boulevard and the other along the alleyway). Access to an on-site loading area would be provided from the alleyway. In total, the Proposed Project would include 208,901 square feet of total floor area resulting in a floor area ratio (FAR) of 6.3:1. The Proposed Project would provide one tree per every four residential units for a total of 32 trees on-site, per LAMC Section 12.21 G.2(a)(3). The Proposed Project would require approximately 46,000 cubic yards (cy) of soil to be exported.

4.2 Potential for Direct Impacts

As proposed, the Project does not appear to have the potential to cause direct impacts to historical resources.

As determined in the Phase I HRER, there are no historical resources on the Proposed Project site that would be directly impacted by the construction of the project. The Proposed Project is located fully outside the physical boundaries of the previously identified historical resources (see **Figure 2**). As such, no demolition, destruction, relocation, or alteration of any historical resource is proposed.

Vibration generated by adjacent construction activities can reach levels that cause damage, and therefore direct impacts, to certain types of vulnerable buildings and structures; however, 6727 Drexel Avenue and the 4th Street-Colgate Avenue Residential Historic District are a sufficient distance away from the Proposed Project site that they would be unlikely to be affected by reasonable levels of construction-related vibration. While closer to the Proposed Project site, the San Vicente Boulevard Median is unlikely to be susceptible to vibration as low-lying street infrastructure made from concrete.

4.3 For the reasons discussed above, the Proposed Project would not result in any change to the integrity of location, design, materials, workmanship, feeling, or association for the three historical resources in the vicinity. Their respective significance would not be materially impaired and they would remain eligible for listing. Potential for Indirect Impacts

As proposed, the Project does not appear to have the potential to cause indirect impacts to historical resources.

The Proposed Project would introduce a new visual element in the vicinity of historical resources in the form of a new building, which has the potential to impair the integrity of setting; however, integrity of setting is not an essential aspect of integrity for the San Vicente Boulevard Median or 6727 Drexel Avenue. That is, their ability to convey their significance does not rely on their relationship to physical features outside the historical resource boundary. Furthermore, the integrity of setting for both resources has already been diminished by ongoing development, and another instance of new construction in the vicinity is unlikely to impair the integrity of setting to such a degree that they would no longer be eligible for listing.

Districts like the 4th Street-Colgate Avenue Historic Districts rely on integrity of setting *within* the district boundaries, particularly the historic relationships between buildings and other district features such as sidewalks and ancillary buildings. This integrity of immediate setting helps differentiate districts as a visually and geographically unified entity.²⁷ While new construction within the boundaries has the potential to affect the integrity and significance of a historic district, new construction outside these boundaries is unlikely to impair the integrity of setting to such a degree that it would no longer be eligible for listing.

²⁷ National Register Bulletin 15, 46.

4.4 Potential for Cumulative Impacts

If the Proposed Project would not cause direct or indirect impacts to historical resources, as supported by the discussion above, it would not contribute to cumulative impacts on historical resources. Therefore, impacts to historical resources would not be cumulatively considerable.

5. CONCLUSIONS

For the reasons discussed above, the Proposed Project would not materially alter the characteristics of the San Vicente Boulevard Median, 6727 Drexel Avenue, or the 4th Street-Colgate Avenue Historic District that convey their significance and justify their eligibility for listing in the national, state, and/or local registers. As such, the anticipated impacts to historical resources would be less-than-significant and no mitigation would be required.

6. SOURCES CITED

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