



IV. ENVIRONMENTAL IMPACT ANALYSIS

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C. HISTORIC RESOURCES

This section identifies and evaluates historic resources that may be affected by implementation of the Sunset Avenue Project, assesses any potential impacts of the project on historic resources, and recommends mitigation. In the Initial Study regarding the West Los Angeles Transportation Facility, it was determined that that project would not have adverse impacts upon historic resources. However, precautionary mitigation recommended in the Initial Studies for both projects regarding accidental discovery of human remains from recent, historic or pre-historic periods, or of vertebrate fossil resources, during construction have been incorporated into the Mitigation Measures discussion (subsection IV.C.2.c.(2)) of this Section of the Draft EIR.

1. ENVIRONMENTAL SETTING

a. Historic Context

(1) Los Angeles

Prior to the arrival of the Spanish in California, the Los Angeles area was inhabited by the Gabriellino Indians. The earliest explorers to the region arrived in 1769, with the Gaspar de Portola Expedition. In 1781, Mexican settlers under the direction of Spanish Governor Felipe de Neve founded El Pueblo de La Reina de Los Angeles. Land to the west of the pueblo comprised four large ranchos. The largest of these was Rancho San Vicente y Santa Monica, encompassing most of the Santa Monica Mountains, Brentwood, West Los Angeles, and the City of Santa Monica. Rancho Boca de Santa Monica comprised the Pacific Palisades and Santa Monica Canyon. The present-day Palms area was situated within Rancho Rincon de los Bueyes while Rancho San Jose de Buenos Ayres encompassed present-day Westwood, land near Bel Air, Beverly Hills, and land to the north of Pico Boulevard. During the 1800s, many of these rancho lands were sold to several individuals and families.

In 1850, California was admitted as the 31st state in the Union. Many Americans flocked to California in hopes of finding gold. During the 1860s and 1870s, land to the west and north of the present-day Harbor Freeway was settled as Los Angeles began to expand. In the 1870s and 1880s, immigrants established Chinatown, to the north of Los Angeles. By the 1880s, southern California began attracting Midwesterners and Easterners with its new railroad lines. Streetcars

also made possible development of residential neighborhoods further west during the late 1880s and early 1890s.

(2) Venice Community

Venice of America, the name of the Santa Monica Bay beach resort created out of reclaimed marshland located south of the City of Santa Monica, was the result of the visionary efforts of a single entrepreneur, Abbot Kinney. In the early 1890s, Abbot Kinney formed a partnership with Francis Ryan to purchase and develop over one mile of unincorporated land south of Fremont Avenue (now Pico Boulevard) along the Pacific Ocean. Recognizing that a rail link to Los Angeles would be the key to development of the area, in 1893 Kinney donated land for the right of way and a depot to the Santa Fe railroad. Upon completion of the rail line, the partners began subdividing and selling small parcels. The community was given the name Ocean Park in 1895. With new business partners, Kinney formed the Ocean Park Improvement Company in 1902. Due to disagreements with his associates, however, Abbot Kinney quit the partnership in January 1904, taking the swampy southern portion of the Company's land for his imagined and soon to be conceived Venice project. Prior to relocating his business interests further south, however, Kinney had set in motion the incorporation of the partnership's property south of Marine Avenue (now Marine Street). On February 12, 1904 a successful vote created a new 6th class city called Ocean Park.⁵² This is the area in which the project site is located.

One of the driving factors behind the area's growth and development as a beach community were the large piers, bathhouses, boardwalks, plunges, and various pier amusements that were constructed along the Santa Monica Bay and into the Pacific Ocean in the first few decades of the twentieth century. Kinney's Venice of America opened on July 4, 1905, and was considered the "Coney Island of the Pacific" during its first decades of existence. It was primarily a resort town built to resemble Venice, Italy with its network of canals and a business district designed in a Venice-inspired architectural style. The one- and two-story residences constructed along its waterways, however, tended to be inspired not by Venice, but by the Craftsman architectural style popular at the time. Abbot Kinney Pier in Venice opened in 1908 and was the crowning attraction of Kinney's ambitious beach resort. In 1911, Kinney orchestrated the change of the city's name from Ocean Park to Venice to differentiate the town

⁵² *Much confusion arose from naming the new municipality located south of Marine Avenue "Ocean Park" due to the existing Ocean Park area of the City of Santa Monica that was situated north of Marine Avenue to the arroyo. The City of Ocean Park (not the Ocean Park area of Santa Monica) was renamed Venice in 1911 and eventually annexed by the City of Los Angeles in the 1920s.*

from the adjacent Ocean Park neighborhood of Santa Monica and to further promote his resort enterprises.⁵³

By the 1920s and 1930s, however, the discovery and extraction of oil in the Venice area dramatically changed the ambiance of the community. Further, following Kinney's death in 1920, the canals became increasingly desirable as potential automobile roadways. The combination of numerous oil rigs erected in the beach areas along with continuing traffic congestion resulted in the filling-in of most of Venice's canals during this time period and the loss of the area's earlier quaintness and charm.

(3) Ocean Park Car House/Metro Division 6 – Venice

Convenient access to Venice from Los Angeles, Santa Monica, and other southern California cities via the Los Angeles Pacific Railway and its successor the Pacific Electric Railway soon became a key element of the resort's success in these early decades. Many of the community's new residents came from the mid-west or the east coast for retirement or to begin lives anew. With the economic and population growth of Venice and other beach areas in the early decades of the twentieth century came more intensive residential and commercial development. Main Street, which runs along the east boundary of the project site, became the primary commercial artery, servicing permanent residents and visitors. Running along the project site's west boundary is an important north-south thoroughfare, Pacific Avenue, which was originally an electric trolley right-of-way that brought passengers directly to Venice and its amusements. It was to service the electric trolley cars traveling along this route that the Ocean Park Car House (located on the project site) was constructed in 1901.

The interurban electric railways were a significant transportation element in the overall economic and population growth of Southern California in the first half of the twentieth century. A vast network of independent interurban trolley lines with names such as the Los Angeles Pacific Railway, Los Angeles and Redondo Railway, and the Pasadena and Los Angeles Railway brought passengers to the far reaches of Southern California where land was available for development. It was the convenience, speed, and low cost of transportation afforded by the electric trolleys that resulted in the horizontal expansion of the region versus the vertical concentration of settlements seen in other parts of the country. By the mid-1910s, most of the independent interurban electric railway lines had been consolidated into the Pacific Electric Railway, including the Los Angeles Pacific Railway, which was the interurban line that had made Santa Monica, Ocean Park, and Venice easily accessible to settlers and visitors.

⁵³ Jeffrey Stanton, <http://naid.sppsr.ucla.edu/venice/>, 1996.

In 1901, on a large parcel (the project site) located on the east side of its new trolley right-of-way, the Los Angeles Pacific Railway Company erected the Ocean Park Car House and Power House, laid multiple service yard tracks, and installed a trolley car turnaround. The right-of-way, later known as “The Trolleyway,” (now Pacific Avenue) ran from Santa Monica through Ocean Park to Venice for convenient service from Los Angeles. Upon completion in 1901, the route was named the Venice Short Line. The function of the Car House, actually a pair of elongated wood and steel-framed gabled structures, was to provide service areas for the Venice Short Line trolley cars. The Power House, a large two-story masonry structure that was converted into an electrical Substation in 1904, provided the electricity that powered the electric trolleys. In 1911, the Pacific Electric Railway took over the Los Angeles Pacific Railway’s operations. For the next 39 years under the Pacific Electric banner, the Ocean Park Car House, Substation, and service yard supported the electric railway. On September 17, 1950, following the accelerated post-World War II decline of electric rail travel regionally and locally due to overwhelming competition from automobile and bus transportation, Pacific Electric’s Venice Short Line ceased operations. In late 1950, while still under Pacific Electric Railway management, the Ocean Park Car House was razed and the rail tracks removed so that the property could be prepared for conversion into a bus maintenance facility. All traces of the property’s history as a Pacific Electric Railway service operation were lost when the masonry electrical Substation structure was demolished in 1954.

Following the removal of the Car House and rail tracks, a new Pacific Electric Railway Company bus service facility was constructed in 1951 on the site. The facility consisted of an operations building and garage, a bus washer, a service station, and newly paved parking areas for buses. In 1954, Pacific Electric Railway Company’s bus passenger service was sold to Metropolitan Coach Lines which, in turn, transferred ownership of the property to the Metropolitan Transit Authority (the first Metro) in 1958. At that time the facility was named by Metro as Division 6 – Ocean Park. From 1958 until today (2004) the project site and associated buildings have experienced various alterations and upgrades under the successive ownership of the Metropolitan Transit Authority, Southern California Rapid Transit District, and the Los Angeles County Metropolitan Transportation Authority (the current owner). In 1992, while still under the auspices of the Southern California Rapid Transit District, a mural entitled “You Are Not Forgotten” was painted on the west-facing (Pacific Avenue) side of the bus washer wall by self-taught artist Peter Stewart. Figure IV.C-1 on page 170 illustrates the mural in its existing condition.

The Metro bus operation Division 6 – Venice (the name changed from Division 6 – Ocean Park in the 1960s) is one of 11 Metro bus operations divisions that are located throughout Los Angeles County. The bus operations and service facilities associated with Metro’s other divisions are functionally equivalent to the Division 6 – Venice property, differing only in the arrangement of the various structures.



Figure IV.C-1
Sunset Avenue Project
Vietnam POW/MIA Memorial Mural



b. Existing Conditions

The project site is located at 100 East Sunset Avenue and occupies an entire city block in the Venice Community of the City of Los Angeles and is located 0.3 mile south of the City of Los Angeles/City of Santa Monica boundary and 0.25 mile east of the Pacific Ocean. The site consists of a large one- and two-story office and bus maintenance building, a bus washing structure, a service station, a steam cleaning shed, and bus and automobile parking areas. A concrete wall surrounds most of the site.

(1) Survey Study Area Defined

The historic resources study area was identified based on the anticipated direct and indirect effects of the proposed project on potential historic resources. The study area was defined as the project site, which is bounded by Pacific Avenue on the west, Main Street on the east, Sunset Avenue to the north, and Thornton Place to the south. The 3.13 acre site consists of the Metropolitan Transportation Authority's Division 6 – Venice operations and service facility. All existing structures on the site are currently being utilized.

(2) Historic Resources within Study Area

The California Historical Resources Information system indicated that there are no properties listed in the California Historic Resources Inventory database maintained by the Office of Historic Preservation (OHP) within the project site. In addition, a review of literature data indicated that no previously recorded prehistoric sites exist within the study area.

The current survey process was conducted per OHP instructions, which gives a 45-year threshold for surveying properties for significance. During the current survey, two properties were identified within the study area. Summarized findings of the properties are noted in Table IV.C-1 on page 172.

Metro Division 6 – Venice Site and Associated Buildings. Completed in 1951 at a cost of approximately \$315,000, a new bus service facility was commissioned by the Pacific Electric Railway's bus division on the site of the company's recently demolished Ocean Park Car House and rail yard. With the masonry shell of the railway's obsolete electric substation still occupying the site's northeast corner (which wasn't demolished until 1954) the B&B Construction Company erected a new operations building and garage, a bus washer, and a service station on the south half of the property. Following rail track removal, newly paved concrete parking areas for accommodating up to 120 buses were poured on the site. A concrete retaining wall paralleling Main Street and a five foot wire fence surrounding the remainder of the property were also erected in 1951. Entrances were located at the corner of Main Street and Sunset Avenue and

Table IV.C-1

PROPERTIES SURVEYED WITHIN THE STUDY AREA

Address	Description	Year Built	Rating
1. 100 East Sunset Ave.	Metro Division 6 – Venice site and associated buildings	1951	6Z1
2. 100 East Sunset Ave.	Vietnam POW/MIA Memorial Mural	1992	5S3

6Z1 Property found ineligible for federal, state, and local designation.

5S3 Property found ineligible for the National Register, California Register, or for local designation but eligible for special consideration in the local planning process.

Source: PCR Services Corporation, 2004.

near the south end of the parcel that paralleled the defunct Trolleyway (which was not paved for automobile use as Pacific Avenue until later in the 1950s).

The combination operations building and garage, the main building on the site, was designed in an unadorned, utilitarian vernacular modern style. The first story of the approximately 17,000-sq.ft. building originally housed bus repair and inspection operations, a repair shop, a Trainmen’s Room, an office, and a store room. Designed in an “L”-shaped plan, two perpendicular one-story garage wings, one for inspection and servicing, the other for general repairs, meet at the building’s elbow where a two-story operations section is located. For easy bus maneuvering, the design eliminated most supporting columns at the garage entrances. Wood truss roofs cap each of the three sections of the reinforced concrete building. The facility’s second floor originally contained locker rooms, rest rooms, and business offices. An automatic bus washer costing approximately \$16,500 was erected in 1951 and sited along the west property line of the parcel near the northwest corner of the main building. The utilitarian bus washing structure features steel posts supporting a metal shed roof with a concrete block wall located on the structure’s west side. A service station was constructed east of the main building to supply diesel fuel, gasoline, and lubricating oil.

The property and associated buildings have experienced various alterations and upgrades under the successive ownership of the Metropolitan Transit Authority, Southern California Rapid Transit District, and the Los Angeles County Metropolitan Transportation Authority (the current owner). Upgrades include replacing the parcel’s remaining chain link fencing with concrete walls, resurfacing of the bus yard, installing new bus washing equipment, and erecting new yard lighting. On the main building, new garage doors have been installed and original first and second story fenestration has been replaced with metal sliders.

Since the demolition of the Ocean Park Car House, electric Substation, and removal of rail tracks in the 1950s, any association with the history of the Pacific Electric Railway has been

lost. Additionally, the site's association with public bus transportation since 1951 is not considered historically significant because Metro's Division 6 – Venice operations and bus service facility is one of 11 such facilities located throughout Los Angeles County that are functionally equivalent to the project site, differing only in the arrangement of the various structures. Architecturally, the main operations building and garage, which has been significantly modified over the years with new fenestration, is a fairly typical example of utilitarian, vernacular modern design as applied to an operations and service facility in the 1950s. Other structures located on the site, including the bus washer and fuel station, have been upgraded or replaced with new equipment since construction in 1951. Therefore, neither the site nor the associated buildings appear eligible for listing in the National Register, California Register, or as a City of Los Angeles Historic-Cultural Monument under any criteria. Further, in accordance with CEQA Guidelines Section 15064.5(a)(2)-(3), the property is not considered a historic resource.

Vietnam POW/MIA Memorial Mural. The west-facing (Pacific Avenue) side of the concrete block bus washer wall is now covered with a mural entitled “You Are Not Forgotten” that was completed in 1992. It measures approximately 90 feet wide by 15 feet high and is situated approximately halfway between Sunset and Thornton Avenues. The mural was designed and painted by Peter Stewart, a self-taught artist who is credited with this and other murals (National Veterans Mural on Bonsall Bridge at the West Los Angeles Veterans Administration Facility) around the city. The mural is a memorial to the soldiers of the Vietnam War who were classified as Missing in Action (MIA) or Prisoners of War (POW). Included on the wall are 2,273 names of the soldiers unaccounted for in Southeast Asia. The project was done in part to raise funds for the Vietnam Veterans Aid Foundation.

Murals are an integral component of cultural expression within the City of Los Angeles. The Deputy Historic Preservation Officer of the Planning Department oversees the extensive Mural Program that includes the permitting, preservation, and conservation of murals throughout the city. The Department also maintains a database of all permitted murals. The Vietnam POW/MIA Memorial Mural located on the west-facing wall of the bus washing structure is a permitted mural in the City of Los Angeles. The United States Congress and California legislature have enacted laws (Visual Artists Rights Act, 17 USC Sections 101 et seq. and the California Art Preservation Act, Civil Code Sections 987 et seq. respectfully) which provide limited protections to murals that fall within their provisions. In certain circumstances, these laws require that property owners provide appropriate notice to artists of the intent to alter, remove, or destroy murals. As a relatively recent work of art, the mural appears ineligible for listing in the National Register, California Register, or as a City of Los Angeles Historic-Cultural Monument under any criteria, although the mural should be given special consideration in the local planning process. However, in light of relevant federal, state and local laws and regulations concerning murals, the Vietnam POW/MIA Memorial Mural can be looked upon as a historic resource pursuant to Section 15064.5(a)(2) of the CEQA Guidelines.

c. Regulatory Framework

Numerous laws and regulations require federal, State, and local agencies to consider the effects of a proposed project on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies (e.g. State Historic Preservation Office and the Advisory Council on Historic Preservation). Relevant to this project, the National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); and the California Register of Historical Resources, Public Resources Code (PRC) 5024, are the primary federal and State laws governing and affecting preservation of historic resources of national, State, regional, and local significance. Additional regulations pertinent to the project include the U.S. Secretary of the Interior’s Standards for Rehabilitation of Historic Buildings, the Americans With Disabilities Act, the State Historical Building Code, and the City of Los Angeles Cultural Heritage Ordinance.

(1) Federal Level

National Register of Historic Places. First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (National Register) was established by the National Historic Preservation Act 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.”⁵⁴ The National Register recognizes properties that are significant at the national, State and local levels.

Secretary of the Interior’s Standards. The Secretary of the Interior has promulgated Standards for Rehabilitation of Historic Buildings (Standards).⁵⁵ These Standards may be used by the United States Department of the Interior, National Park Service (NPS) and other federal, State, and local agencies in reviewing and approving work to be performed on historic buildings. The Standards were written to “assist the long-term preservation of a property’s significance through the preservation of historic materials and features. The Standards pertain to historic properties of all materials, construction types, sizes, and occupancy and encompass the exterior

⁵⁴ *Code of Federal Regulations (CFR), 36 Section 60.2.*

⁵⁵ *The Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, U.S. Department of the Interior, National Park Service, Preservation Assistance Division, 1990. Also see 36 CFR § 67.7.*

and interior of the buildings. They also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction."⁵⁶

Americans with Disabilities Act. The Americans with Disabilities Act (ADA) was signed into law in July 1990.⁵⁷ This civil rights statute applies to employment, as well as access to public structures and services or "public accommodations" owned or operated by private entities. In general, alterations to buildings subject to ADA must provide for disabled access. However, there are special rules and minimum access requirements where an alteration "would threaten or destroy the historic significance" of a historic building. Historic buildings include those eligible for listing in the National Register of Historic Places or designated under State or local law.⁵⁸ To use the minimum requirements, consultation is required with the State Office of Historic Preservation and, in the case of projects subject to Section 106, with the Advisory Council on Historic Preservation (ACHP).⁵⁹

(2) State Level

The State implements the NHPA through its statewide comprehensive resource surveys and preservation programs. The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also maintains the California Historic Resources Inventory. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State's jurisdictions.

California Environmental Quality Act. Under CEQA, a "project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."⁶⁰ This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historical resource. If so, then the second part involves determining whether the project may involve a "substantial adverse change in the significance" of the historical resource. To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted in final form on October 26, 1998 with the addition of CEQA Guideline Section 15064.5. The new

⁵⁶ *Secretary of Interior's Standards*, page 5.

⁵⁷ 42 U.S.C. §§ 12101, *et seq.*

⁵⁸ *See* 28 CFR § 36.405.

⁵⁹ *See* § 4.1.7 of Appendix A of the 36 CFR Part 800 Regulations.

⁶⁰ *California Public Resources Code Section 21084.1. Added in 1992 by AB 2881.*

CEQA Guidelines provide that for the purposes of CEQA compliance, the term “historical resources” shall include the following:⁶¹

- “A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements in section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources, including the following:
 - a. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
 - b. Is associated with the lives of persons important in our past;
 - c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - d. Has yielded, or may be likely to yield, information important in prehistory or history.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that

⁶¹ *State CEQA Guidelines, 14 CCR Section 15064.5(a).*

the resource may be a historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.”

California Register of Historical Resources. Created by Assembly Bill 2881 which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”⁶² The criteria for eligibility for the California Register are based upon National Register criteria.⁶³ Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register of Historic Places.⁶⁴

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

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places.
- California Registered Historical Landmarks from No. 770 onward.
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources which may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5.
- Individual historical resources.
- Historical resources contributing to historic districts.
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

⁶² *California Public Resources Code Section 5024.1(a).*

⁶³ *California Public Resources Code § 5024.1(b).*

(3) Local Level – Los Angeles

City of Los Angeles Historic-Cultural Monuments. The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962, which defines Los Angeles Historic-Cultural Monuments (LAHCMs) for the City. According to the ordinance, LAHCMs are sites, buildings, or structures of particular historic or cultural significance to the City of Los Angeles in which the broad cultural, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics and are associated with a notable architect. These LAHCMs are regulated by the City’s Cultural Heritage Commission, which reviews permits to alter, relocate, or demolish these landmarks.

2. PROJECT IMPACTS

a. Methodology

In order to identify and evaluate historic resources, a multi-step methodology was utilized. Record searches to identify previously documented historic resources were conducted. This search included a review of the National Register of Historic Places and its annual updates, determinations of eligibility for National Register listings, and California Historical Resources Inventory database maintained by the State Office of Historic Preservation (OHP), and the City of Los Angeles Historic-Cultural Monuments list. Site inspections were made to assess existing conditions, define the historic resources study area, document potentially significant properties, and identify character-defining features of those properties evaluated as significant. A reconnaissance survey of the study area, including photography and background research, was then made. Additional background and site-specific research was conducted in order to evaluate historic resources within their historic context. National Register of Historic Places, California Register of Historical Resources, and the local city criteria were employed to assess the significance of properties.

A records search was conducted by the South Central Coastal Information Center at California State University, Fullerton to identify previously documented prehistoric and historic archaeological resources in and around the project site. Further, a paleontological resources records search of the project area was conducted by the Natural History Museum of Los Angeles County.

⁶⁴ *California Public Resources Code § 5024.1(d).*

b. Thresholds of Significance

(1) CEQA Guidelines

The current CEQA Guidelines state that a project involves a “substantial adverse change” when one or more of the following occurs:

- Substantial adverse change in the significance of a historical resource means 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.⁶⁵
- The significance of a historical resource is materially impaired when a project:⁶⁶
 - a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; 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 Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, 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 California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Secretary of the Interior’s Standards for Rehabilitation (Standards) are codified at 36 Code of Federal Regulations (CFR) Section 67.7. The Standards are designed to ensure that rehabilitation does not impair the significance of a historic property. In most circumstances, the Standards are relevant in assessing whether there is a substantial adverse change under CEQA. Section 15064.5b(3) of the CEQA Guidelines states in part that “...a project that follows the

⁶⁵ *State CEQA Guidelines, 14 CCR Section 15064.5(b)(1).*

⁶⁶ *State CEQA Guidelines, 14 CCR Section 15064.5(b)(2).*

Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource.”

(2) City of Los Angeles Thresholds of Significance

The following thresholds of significance are applied to the subject project as set forth in the City of Los Angeles’ “L.A. CEQA Thresholds Guide,” which states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic 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.

Under significance thresholds that are based on these factors, a project would have a significant impact on historic resources, if:

- The project would demolish, destruct, relocate, or alter a historical resource such that the significance of the historical resource would be materially impaired; or
- The project would reduce the integrity or significance of important resources on the site or in the vicinity.

c. Analysis of Project Impacts

(1) Impacts

Metro Division 6 – Venice Site and Associated Buildings. Under the proposed project, all of the buildings associated with the project site are scheduled for demolition and the site

cleared for new construction. The Metro Division 6 – Venice site and associated buildings appear ineligible for listing in the National Register, California Register, and for local designation. A final determination of eligibility will be the responsibility of the State Historic Preservation Officer with the Office of Historic Preservation. In addition, the property does not meet the criteria for consideration as a historic resource for the purposes of CEQA compliance. Therefore, the project would not result in a significant impact to historic or cultural resources.

Vietnam POW/MIA Memorial Mural. Under the proposed project, the concrete block west wall of the bus washing structure upon which the Vietnam POW/MIA Memorial Mural is painted is to be removed. Its retention in place and unaltered is infeasible since its size, location and content would not be compatible with residential development of this site. Although the mural appears ineligible for the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument, it is eligible for special consideration in the local planning process. Further, in light of relevant federal, state and local laws and regulations related to murals, the Vietnam POW/MIA Memorial Mural can be looked upon as a historic resource for the purposes of CEQA. Under this project, direct impacts would occur to the mural that would pose a significant impact on what may be considered to be a historic or cultural resource. Therefore, mitigation measures are recommended to reduce impacts to a less than significant level.

3. CUMULATIVE IMPACT ANALYSIS

None of the related projects identified in Section III.B, Related Projects, of this Draft EIR is known to adversely effect cultural resources of any sort. Although murals are a well-represented form of public art in the surrounding Venice and Santa Monica area with specialized maintenance challenges, none is known to be threatened with removal. Therefore, cumulative impacts considered in conjunction with the Sunset Avenue Project's proposed removal of the on-site MIA/POW Mural would not expand the assessment of this project impact to a significant adverse level. However, demolition of the Vietnam POW/MIA Memorial Mural would result in an adverse impact.

4. MITIGATION MEASURES

a. Metro Division 6 – Venice Site and Associated Buildings

No mitigation measures regarding the buildings and structures located on this property are required to implement the proposed project because the property is not considered a historic resource for the purposes of CEQA.

b. Vietnam POW/MIA Memorial Mural

The following mitigation measures address the proposed project and its potential to significantly impact the Vietnam POW/MIA Memorial Mural identified as a historic resource.

Mitigation Measure Sunset-C.1: Relocation. The feasibility of relocating the mural to an off-site location should be explored to mitigate project impacts on this historic resource. A determination of a reasonable and acceptable cost for the mural's relocation will be established between the Applicant, Metro, and a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. Relocation of the mural in whole to another publicly accessible location within the project area, if conducted in accordance with the guidelines recommended by the National Park Service that are outlined in the booklet "Moving Historic Buildings" by John Obed Curtis (1979), would fully mitigate the impact associated with this historic resource and the proposed project. Additionally, relocation of the mural off-site to a location with similar or compatible historical context (i.e. along a public roadway) would also fully mitigate the impact. However, prior to any relocation efforts the physical condition of the mural should be considered, assessed, and documented by a qualified historic architect and structural engineer. Additionally, the cost of relocation versus the overall historical and artistic value of the mural should be quantified in that assessment, to further evaluate relocation feasibility. The relocation plan shall also be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional. Additionally, the plan shall be reviewed and approved by the Deputy Historic Preservation Officer of the City of Los Angeles' Planning Department.⁶⁷ Because this mitigation, with the recommended cost to Applicant limitation, would not directly or indirectly affect the objectives of the proposed project, it appears feasible. (This measure addresses impacts regarding the Vietnam POW/MIA Memorial Mural as discussed beginning on page 181 of this Section of the Draft EIR.)

Mitigation Measure Sunset-C.2: Photography and Recordation. Prior to alteration, relocation, or demolition of the mural, a photographic documentation report shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. This report shall document the significance of the mural and its physical conditions, both historic and current through photographs and text. Photographic documentation should be taken utilizing 35-mm black and white film. The photographer should be familiar with the recordation of historic resources.

⁶⁷ *Effective July 1, 2004, the City Planning Department has taken over functions previously performed by the Cultural Affairs Department.*

Photographs should be prepared in a format consistent with the Historic American Buildings Survey (HABS) standards for field photography. Copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Planning Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy. (This measure addresses impacts regarding the Vietnam POW/MIA Memorial Mural as discussed beginning on page 181 of this Section of the Draft EIR.)

c. Accidental Discovery of Human Remains or Vertebrate Fossil Resources

(1) West Los Angeles Transportation Facility Site

Mitigation Measure WLA-C.1: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels. (This measure addresses impacts regarding the accidental discovery of fossil resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

Mitigation Measure WLA-C.2: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels. (This measure addresses impacts regarding the accidental discovery of archaeological resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

(2) Sunset Avenue Site

Mitigation Measure Sunset-C.3: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-

than-significant levels. (This measure addresses impacts regarding the accidental discovery of fossil resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

Mitigation Measure Sunset-C.4: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels. (This measure addresses impacts regarding the accidental discovery of archaeological resources as discussed in Appendix A, Initial Study, of this Draft EIR.)

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Under CEQA, the recommended mitigation measures would reduce the potential adverse impacts of both projects on a recognized cultural resource (the MIA/POW Mural) and on accidental discovery of the unknown, unanticipated vertebrate, fossil or traditional burial resources to less-than-significant levels.