

IV. Environmental Impact Analysis

D.1 Cultural Resources—Historic Resources

1. Introduction

The following section of the Draft EIR evaluates potential impacts related to historic resources associated with development of the Proposed Project. The analysis is based on the following study and correspondence: Baldwin Hills Crenshaw Plaza Historic Resource Report (the “Historic Resource Report”) prepared by Christopher A. Joseph and Associates, July 2009 (Appendix D1 to this Draft EIR) and written correspondence from the South Central Coastal Information Center at California State University, Fullerton, on April 16, 2009 (Appendix D2 to this Draft EIR).

2. Environmental Setting

Generally, a lead agency must consider a property a historic resource under CEQA if it is eligible for listing in the National or California Register of Historical Resources (the “California Register”). The California Register is modeled after the National Register of Historic Places (the “National Register”). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historic resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.¹ The National and California Register designation programs are discussed below. In addition, the Los Angeles Cultural Heritage Ordinance is discussed as a potentially applicable local designation program.

a. Regulatory Framework

(1) Federal Level

(a) National Register of Historic Places

The National Historic Preservation Act established the National Register of Historic Places (NRHP) to recognize resources associated with the country’s history and heritage.

¹ *Public Resources Code Section 5024.1 and 14 CCR Section 4850.*

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.”²

To be eligible for listing in the National Register, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of four established criteria:³

1. Associated with events that have made a significant contribution to the broad patterns of our history; or
2. Associated with the lives of persons significant in our past; or
3. 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,
4. Yield, or may be likely to yield, information important in prehistory or history.

(i) Physical Integrity

According to National Register Bulletin #15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance.” Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity. They are: feeling, association, workmanship, location, design, setting, and materials.⁴

(ii) Context

To be eligible for listing in the National Register, a property must also be significant within an historic context. National Register Bulletin #15 states that the significance of an 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

² 36 Code of Federal Regulations, Part 60.2.

³ 36 Code of Federal Regulations, Part 60.4.

⁴ National Register Bulletin #15, pp. 44-45.

site is understood and its meaning... is made clear.”⁵ 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.

(iii) Period of Significance

To be eligible for listing in the National Register, a property must be historically or architecturally significant within a specific period of time. The National Register defines the “period of significance” as “the length of time when a property was associated with important events, activities, or persons, or attained the characteristics which qualify it for National Register listing.”⁶ The period of significance usually begins with the date when significant activities or events began giving the property its historic significance; this is often a date of construction. National Register Bulletin #15 provides guidelines for selecting and evaluating the periods of significance relevant to each Criterion:

- Criterion A: For the site of an important event, the period of significance is the time when the event occurred. For properties associated with historic trends, such as commercial development, the period of significance is the span of time when the property actively contributed to the trend.
- Criterion B: The period of significance for a property is usually the length of time the property was associated with the important person.
- Criterion C: For architecturally significant properties, the period of significance is the date of construction and/or the dates of any significant alterations and additions.
- Criterion D: The period of significance for an archaeological site is the estimated time when it was occupied or used for reasons related to its importance, for example, 3000–2500 B.C.

The following additional guidelines on periods of significance pertain to all Criteria:

- The property must possess historic integrity for all periods of significance entered.
- Continued use or activity does not necessarily justify continuing the period of significance. The period of significance is based upon the time when the property made the contributions or achieved the character on which significance is based.

⁵ *Ibid.*, p. 7.

⁶ *National Register Bulletin #15*, p. 7.

- 50 years ago is used as the closing date for periods of significance where activities begun historically continued to have importance and no more specific date can be defined to end the historic period. (Events and activities occurring within the past 50 years must be exceptionally important to be recognized as “historic” and to justify extending a period of significance beyond the limit of 50 years ago.)

(iv) Types of Historic Properties

The National Register recognizes various types of historic properties. The categories for documentation are building, district, site, structure, or object. Each type of historic property is discussed below under separate headings.

Building

A building is generally considered to be a structure constructed for the purpose of creating human shelter. When evaluating a property for the National Register, the property is classified according to the main resource. For example, a property containing a house, garage, and barn would be considered a building, because the house would be considered the main resource, and the garage and barn would be considered secondary resources. A building is evaluated individually.

Historic District

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as a historic district. The National Park Service defines a historic district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”⁷ 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.”⁸ A district is further 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.⁹ A district’s significance and historic integrity should help determine the boundaries. Other factors include:

⁷ *National Register Bulletin #15, p. 7.*

⁸ *Ibid.*

⁹ *36 Code of Federal Regulations 60.3(d).*

- Visual barriers that mark a change in 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.¹⁰

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological 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 on the National Register.¹¹

Structure

The term “structure” is used to distinguish buildings from those functional constructions made usually for purposes other than creating human shelter. Examples of structures (as opposed to buildings) include bridges, tunnels, canals, systems of roadways, and baths, among others.

Object

The term “object” is used to distinguish buildings and structures from those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment. Examples of objects include sculpture, monuments, boundary markers, statuary, and fountains.

¹⁰ *National Register Bulletin #21.*

¹¹ *National Register Bulletin #12.*

(2) State Level

(a) 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 citizens to identify historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.

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.¹² The California Register automatically includes the following:

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

The criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified numerically instead of alphabetically. To be eligible for listing in the California Register, a property must be at least 50 years of age and possess significance at the local, state, or national level, under one or more of the following four criteria:

- Criterion 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
- Criterion 2: It is associated with the lives of persons important to local, California, or national history; or
- Criterion 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

¹² *Public Resource Code Section 5024.1.*

- Criterion 4: It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A resource less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historic importance. While the enabling legislation for the California Register is less rigorous regarding the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹³

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:¹⁴

1. The survey has been or will be included in the State Historic Resources Inventory.
2. The survey and the survey documentation were prepared in accordance with OHP procedures and requirements.
3. The resource is evaluated and determined by the OHP to have a significance rating of Category 1 to 5 on a DPR Form 523.
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 which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

(i) OHP Survey Methodology

The evaluation instructions and classification system prescribed by OHP in its Instructions for Recording Historical Resources provide a three-digit evaluation code for use in classifying potential historic resources. In 2003, the codes were revised to address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

¹³ Public Resource Code Section 4852.

¹⁴ Public Resources Code Section 5024.1.

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; or
7. Not evaluated or needs reevaluation.

(3) Local Level

(a) City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance (the “Ordinance”) in 1962 and amended it in 2007 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. Section 22.171.7 of the Ordinance states that:

For purposes of this article, a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

b. Existing Conditions at the Project Site

The Project Site is generally located at the intersection of Crenshaw Boulevard and Martin Luther King Jr. Boulevard. The Project Site occupies two full blocks bounded by 39th Street to the north, Crenshaw Boulevard to the east, Stocker Street to the southeast,

Santa Rosalia Drive to the southwest, and Marlton Avenue to the northwest. Martin Luther King Jr. Boulevard bisects the Project Site. The May Company building and a shopping center are located on the portion north of Martin Luther King Jr. Boulevard, and the Project Site south of Martin Luther King Jr. Boulevard contains the Broadway building, an enclosed mall, the Sears building, a movie theater, and numerous freestanding commercial buildings (see Figure IV.D.1-2 through Figure IV.D.1-5 on pages IV.D.1-14 and IV.D.1-16 through IV.D.1-18).

The portion of the Project Site north of Martin Luther King Jr. Boulevard is bisected by Baldwin Villa Driveway, which runs east-west. The area south of Baldwin Villa Driveway contains the May Company building, and an associated parking lot north of the building. The May Company building is considered a historic resource, and is discussed in detail later in this Section. The area north of the Baldwin Villa Driveway contains an Albertson's grocery store and retail strip mall with an associated surface parking lot. Although the details evoke the Art Deco style, the buildings are vernacular, modern and of recent construction. Building permits for the retail buildings and grocery store were issued in 1991. The shopping center is an ordinary example of a modern commercial shopping center oriented towards an expansive surface parking lot fronting the street. Thus, the buildings associated with the shopping center in this portion of the Project Site were eliminated as potential historic resources due not only to their age, but also the fact that they are vernacular, modern and of recent construction.

The portion of the Project Site south of Martin Luther King Jr. Boulevard contains the Broadway building, an enclosed mall, the Sears building, and various freestanding commercial buildings. The Broadway building is considered a historic resource, and is discussed in detail later in this Section. The mall is connected to the May Company building by an elevated enclosed pedestrian bridge over Martin Luther King Jr. Boulevard. The enclosed mall, constructed in the late 1980s, is composed of two levels and consists of a vernacular design without unique or distinctive design features. Storefronts line the east and west sides of the building. On the first level, the space between the east and west storefronts forms a broad walkway. On the second level, there is a balcony on either side, forming a walkway for the west storefronts, and a walkway for the east storefront. In a somewhat symmetrical arrangement, space between the two walkways is open, creating a two-story courtyard volume to the first level. The mall building (apart from the attached Broadway building) was dismissed from further historical analysis due to a lack of distinctive architectural features, recent construction, vernacular design, as well as its age.

The Sears building is connected to the southwest corner of the mall building. The building represents a bookend to the mall complex and is oriented toward the parking area. The building is a large, unadorned box. The single design element is the geometric-patterned window over the entrance. However, the style of the building remains

vernacular, and of modern construction. As such, it was dismissed as a potential historic resource.

The Rave Theater building is located directly west of the mall building, although it is not attached to the mall. The boxy, rectangular building is of modern construction, less than 25 years old, and lacks a discernable style or theme. The movie theater was built in 1995 and is not a potential historic resource.

In addition to the Broadway building, the mall building and the Sears building, and the Rave Theater, there are numerous commercial buildings on the block south of Martin Luther King Jr. Boulevard. The buildings include:

- The One United Bank building located at 4143 S. Crenshaw Blvd. (built in 1990);
- The International House of Pancakes (IHOP) building located at 3625 W. Stocker Street (built in 1955);
- A Wells Fargo Bank Building located at 3649 W. Stocker Street (built in 1990);
- A Staples retail store located at 3701 W. Santa Rosalia Drive (built in 2011);
- The Post and Beam restaurant building located at 3767–87 Santa Rosalia Drive (remodeled in 2011);
- The Debbie Allen Dance Academy building located at 4090 S. Marlton Avenue (built in 1990);
- The Fatburger restaurant located at 4070 S. Marlton Avenue (built in 1995); and
- The Taco Bell fast food restaurant located at 4050 S. Marlton Avenue (built in 1989).

The buildings comprise a variety of vernacular styles of modern construction, yet many of them pay homage to the historic buildings through Art Deco and Streamline Moderne motifs, such as continuous metal overhangs, and the prevalent use of glass block, which was used in the Broadway building (see Figure IV.D.1-2 through Figure IV.D.1-5 on pages IV.D.1-14 and IV.D.1-16 through IV.D.1-18). All of the buildings identified above are not considered as potential historic resources due to a lack of age and/or architectural character.

(1) Historic Context

(a) Broadway-Crenshaw Center

When the Broadway-Crenshaw Center opened in November of 1947, it was built across the street from the May Company department store, which had opened the previous month, and the two stores were fierce competitors. The original Broadway-Crenshaw shopping center included the following: a Broadway department store, a Woolworth's variety store, a Vons supermarket, a bank, a drugstore, and several smaller retail stores. Soon an office building for Pacific Telephone and Telegraph Co., and a gas station were added. An aerial photograph depicting the early development of the site circa 1950 is shown in Figure IV.D.1-1 on page IV.D.1-12.

During this time, the new trend of adding large supermarkets and department stores to commercial strips had emerged, and commercial strips were being transformed into plazas designed for the automobile. The Broadway-Crenshaw Center was part of this new trend, and its popularity set a precedent for future commercial shopping centers, which imitated many of its successful design features. These included the concept of a department store in conjunction with smaller retail stores, paired department stores, an expansive parking lot, and an underground delivery staging area, which kept unsightly trash bins and delivery trucks out of sight.

The development of the Baldwin Hills Crenshaw Plaza in 1988–1989 affected the integrity of the Project Site as a whole. It included the addition of an enclosed mall to the rear of the Broadway building, a large unadorned above-ground parking structure and the construction of a pedestrian bridge over Martin Luther King Jr. Boulevard to the May Company building. The Woolworth's building was among those demolished to make room for the multi-level parking garage and parking lot. The Broadway department store eventually became Walmart and the May Company department store eventually became Macy's. Further subsequent changes include the construction of the Magic Johnson Theaters to the west of the Broadway building in the 1990s.

The Project Site does not qualify as a potential historic district because all of the original buildings from the Broadway-Crenshaw Center have been demolished, with the exception of the Broadway building.

(i) Previous Historic Evaluations

The California Historical Resources Inventory System (CHRIS) includes properties listed and determined eligible for listing in the National Register of Historic Places, listed and determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks and Points of Historical Interest, as well as



Source: Spencer Archives, Circa 1950.

properties that have been evaluated in historic resource surveys and other planning activities. Two buildings at the Project Site are included in CHRIS: the former May Company department store has a status code of 2S2, and the former Broadway department store has a status code of 3S. A status code of 2S2 means that the building has been formally determined eligible for listing in the National Register of Historic Places, while a status code of 3S means that the building appears to be eligible for listing in the National Register of Historic Places.

(2) Potential Historic Resources within the Proposed Project Site

(a) Broadway Building

The Broadway building, located south of Martin Luther King Jr. Boulevard, at the intersection of Martin Luther King Jr. Boulevard and Crenshaw Boulevard, was originally designed in 1945 by architect Albert B. Gardner in the Streamline Moderne style as part of the Broadway-Crenshaw Center. The building was redesigned by Edward W. Carter, the Executive Vice President of Broadway Department Store, Inc., who disliked the original floor plan design. The Broadway-Crenshaw Center, which included the Broadway department store, a Woolworth's variety store, a Vons supermarket, and several smaller retail stores, opened in November of 1947. As described below, the building was affected when the extensive development during 1988–1989 added an enclosed mall to the rear of the Broadway building, which completely obscured the west façade of the building as well as a portion of the north façade for the pedestrian bridge across Martin Luther King Jr. Boulevard. The Broadway building is currently occupied by Walmart. (See Figure IV.D.1-2 and Figure IV.D.1-4 on pages IV.D.1-14 and IV.D.1-17.)

The Broadway building, with its flat, stepped roof, continuous metal overhangs, and glass block windows, retains its distinct Moderne motif. The building's focal point is its northeast corner, which faces the intersection of Crenshaw Boulevard and Martin Luther King Jr. Boulevard. The corner element, which stands approximately two stories higher than the building's third story, consists of a tri-level stepped circular element and a hanging vertical sign, which currently bears the Walmart logo.

The building's height is stepped, varying from approximately three stories in height along Crenshaw Boulevard, to approximately five stories in height along the west façade, closest to the mall building. Along Crenshaw Boulevard, there are several banana trees, and various palm trees in a small landscaped area east of the Broadway building. The Broadway building is attached to the existing mall to the west, obscuring the lower levels of the western façade. The ground floor façades along the three exposed frontages are faced in black granite tiles and a wide metal canopy, supported by ornamental Moderne style brackets that wrap around the building above the ground floor. The original metal-trimmed display windows along the Crenshaw Boulevard and Martin Luther King Jr. Boulevard



View 4: The façade facing Martin Luther King, Jr. Boulevard



View 5: The windows on the façade facing Martin Luther King, Jr. Boulevard and across from the May Company building. The smaller black tile underneath the wrapping canopy filled in where the display windows used to be.

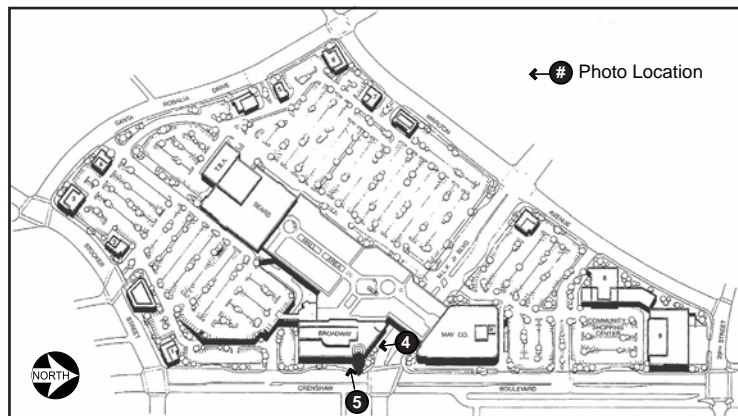


PHOTO LOCATION MAP

Source: Google Earth and Matrix Environmental, 2009.

façades have been filled in. The upper stories on all four of the façades display glass block windows, comprised of asymmetrically arranged glass bricks. The horizontal orientation of the glass block windows is accented by narrow overhangs with rounded corners, which project over the windows.

The main entrance is at the south elevation and is comprised of a pair of glass doors flush with a large display window with metal trim, neither of which appear to be original. Above the entrance is a large, stepped geometric element, which currently bears the Walmart logo. The teal, orange, cream, and white, color scheme and the geometric element are indicative of the Moderne style; however, the original portions of this element are indistinguishable from more recent additions and alterations.

The integrity of the building's interior was compromised when it was remodeled to accommodate Walmart in 2003–04. The interior has been stripped of all of its original features and finishes and virtually no historic fabric remains. While the original volume of the grand ground floor is intact, with high ceilings and some narrow, plain columns, none of the materials, including the floors, walls, ceiling, and lighting, are original. The materials on the upper floors have also been replaced with similar modern floors, walls, ceilings, and lighting. The upper floors feature drop ceilings as well as partition walls and displays, which mask most of the columns.

The Broadway building has a 3S code, as evaluated by CHRIS, and therefore, appears eligible for listing in the National Register. Based on the historical assessment conducted for this EIR, the building's integrity was compromised when its interior was gutted for Walmart in 2003–04. As such, it is no longer eligible for listing on the National Register but the building retains sufficient overall integrity to presently remain eligible for listing in the California Register and would continue to be considered a historic resource subject to CEQA.

(b) May Company Building

The May Company building is located north of Martin Luther King Jr. Boulevard, at the intersection of Martin Luther King Jr. Boulevard and Crenshaw Boulevard. It was designed in the Moderne architectural style by Albert C. Martin and Associates, known for many notable buildings in Los Angeles. The May Company department store opened on October 10, 1947. The May Company building is currently occupied by Macy's and is attached to the existing mall building by a pedestrian bridge over Martin Luther King Jr. Boulevard, which was built during the 1988–1989 development. As shown in Figure IV.D.1-3 through Figure IV.D.1-5 on pages IV.D.1-16 through IV.D.1-18, the building's Moderne style is recognizable by its asymmetric and curvilinear shape, the use of stepped shapes, and the highly ornamental detail and materials along the ground floor primary elevations.



View 1: The northwest corner of the May Company building that is surrounded by parking.



View 2: Entrance from Crenshaw Boulevard into parking lot area, near the underground tunnel.



View 3: The underground tunnel for loading and deliveries.



View 4: The glass display box windows of the May Company's building along Crenshaw Boulevard.

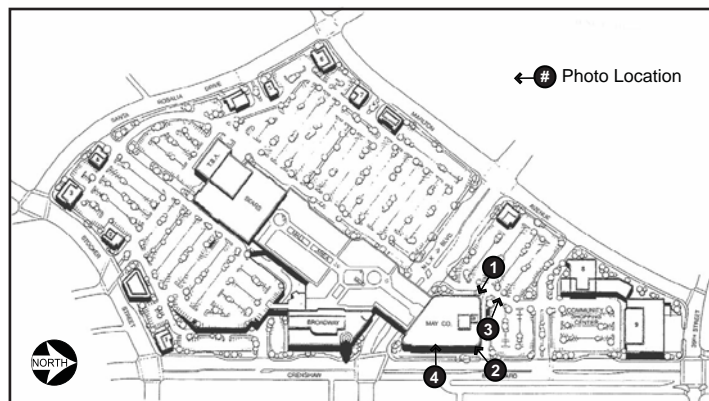


PHOTO LOCATION MAP

Source: Google Earth and Matrix Environmental, 2009.



View 5: The glass display windows facing the parking lot.



View 6: Distinctive clock on interior of May Company's building and above the entrance from Crenshaw Boulevard.



View 7: The former Broadway store (now Walmart) across from the former May Company store (now Macy's) with its old marquee sign.



View 8: The pedestrian bridge that connects the two buildings and a view of the May Company building. The unused signs are part of the original design. The rounded corner balconies used to have plants.

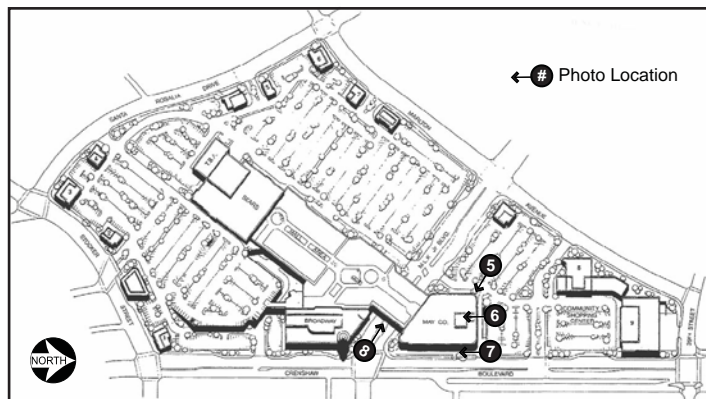


PHOTO LOCATION MAP

Source: Google Earth and Matrix Environmental, 2009.



View 9: Bank building that has integrated elements seen in the Broadway and May Company buildings, such as the glass block and vertical signage.



View 10: Supermarket that has integrated elements seen in the Broadway and May Company buildings, such as the glass block and the wrapping metallic canopies.



View 11: Bank building that has integrated elements seen in the Broadway and May Company buildings, such as the glass block and wrapping metallic canopies.



View 12: Creole Chef building has the curving shapes and vertical elements seen in the Broadway and May Company buildings.

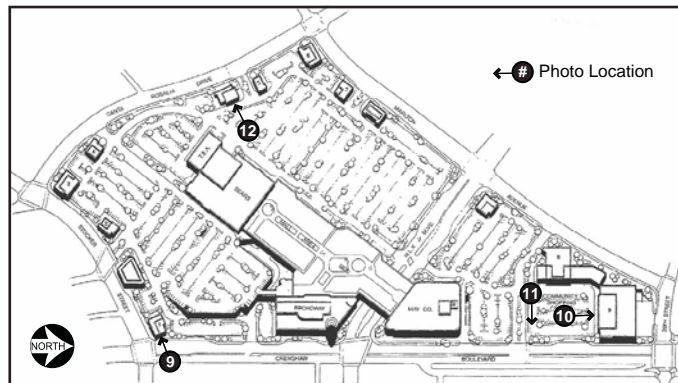


PHOTO LOCATION MAP

Source: Google Earth and Matrix Environmental, 2009.

The May Company building is approximately four stories in height, although the interior contains only three levels. The building's roofline is slightly stepped, with the centermost portion standing slightly taller than along the street façades. The building's plain upper stories are in contrast to its highly stylized ground floor. The corners of the building are rounded and the upper portion of each of the building's façades is faced with concrete plaster, scored into a grid pattern. The upper floors have occasional HVAC vents, but lack windows.

The east and west elevations, which face Crenshaw Boulevard and the parking lot respectively, feature highly stylized ground floor façades. These portions of the ground floor façade are faced in black terrazzo, interrupted by raised boxy display windows, which sit on top of black terrazzo pedestals. There are also some original floor-to-ceiling display windows with metal trim on the west façade. Ground-floor planters fill the space between the remaining original display windows. A wide canopy with a metal fascia runs along both the east and west façades and wraps around the corners. The original long rectangular windows above the canopy have been filled.

The north and south elevations are much simpler than the east and west elevations. The north elevation features black terrazzo along the entire ground-floor façade and lacks any detail on the upper stories. The south façade also lacks ornamental detail and is almost completely obscured by the pedestrian bridge over Martin Luther King Jr. Boulevard to the enclosed mall.

The building's focal point is its southeast corner, which faces the intersection of Crenshaw Boulevard and Martin Luther King Jr. Boulevard. This corner features a broader curve than the other corners of the building and is flanked by rectangular, vertical hanging signs, which are positioned on either side of the corner. These signs are currently blank. The building's entrances are set back and consist of glass doors, which do not appear to be original, and floor-to-ceiling glass windows with metal trim.

The interior of the building has undergone many alterations over the years, including changes to the partition walls and remodeling the basement and the first floor coffee shop, which no longer exists. The ground floor, with its high ceiling and lack of partitions, retains its original volume of the space. Narrow, plain support columns are symmetrically arranged throughout the space. The interior walls and recessed, round lighting fixtures are not original. However, the oversized Moderne clock above the main entrance appears to be original and is in good condition. The escalators, which are located in the center of the building, may also be original.

The second and third floors of the building are much plainer than the first floor and feature a drop ceiling and modern lighting. The original, plain columns remain exposed on

the upper floors. The second floor retains an open plan, similar to the ground floor. An overhanging Moderne-style partition element hangs from the ceiling in the areas surrounding the escalator shafts, and appears to be original. The third floor has been subdivided by floor-to-ceiling partition walls. The flooring on all three stories is inconsistent and includes a combination of carpet and tile. Some of the tile appears to be original.

The May Company building was previously evaluated as 2S2 by CHRIS, which means that it is an individual property determined eligible for the National Register by a consensus through the Section 106 process. Properties formally determined eligible for listing in the National Register are automatically included in the California Register. Despite the number of alterations to the building, it nonetheless is listed in the California Register. Therefore it is a historic resource subject to CEQA. The buildings are eligible for listing as Los Angeles Historic-Cultural Monuments for the same reasons they are eligible for listing in the California Register.

3. Environmental Impacts

a. Methodology

In accordance with guidance provided in the Environmental Checklist Form contained in Appendix G to the *State CEQA Guidelines*, lead agencies are encouraged to address the questions from the Checklist that are relevant to the Project's environmental effects. With respect to Cultural Resources, the following Checklist Question is addressed under the Environmental Impacts subheading below. Would the Project:

4. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

Section 15064.5 of the *State CEQA Guidelines* defines an historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the Proposed Project were to adversely affect a historical resource meeting one of the above definitions.

Section 15064.5 of the *State CEQA Guidelines* also clarifies which project impacts are considered to be significantly adverse.

- 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; or
- 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.

The *State CEQA Guidelines* further state that the significance of a historic resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.¹⁵

The following section of the Draft EIR evaluates potential impacts related to historic resources associated with development of the Proposed Project in accordance with the methodology and thresholds set forth in the *L.A. City CEQA Thresholds Guide*. The following analysis is based on the following study and correspondence:

- The Baldwin Hills Crenshaw Plaza Historic Resource Report (the “Historic Resource Report”) prepared by Christopher A. Joseph and Associates, July 2009 (Appendix D1 to this Draft EIR); and
- Written correspondence from the South Central Coastal Information Center at California State University, Fullerton, on April 16, 2009 (Appendix D2 to this Draft EIR).

b. Thresholds of Significance

As set forth in the *L.A. City CEQA Thresholds Guide*, a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in significance occurs if the project involves:

1. Demolition of a significant resource;
2. Relocation that does not maintain the integrity and significance of a significant resource;

¹⁵ *State CEQA Guidelines, Section 15064.5.*

3. 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
4. Construction that reduces the integrity or significance of important resources on site or in the vicinity.

Based on these factors, the Proposed 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. Regulatory Compliance Measures and Project Design Features

(1) Regulatory Compliance Measures

No regulatory compliance measures are required with regard to historical resources.

(2) Project Design Features

No specific project design features are proposed with regard to historical resources.

d. Project Impacts

(1) Demolition

As stated earlier, two structures on the Project Site have been identified as being potentially significant historic resources pursuant to CEQA. The Broadway Building has a resource code status of "3S" in the CHRIS database, meaning it appears to be eligible for listing in the National Register of Historic Places and, as such, is eligible for listing in the California Register. The May Company Building was previously evaluated as 2S2 by CHRIS, which means it is an individual property determined eligible for the National Register by consensus through the Section 106 process, and because of this status, is automatically listed in the California Register. For purposes of CEQA, both buildings are considered historic resources. However, the Proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

According to the *L.A. City CEQA Thresholds Guide*, a substantial adverse change in significance occurs if the Proposed Project would demolish a significant resource. No significant resource would be demolished. While there would be demolition of outbuildings, neither the May Company nor the Broadway buildings would be demolished, and these two buildings are the only potentially significant resources on-site. As such there would be no demolition of a significant resource.

(2) Relocation

The Proposed Project does not involve the relocation of significant historic resources, as the Proposed Project is the revitalization of the Baldwin Hills Crenshaw Plaza. Under the Proposed Project, the Broadway and May Company buildings would be preserved, rehabilitated and incorporated into the Proposed Project, and neither building would be relocated. As such, there would be no relocation that does not maintain the integrity and significance of a significant resource.

(3) Internal Changes

The Proposed Project would involve the rehabilitation and alteration of the Broadway and May Company buildings. The proposed rehabilitation and alteration of these buildings would include both interior and exterior improvements. While it is likely that tenant improvements would occur in the future to the interior of the Broadway and May Company buildings, there are no specific plans for the rehabilitation of the two buildings at this time. It is anticipated that such changes may include demising interior partitions, increasing common areas, adding or relocating escalators and elevators and creating new doors/windows on interior and exterior walls. Therefore, the buildings may be significantly impacted by inappropriate alterations that could further degrade their integrity if alterations are not performed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).

(4) Exterior Changes

Numerous additions have been made to the exterior of the buildings over the decades. From the 1940s through the 1990s a number of additions and changes were made that changed the two buildings in relation to the surrounding structures. These changes included the enclosure of display windows on the exterior of the Broadway building; construction of mall buildings to the south of the Broadway building; demolition of original mall structures to the south of the Broadway building; the construction of an enclosed mall to the southwest of the Broadway building; the construction of the pedestrian bridge across Martin Luther King Jr. Boulevard which obscured both the south façade of the May Company building and the north façade of the Broadway building; various signage changes to reflect the different tenants throughout the years; and the filling of original long

display windows on the May Company building above the canopy. Other changes throughout the years include the on-site landscaping, surface and structured parking, as well as the security fence installed in the 1990s.

Even with the continuous evolution of the Broadway and May Company buildings in relation to numerous physical changes which have caused the buildings to evolve over time, they still retain their primary use as commercial retail stores and, as such, would be consistent with Standard 1 of the Secretary of the Interior's Standards for Rehabilitation which indicates that the historic purpose of the property be retained. Consistent with this Standard and the commercial retail use, the Proposed Project would open the enclosed display windows on the exterior of the Broadway building; install new commercial signage on the exteriors of both buildings; install new doors on the exterior of the May Company building; and construct new retail, residential, office and hotel buildings within the Project Site.

Improvements to the exterior of the Broadway and May Company buildings would be installed so that they could be removed in the future so that the surfaces of both the Broadway and May Company buildings would be unimpaired. The use of the Baldwin Hills Crenshaw Plaza as a regional retail center would continue and be enhanced by the investment and improvements that would add retail/restaurant uses, new signage, opening of long closed display windows and addition of square footage in various buildings on the Project Site for retail, residential, hotel and office uses.

Location. Similar to the expansion of uses that have occurred throughout the existence of the Baldwin Hills Crenshaw Plaza, the proposed retail stores/restaurants would be designed to invigorate the shopping destination of the Project Site, maintain the historic use of these buildings, and provide amenities to residents and employees, both new and old, in the community. Opening of the Broadway building's closed display windows and the May Company building's new doors would also provide an aesthetically pleasing glimpse of merchandise and fashion available to shoppers; this would encourage and enhance the pedestrian shopping experience. Similarly, new signage to advertise merchandise would enhance the shopping experience, as it is customary to provide such advertising at shopping centers, as seen at The Grove and Fox Hills Mall. New residential, retail, office and hotel buildings would further invigorate the Project Site as not only a shopping destination, but as a multi-use regional center.

Design. Under the Proposed Project, the eastern façade of the May Company building would retain sufficient architectural integrity to convey the purpose and modernity of the building's original design. The aesthetic improvements with the restoration of the window displays and new doors would also reinforce the design of the buildings as shopping destinations. The location of the historic retail uses on site would remain. With signage that would be removable, the May Company and Broadway buildings' Art Deco

and Streamline Moderne design would still be visible and prominent. The design is the combination of elements that create the form, plan, space, structure, and style of a property and the proposed alterations would change only a small section of the May Company's building exterior. As the Baldwin Hills Crenshaw Plaza has historically evolved to accommodate enlargement and adaptations supporting patrons' needs with additions, the new retail/restaurant buildings would add more retail uses to further the retail and restaurant uses that have occurred on-site to make the Project Site a regional shopping destination for over 60 years. New signage would only enhance the retail operations. New buildings proposed as part of the Proposed Project would not abut or cover the May Company or Broadway buildings.

Based on these factors and analysis above, the Proposed Project would not demolish, destruct, relocate or alter a historical resource on the Project Site such that the significance of the historical resource would be materially impaired. No significant historic resources would be demolished as part of the Proposed Project. While there would be demolition of outbuildings and portions of mall structures, neither the May Company nor the Broadway buildings would be demolished, and these two buildings are the only potentially significant resources on-site. The Proposed Project would not involve a relocation of a significant historical resource. The Broadway and May Company buildings would be preserved, rehabilitated and incorporated into the Proposed Project, and neither building would be relocated. The Proposed Project would involve exterior modifications to the Broadway and May Company buildings. These modifications would not adversely impact historical resources such that the significance of the historical resources would be materially impaired. Future interior tenant improvements could result in interior modifications to the Broadway and May Company buildings that could further degrade their integrity of these buildings if alterations are not performed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Without conformance with the Secretary of the Interior's Standards, a significant impact would result.

The Proposed Project would not reduce the integrity or significance of important resources in the vicinity. Based on the information provided by the South Central Coastal Information Center in response to the NOP (see correspondence in Appendix A to this EIR), several historic resources have been identified in the immediate vicinity. The City of Los Angeles Historic Cultural Monuments lists the following four properties within a 0.5-mile radius of the Project Site:

- No. 487 Sanchez Ranch (3725 Don Felipe Drive): Portions of adobe structures were built in 1790 as part of the Rancho La Cienega o Paso de la Tijera. Archeological evidence indicates a prehistoric Native American village on this site.
- No. 620 Leimert Plaza (4395 Leimert Boulevard): A 1-acre public park.

- No. 679 Maverick's Flat (4225–4225½ South Crenshaw Boulevard): A restaurant and nightclub.
- No. 688 Holiday Bowl (3730 South Crenshaw Boulevard): Site of former Holiday Bowl bowling alley.

In addition, the California Register of Historical Resources lists two properties within a 0.5-mile radius. One property is the May Company Building located on the Project Site and is addressed in the analysis above. The other is the Oxford Square Craftsman District located north of Martin Luther King Jr. Boulevard on S. Victoria Ave. With respect to the off-site resources, due to the fact that none of the off-site resources identified above are located immediately adjacent to or within the primary viewshed of the Project Site, no indirect impacts would occur upon these resources. The redevelopment of the Project Site would thus have no direct or indirect impacts upon these historic resources.

4. Cumulative Impacts

Cumulative impacts on historic resources evaluate whether impacts of the Proposed Project and related projects, when taken as a whole, substantially diminish the number of historic resources within the same or similar context or property type. However, impacts to historic resources, if any, tend to be site-specific. It is anticipated that historic resources that are potentially affected by related projects would also be subject to the same requirements of CEQA as the Proposed Project. These determinations would be made on a case-by-case basis and the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Nevertheless, impacts for related projects could be determined to be significant and unavoidable. However, as the Proposed Project would include project-specific mitigation measures to ensure impacts on historic resources would be less than significant, the Proposed Project would not have a cumulatively considerable contribution to a significant impact, and thus, cumulative impacts would be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

No project design features are proposed with regard to historic resources.

b. Mitigation Measures

The following Mitigation Measures are recommended to address the Proposed Project's potential impact on historic resources:

Mitigation Measure D.1-1: Interior alterations to the two historic resources, the Broadway building and the May Company building, shall comply with the Secretary of the Interior's Standards for the Treatment for Historic Properties.

Mitigation Measure D.1-2: A qualified historic preservation consultant shall monitor the design and construction of the Proposed Project as it relates to historic resources to ensure that it complies with the Secretary of Interior's Standards for the Treatment of Historic Properties. The consultant shall prepare a report at the conclusion of the design and development phase of the Proposed Project analyzing compliance with the Standards. That report shall be submitted to the City of Los Angeles Office of Historic Resources for its review and approval. The consultant shall monitor the construction of the Proposed Project periodically.

6. Level of Significance After Mitigation

With the implementation of Mitigation Measures D.1-1 through D.1-2, the Proposed Project's impacts on historic resources would be less than significant.