

# **4.0 Guide to Preparation of Impact Analyses**

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## **XX. Cultural Resources—Historical Resources**

### **1. Introduction**

CEQA requires analysis of impacts to historical resources and defines historical resources as those listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register), those designated locally, and those that the City elects to treat as historical resources based on substantial evidence that they meet federal, state, or local listing criteria. Historical resources may include buildings, structures, sites, objects, and historic districts. Regulating historical resources falls within the jurisdiction of several levels of government: the framework for the identification of historical resources is established at the federal level, while the documentation and protection of such resources are often undertaken by state and local governments.

#### **a. Purpose of Analysis**

The purpose of a CEQA analysis of historical resources is to determine whether a proposed project will affect any historical resources, as defined by CEQA, either directly through demolition, relocation, alteration, etc. or indirectly by causing a substantial material change to the integrity of the resource or its immediate surroundings.

Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the project site contains or is in the immediate vicinity of a historical resource(s) and, if so, (2) a determination of whether the proposed project will result in a “substantial adverse change” in the significance of the resource(s). A “substantial adverse change” in the significance of a historical resource means an alteration that materially impairs the physical characteristics that convey its significance and justify its eligibility for listing in federal, state, or local registers.

#### **b. Regulatory Context**

There are several plans, policies, and programs regarding historic preservation at the federal, state, and local levels, including those listed below. Refer to the [City’s Regulatory Framework doc] for further discussion of each of these documents.

- National Historic Preservation Act of 1966, as amended (36 CFR Part 60)
- Secretary of the Interior’s Standards for the Treatment of Historic Properties (36 CFR Part 68)
- Native American Graves Protection and Repatriation Act (25 USC Chapter 3001-3013)
- Archaeological Resources Protection Act (16 USC Chapter 470)
- Archaeological Data Preservation Act (54 USC Chapter 3125)
- California Environmental Quality Act (PRC Section 21000 et seq)
- California Register of Historical Resources (PRC Section 5024.1)
- California Health and Safety Code
- California Public Resources Code
- California Historical Building Code (CCR Title 24, Part 8)
- California State Assembly Bill 52
- City of Los Angeles General Plan
- City of Los Angeles Cultural Heritage Ordinance (LAAC, Section 22.171)
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (LAMC Section 12.20.3)
- LAMC Section 91.106.4.5
- City of Los Angeles Historic Resources Survey (SurveyLA)

### **c. Historical Resource Fundamentals**

Historic preservation has four essential components: identification, evaluation, registration, and protection. There are numerous federal, state, and local historic preservation programs, including the California Register and the National Register of Historic Places (National Register), which are described in the [City’s Regulatory Framework doc]. While the programs are distinct in their procedures and benefits, they rely on a similar set of principles and best practices. The identification and evaluation of properties as potential historical resources typically occurs through a comprehensive historic resource survey, like SurveyLA, or the environmental review process for compliance with federal and state laws and regulations. The registration process involves a formal nomination and public hearing(s).

Registration programs include the National Register, California Register, California Historical Landmarks, California Points of Historical Interest, Los Angeles Historic-Cultural Monuments (HCMs), and Historic Preservation Overlay Zones (HPOZs). Properties listed or designated under these programs are protected in varying degrees. The following are terms often used in the identification, evaluation, registration, and protection of historical resources.

- **Impact Area**—The analysis of project impacts is based upon the Impact Area, which is the geographic area within which a project may directly or indirectly impact the character of historical resources. Impact Area is similar to the term Area of Potential Effect, which is defined in the regulations implementing Section 106 of the National Historic Preservation Act. The Impact Area will vary depending on the type of project proposed. In determining the Impact Area, three factors should be considered: (1) the existing setting of the project site; (2) the scale and nature of the proposed project; and (3) the impacts the project could have on historical resources, if such resources exist. The Impact Area may be limited to the project site if the scale and nature of proposed construction is similar to the existing setting. If that is not the case, the Impact Area may be expanded to include the entire city block on which the project site is located, adjacent parcels, and parcels on opposite block faces. The Impact Area for an individual project may be delineated as a uniform radius from the center of the project site but should rarely exceed a one-block or 1,000-foot distance. The guiding principle on delineating an Impact Area is that it should be commensurate with, and provide for, an appropriate level of effort to take into account a project's potential to impact historical resources.
- **Categories of Historical Resources/Historic District**—Historical resources may include buildings, structures, sites, objects, and historic districts. A district is defined as a concentration, linkage or continuity of buildings, structures, sites, and objects united historically or aesthetically by plan or physical development. Within a district, features are evaluated as contributing or non-contributing. Cultural landscapes may be vernacular or deliberately designed; in either case they may be documented as sites or districts, as appropriate. For a full definition of these categories, see the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*.
- **Significance**—The definition of historic significance used by the State Office of Historic Preservation (SOHP) in its administration of the California Register is based upon the following definition used by the National Park Service (NPS) for the National Register.<sup>1</sup> Historic significance is [defined as] the importance of a

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<sup>1</sup> U.S. Department of the Interior, *National Register Bulletin 16A: How to Complete the National Register Nomination Form* (Washington, DC: National Park Service, 1997), [www.nps.gov/nr/publications/bulletins/nrb16a/](http://www.nps.gov/nr/publications/bulletins/nrb16a/), accessed April 2018.

property to the history, architecture, archaeology, engineering, or culture of a community, State, or the nation. It is achieved in several ways:

- Association with important events, activities, or patterns
- Association with important persons
- Distinctive physical characteristics of design and construction
- Potential to yield important information

The City of Los Angeles uses a similar definition of historic significance. For the specific criteria for significance used in federal, state, and local landmark and historic district registration programs see the [City's Regulatory Framework doc].

- **Context**—The significance of a property can be judged only when it is evaluated within its historic context(s). Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning... is made clear.”<sup>2</sup> The *Los Angeles Citywide Historic Context Statement (LACHCS)* is used to identify the relevant contexts for judging the potential significance of a property within the City of Los Angeles. The *LACHCS* was developed by the Office of Historic Resources (OHR) for SurveyLA and is organized into nine broad contexts that cover the period from 1850 to 1980 and are specific to Los Angeles.
- **Integrity**—In addition to possessing significance within a historic context, to be eligible for listing in the National and California Registers a property must have integrity. Integrity is defined as the ability of a property to convey its significance.<sup>3</sup> Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed. A before and after assessment of integrity is often the basis for determining whether the significance of a historical resource will be materially impaired by a project, and thus result in a significant impact.

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<sup>2</sup> *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pages 7 and 8.*

<sup>3</sup> *National Register Bulletin #15, 44.*

## d. Related Topics Addressed in Other Sections of this CEQA Guide

- Visual impacts involving historical resources are addressed in Chapter 4.XX, **Aesthetics and Views**, based on a different set of criteria and thresholds than addressed herein. Aesthetic/view impacts consider the experiences of people who view the landscape, which may include historical resources, while historic impacts consider whether a project will adversely affect the integrity of historical resources.
- Effects from vibration on historical resources are addressed in Chapter 4.XX, **Noise and Vibration**. Vibration from construction activities has the potential to impact buildings and structures that may qualify as historical resources. Not all historical resources are considered fragile buildings and significant impacts to historical resources from vibration are rare.
- Although archaeological and tribal resources may be considered historical resources, impacts to these types of resources are addressed in Chapter 4.XX, **Cultural Resources—Archaeological Resources** and Chapter 4.XX, **Tribal Cultural Resources**.

## 2. Appendix G Thresholds of Significance

The City has adopted the State CEQA Guidelines Appendix G Environmental Checklist questions as thresholds to determine the significance of a project's impacts. As such, in accordance with the State CEQA Guidelines Appendix G, a project would have a significant impact related to historical resources if it would:

***Threshold (a): Cause a substantial adverse change in the significance of a historical resource defined in Section 15064.5.***

## 3. Screening Criteria

The following screening criteria may be used to determine whether evaluation of this issue in a CEQA document is necessary. After reviewing the project plans and project description, if the response to the question below is “yes,” further analysis is likely required. If the response is “no,” normally there would be no potential for a significant impact on a historical resource from the proposed project and further analysis is not required.

### Historical Resources

- Are there historical resources on the project site or in the immediate vicinity that meet the definition of a historical resource in under CEQA at Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a), that would be

adversely impacted through demolition, construction, rehabilitation, relocation, or alteration?

- **How to Determine:** Review online databases and lists in **Section 8, Additional Sources** to identify historical resources on the project site or in the immediate vicinity. In most cases, the immediate vicinity should be defined as the City block on which the project site is located. The three categories below provide direction in making this determination based upon the definition of a historical resource in Public Resources Code Section 21084.1 or Section 15064.5 of the State CEQA Guidelines: Category 1 historical resources are mandatory; Category 2 historical resources are presumptive; and Category 3 historical resources are discretionary. Each category of historical resources is defined below:
  - Category 1—Mandatory historical resources are properties listed in the National Register, listed or determined to be eligible for listing in the California Register by the State Historical Resource Commission, designated State Landmarks from No. 770 onward, and California Points of Historical Interest that have been evaluated by the SOHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register. A property listed on the California Register of Historical Resources or found eligible by the State Historical Resources Commission does not require evaluation in a technical study; it must be treated as a historical resource.
  - Category 2—Presumptive historical resources are properties designated as Historic-Cultural Monuments (HCMs) and areas designated as Historic Preservation Overlay Zones (HPOZs). Only a preponderance of evidence demonstrating that the HCM or HPOZ are not historically, architecturally, or culturally significant will preclude the property or area from being treated as a historical resource. Evidence may include the property or area no longer meet the criteria for designation as an HCM or HPOZ because the qualities that caused the designation have been destroyed subsequent to the designation. Such would rarely be the case, as alterations to listed historical resources are reviewed by OHR.
    - Presumptive historical resources also include properties identified as significant in a historic resource survey meeting the criteria in Public Resource Code Section 5024.1 (g). These criteria pertain to the requirements for the nomination of historic resource surveys for listing in the California Register.<sup>4</sup> There are no historic resource surveys in Los Angeles that meet these criteria.

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<sup>4</sup> A resource identified as significant in a historical resource survey may be listed in the California Register if the survey meets all of the following criteria:

(footnote continued on next page)

- Properties identified as “historic” in a Specific Plan could be considered presumptive historical resources. Each Specific Plan has varying degrees of information regarding historical resources. A Historical Resource Assessment Report (see Section 5, Technical Studies to Support the Analysis, below) may be required to determine if the previous evaluation of eligibility is still valid.
- Category 3—The City, as the lead agency, has the discretion to treat properties evaluated as appearing eligible for listing in federal, state, and local registers as historical resources for the purposes of CEQA. The determination must be supported by evidence in light of the whole record.<sup>5</sup> Properties identified as eligible by SurveyLA—or another historic resource survey conducted by a qualified professional and accepted as complete by the Director—should be considered evidence. The Planner should consult with OHR to determine if there is substantial evidence based on SurveyLA and their review of the record, including any applicant study, that the property is a discretionary historical resource.

Properties that are not mandatory (Category 1), presumptive (Category 2), or discretionary (Category 3) historical resources may be screened from further consideration. In determining whether or not to exempt a property from evaluation as a potential historical resource, consultation with the OHR may be warranted. Alternatively, the applicant may provide a Phase I Historic Assessment Memorandum (see Section 5, Technical Studies to Support the Analysis, below).

## 4. Methodology

The following describes the general methodology to be followed in order to provide a detailed analysis when further analysis is required to address the threshold listed above.

### Threshold (a)—Historical Resources

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources as follows:

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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 office procedures and requirements; and*
  3. *The properties were evaluated and determined by the office (SHOP) to have a significance rating of Category 1 to 5 on DPR Form 523.*

<sup>5</sup> 14 CCR Section 15064.5 (a)(3)(4).

*A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.<sup>6</sup>*

“Substantial adverse change” is defined as follows:

*Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.<sup>7</sup>*

A historical resource is “materially impaired” when a project:

*Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.<sup>8</sup>*

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

## 5. Technical Studies to Support the Analysis

Chapter 5.XX, Technical Studies—Historical Resources, provides detailed information about the contents and requirements for technical studies related to historical resources, as well as guidance on when such studies are required or appropriate. These technical studies should be prepared by professionals meeting the Secretary of the Interior’s Professional Qualifications Standards for the relevant field of study. The following summarizes the types of technical studies that may be needed to support a historical resource analysis.

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<sup>6</sup> 14 CCR Section 15064.5 (b).

<sup>7</sup> 14 CCR Section 15064.5 (b)(1).

<sup>8</sup> 14 CCR Section 15064.5 (b) (2) (c).



- **Phase I Historic Assessment Memorandum** - For properties that are not listed under federal, state, or local landmark or historic district programs or not previously identified as significant in a historic resource survey, a Phase I Historic Assessment Memorandum may be required before concluding a project site and/or its immediate vicinity do not contain any historical resources. A memorandum should confirm the properties comprising a project site do not meet the relevant eligibility standards set forth in the *LACHCS* due to lack of significance and/or integrity.
- **Historical Resource Assessment Report** - In most cases, a Historical Resource Assessment Report (HRAR) will not be required for properties in Categories 1 and 2. For properties in Category 3, a HRAR may be required to determine the character-defining features of the property or to determine if the previous evaluation of eligibility is still valid.
- **Secretary of the Interior’s Standards Memorandum** - A Secretary of the Interior’s Standards Compliance Memorandum (SOIS Memo) is applicable to projects involving alterations to properties listed under federal, state, or local landmark and/or historic district programs (Categories 1 and 2) or identified as significant in a historic resource survey or HRAR (Category 3).
- **Historical Resource Technical Report** - A Historical Resource Technical Report (HRTR) identifies historical resources on or in the immediate vicinity of a project site, analyzes the potential impact the project may have on the identified historical resources, and recommends mitigation measures, as warranted. A technical report may include the evaluation of properties as potential historical resources or may summarize the significance, integrity, and character-defining features of listed historical resources.

## 6. Project Design Features

In general, OHR should be consulted with regard to project design features related to project sites with historical resource(s). Such project design features may include the following:

- **Historic Structure Report** - Historic Structure Reports (HSRs) are appropriate project design features for projects involving architecturally significant historical resources, exceptionally significant historical resources, historical resources with multiple components, and complex rehabilitation efforts executed in phases. An HSR provides documentary, graphic, and physical information about a resource’s history and existing condition. Additionally, an HSR identifies character-defining features and makes recommendations for their treatment and maintenance in compliance with the Standards. HSRs should be prepared based upon NPS *Preservation Brief #43: The Preparation and Use of Historic Structure Reports* prior to the development of architecture and engineering drawings. HSRs prepared as project design features should be submitted to OHR for review and concurrence.

## a. Regulatory Measures to be Implemented as Part of the Project

The City has adopted several ordinances, codified in the Los Angeles Municipal Code (LAMC) and Los Angeles Administrative Code (LAAC), to preserve and protect historical resources. The following ordinances are applicable on a project basis and must be incorporated into the project's plans or operations:

- **Ordinance No. 185,472/LAAC Section 22.171 (Cultural Heritage Ordinance)** pertains to historical resources designated as HCMs. Projects involving HCMs may include compliance with the Ordinance as a project design feature. The findings required for the issuance of a permit by the Cultural Heritage Commission for the substantial alteration of an HCM are as follows:
  1. The substantial alteration, including additional buildings on a site containing multiple buildings with a unified use, complies with the Standards for Rehabilitation approved by the United States Secretary of the Interior;
  2. Whether the substantial alteration protects and preserves the historic and architectural qualities and the physical characteristics that make the site, building or structure a designated HCM; and
  3. Compliance with the CEQA, PRC Section 21000, *et seq.*

Thus, compliance with the Standards will be ensured by OHR (responsible for implementation of the Ordinance), which will review the construction documents prior to approving the building permits pursuant to the Ordinance. Therefore, a project in compliance with sections 1 and 2 of the Ordinance would not result in an adverse impact on a historical resource. OHR should be consulted with regard to additional measures such as the qualifications of the project team and construction monitoring.

- **Ordinance No. 188,903/LAMC 12.20.3 (Historic Preservation Overlay Zone Ordinance)** pertains to properties located within designated HPOZs. Projects located within an HPOZ may include compliance with the Ordinance as a project design feature. The Ordinance includes criteria for the issuance of Certificates of Appropriateness for Contributing Elements and Certificates of Compatibility for Non-Contributing Elements to protect the historic character and integrity of the HPOZ. All HPOZs have adopted Preservation Plans that elaborate on the regulations in the Ordinance. The Preservation Plans include the Standards by reference. Therefore, a project in compliance with the Ordinance would not result in an adverse impact on a historical resource.

## 7. Impact Analysis

The purpose of a CEQA analysis of historical resources is to determine whether a proposed project will affect any listed or eligible historical resources, either directly through demolition, relocation, alteration, etc. or indirectly by causing a substantial material change to the integrity of the resource or its immediate surroundings, based on the State CEQA Guidelines Appendix G thresholds of significance, detailed above. In accordance with the State CEQA Guidelines, all phases of a project shall be considered in the analysis of environmental impacts. The analysis can typically be limited to an examination of changes in the existing physical conditions in the project Impact Area. Both direct and indirect impacts, as well as short-term and long-term impacts, must be identified. Refer to State CEQA Guidelines Section 15126.2 for further guidance regarding relevant issues to consider in an impact analysis.

Direct or primary impacts are caused by a project and occur at the same time and place. With regard to historical resources, direct impacts include the demolition of historical resources as well as the relocation or alteration of historical resources that result in a loss of integrity.

Indirect or secondary impacts are caused by a project and occur at a different time and place. Examples of indirect impacts may include visual, auditory, and atmospheric changes to the immediate surroundings of a historical resource from construction. Thus, the historical resource impact analysis may overlap with the aesthetic and noise/vibration analysis (see Section 1.c, Related Topics Addressed in Other Sections of this CEQA Guide, above).

### a. Construction and Operational Impacts

To address the thresholds of significance, the analysis should consider the issues outlined below. The initial items listed below are applicable to all CEQA document types, while a more robust discussion will be needed for an EIR, as indicated below.

***Threshold (a): Change in the significance of a historical resource defined in Section 15064.5.***

- **Demolition** - The demolition or destruction of an individual historical resource will always constitute a significant impact. Mitigation measures may be recommended; however, the demolition of a historical resource cannot be mitigated to a less than significant level. Thus, an alternative that avoids and/or lessens the impact must be analyzed. As discussed below, the demolition of a contributing building within a historic district may or may not result in a significant impact.
- **Relocation** - The relocation of historical resources such as buildings, structures, and objects is generally discouraged but will not automatically result in a significant

impact. The potential for a direct impact will depend upon: (1) the reason the historical resource is significant; and (2) the compatibility of the new location. If the historical resource is significant for an association with an event or person, the original location and setting will likely be essential factors of integrity. Thus, the relocation may result in a significant impact because the historical resource would no longer be able to convey its significance. If the historical resource is significant for its design and construction, the original location and setting will not necessarily be essential factors of integrity. The historical resource could still be able to convey its significance so long as the new location is compatible with the original character and use. To avoid a significant impact, the relocated historical resource should retain its character-defining features, orientation, and general environment.<sup>9</sup> Mitigation measures or project design features will likely be required to reduce the impact to a less-than-significant level.

- **Alteration** - The alteration of historical resources such as buildings, structures, objects, and sites will not automatically result in a significant impact. Normally, a project will qualify for a Class 31 exemption if the alteration complies with the Standards. The Standards, however, are not the threshold for significant impacts on historical resources. A historical resource will be materially impaired if the project adversely alters the physical characteristics that convey its significance. Thus, the impact analysis should consider: (1) why the historical resource is significant; (2) the physical characteristics that convey the significance of the historical resource; (3) the current integrity of the historical resource; and (4) whether the proposed alterations would result in a substantial adverse change in the integrity of the historical resource. Mitigation measures or project design features will likely be required to reduce the impact to a less-than-significant level.
- **Construction** - New construction related to historical resources refers to free-standing buildings and structures. Additions to historic buildings should be analyzed as alterations. Construction, not involving an historical resource, but in the immediate vicinity would not normally alter the physical characteristics of a historical resource. The only impact to the historical resource would be a potential loss in integrity from a loss of integrity with respect to its to the setting of the historical resource. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property as well as the resource's broader surroundings. The potential for an impact from construction will depend upon: (1) the reason the historical resource is significant; (2) whether setting is an essential factor of integrity of the historical resource; (3) whether the integrity of setting is intact or disrupted from the period of significance; and (4) how and to what degree the setting will be diminished by the visibility of the project from the historical resource.

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<sup>9</sup> 14 CCR Section 4852 (d)(1).

- **Historic Districts** - If the historical resource is a historic district, the impacts analysis should consider whether the project's demolition, alteration, relocation, or construction activities will result in a substantial adverse change to the historic district as a whole. The demolition of a non-contributing building will rarely result in a significant impact, while the demolition of a contributing building may or may not result in a significant impact. The impacts analysis should consider how demolition will affect the integrity of the historic district. The analysis should take into account: (1) the current integrity of the historic district; (2) the concentration and distribution of contributing buildings; (3) the ratio of contributing to non-contributing buildings, and (4) the location of the contributing building proposed for demolition. A similar approach should be used in the analysis of impacts from the construction of a new building within the boundary of a historic district. The impacts analysis should consider: (1) the size, scale, and design of the new building; (2) the location of the new building within the historic district boundary; and (3) the ratio of contributing to non-contributing buildings upon the completion of the project. A historic district will not remain eligible as an historical resource if it contains so many alterations and intrusions that it is unable to convey its significance.

The result of the impact analysis should be a clear determination as to whether the project would result in a substantial adverse change in the significance of a historical resource(s); in other words, whether the project materially impairs the physical characteristics that convey the resource's historical significance and justify its eligibility for listing. An explicit conclusion should be made as to whether the construction-related and operational impacts, including direct and indirect impacts, would be less than significant or significant.

## b. Cumulative Impacts

Refer to [Section 3.XX, CEQA Document Preparation](#), for general guidance regarding the evaluation of cumulative impacts, including how to determine the appropriate geographic context for the analysis and how to define the list of related projects that should be considered in the cumulative impact analysis.

In most cases, the geographic context for the cumulative impact analysis of historical resources will be the same as the Impact Area for indirect impacts. If there are no related projects in or adjacent to the Impact Area, there is no potential for cumulative impacts on historical resources and no further analysis is required.

The development of related projects can affect historical resources if such projects adversely alter and/or demolish historical resources that may be interrelated, such as historical resources that are part of the same historic district. If a project is located within the boundary of a historic district, the analysis should identify past, present, and proposed projects within the boundary. The discussion may rely on the analysis and conclusions in the environmental review documents for the related projects, if available. The discussion need

not be as detailed as the analysis for the proposed project. A brief summary of the impacts, if any, from related projects is sufficient.

### c. Mitigation Measures

Mitigation measures must be fully enforceable through legally binding instruments. They must be performance based and state what needs to be done, who is responsible for doing it, and when it needs to be done. Mitigation measures should be commensurate with the historic property type, its historical, architectural, or cultural significance, and the action that will impact it. For projects involving impacts to a historical resource, more than one mitigation measure may be required. Appropriate mitigation measures for historical resources are discussed below. Mitigation measures such as documentation, commemoration, and interpretation should include some flexibility for consultation on the content with the lead agency and stakeholders but should not reduce the effectiveness or implementation. The application mitigation measures will not necessarily reduce the impact to a less than significant level.

- **Rehabilitation** - For projects involving the relocation or alteration of a historical resource where compliance with the Standards cannot be conclusively determined based upon conceptual or schematic design drawings, mitigation may include retaining a qualified professional to oversee the work. Professionals should meet the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in the rehabilitation of historic buildings. The professional should review the construction drawings for compliance with the Standards. If the drawings do not meet the Standards, the professional should make recommendations for bringing them into compliance. The professional should ensure the notes on the drawings include procedures for unforeseen discoveries during construction. The professional should prepare a technical memorandum with findings, recommendations, and conclusions, which should be submitted to OHR for review and concurrence. Building permits should not be issued until OHR has concurred the drawings comply with the Standards. Compliance with the Standards would reduce the impact to a less-than-significant level. Such mitigation is not required for historical resources subject to the HPOZ Ordinance. In most cases, the same would be true for historical resources subject to the Cultural Heritage Ordinance. Large and complex rehabilitation projects involving designated HCMs, may require such mitigation to ensure compliance with the Standards.
- **Relocation** - For projects involving the demolition of a historical resource, mitigation may include relocation on or off site. Relocation is appropriate mitigation when the historical resource is significant for its design or construction (i.e., when the location and setting are not essential to understanding the importance of the building, structure, or object). Relocation is not appropriate mitigation for certain types of historical resources, such as those in extremely poor condition or large in

scale where the end result would require reconstruction rather than rehabilitation. With conditions for approval pertaining to the suitability of the receiving site and treatment of the historical resource during and after the move, relocation could reduce the impact to a less-than-significant level. The relocation of a contributing building outside the boundary of its associated historic district would not reduce the impact to a less-than-significant level.

Mitigation may also include requiring the project applicant to make a historic building available for relocation to third parties. If this option is pursued, no later than 90 days before the commencement of construction of the project, the applicant should publicize the availability of the building by publishing notice in a newspaper of general circulation and by directly informing potentially interested parties. If relocation of the historical resource cannot be guaranteed when the CEQA document is certified, this measure would not reduce the impact to a less-than-significant level.

- **Commemoration** - For projects involving the demolition of a historical resource, mitigation may include commemoration. Commemoration is appropriate when the historical resource is significant for its association with an historic event or person and the location is inherently important to the understanding of the event or person's life. Commemoration may include on-site signage such as markers and plaques and/or public art such as murals and sculptures. The location of such objects should be thoughtfully integrated into the project and situated for maximum visibility. OHR should be consulted on the content and design of commemorative objects. Commemoration would not reduce the impact to a less-than-significant level, but would nonetheless memorialize the historic event or person's life.
- **Interpretation** - For projects involving the demolition of a historical resource, mitigation may include interpretation. Interpretation is appropriate when the historical resource is significant for its association with an historic event, series of events, person, or groups. Interpretation usually refers to off-site displays, printed materials such as historic context statements, multiple property documentation forms, websites, oral histories, lesson plans, videos, etc. Interpretive materials should be directly related to the significance of the historical resource that will be lost and meaningful to stakeholders. For culturally significant resources, stakeholder engagement should be required. Interpretation would not reduce the impact to a less-than-significant level but would nonetheless increase the public's awareness of the past.
- **Documentation** - For projects involving the adverse alteration or demolition of a historical resource, mitigation may include documentation. Documentation is particularly appropriate for historical resources that are significant for their design and construction. Documentation usually refers to large format photographs, a written report, and measured drawings based upon NPS guidelines. NPS manages three programs, including the Historic American Building Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscapes Survey (HALS). The documentation program will depend on the historic property

type impacted. The level of documentation should be commensurate with the significance of the historical resource and developed in consultation with OHR.

Making one copy of HABS, HAER, or HALS documentation as a donation to NPS is preferable to making multiple copies for local archives. NPS will review the documentation for consistency with their program guidelines, properly store the documentation, and make the documentation available to the public through the Library of Congress. Digital copies of the documentation can be offered to local archives.

The fieldwork for the documentation must be completed prior to any physical alterations of the historical resource. Proof of the submittal and receipt of the documentation by NPS must be submitted to OHR prior to the issuance of a Certificate of Occupancy.

- **Historic Structure Reports** - If a Historic Structure Report (HSR) is not a project design feature, it may be mitigation for projects involving the relocation or alteration of a historical resource. See Section 6, Project Design Features for a description of an HSR.

Mitigation measures to minimize impacts to historical resources caused by vibratory construction activities, including the use of vibration monitoring equipment and force adjustable ground compaction devices, are provided in **Chapter 4.XX, Noise and Vibration**.

## 8. Additional Resources

The following additional resources may be referenced in identifying historical resources on the project site or in the immediate vicinity:

- **BERD**—The Built Environment Resources Directory (BERD) is maintained by the State Office of Historic Preservation (SOHP) and includes properties listed and determined eligible for listing in the National Register, listed and determined eligible for listing in the California Register, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resource surveys and other planning activities reviewed by SOHP through federal and state environmental compliance laws. To determine if a property is listed under federal or state landmark and historic district programs visit [https://ohp.parks.ca.gov/?page\\_id=30338](https://ohp.parks.ca.gov/?page_id=30338). Click on the Los Angeles County file to download a searchable spreadsheet. In using this data, the following should be noted:
  - Properties in places like Watts, San Pedro, Hollywood, etc. may be entered under those names rather than Los Angeles.



- Properties may be entered more than once. The most recent entry will be the most relevant in determining if the property is a listed historical resource.
- Properties previously surveyed in the 1970s, 1980s, 1990s, and 2000s may have been resurveyed by SurveyLA. If not, they may require reexamination before concluding they are historical resources as defined by CEQA.
- **ZIMAS** - The Zone Information and Map Access System (ZIMAS) is maintained by the Department of City Planning. A property may be searched by address, street intersection, Assessor Parcel Number, PIN Number, or legal description; see the ZIMAS User Guide for basic instructions. Designated historical resources can be identified through ZIMAS under the “Planning and Zoning” tab on the left side of the webpage. Under the Historic Preservation Review tab, a red “yes” or a black “no” will display. By clicking on the “yes,” you may continue in ZIMAS or reroute to HistoricPlacesLA. Historic resource survey findings, including SurveyLA, will not result in a “yes” in ZIMAS. By continuing in ZIMAS, the Historic Preservation window will pop-up. There are three information tabs: Historic Preservation Overlay Zone, Other Historic Designations, and Mills Act. Click on the PDF icon for a report that contains all of the historic preservation information pertaining to the parcel. The Historic Preservation Overlay Zone tab will provide the name of the HPOZ and indicate whether the property is a contributing or non-contributing feature. The Other Historic Designations tab will indicate federal, state, and local designations. The information regarding federal and state designations should be the same information found in the BERD, but with more detail regarding the date designations were made and surveys were conducted. The Mills Act tab will indicate whether the property has a Mill Act Contract, although it is not relevant for CEQA purposes.
- **SurveyLA** - SurveyLA was a comprehensive program that identified historical resources throughout the City of Los Angeles (from the time period 1850-1980). Field surveys conducted from 2010 through 2017 covered the entire City of Los Angeles—over 880,000 legal parcels in an area of almost 500 square miles. The surveys and resource evaluations were completed by consultant teams meeting professional qualification standards in historic preservation under the supervision of OHR. Evaluations were based upon research standardized criteria for listing under federal, state, and local landmark and historic district programs. This information can be found in SurveyLA reports, available at <https://planning.lacity.org/preservation-design/historic-resources-survey>. Report data is organized by Community Plan Area (CPA), so clicking on the applicable CPA in the interactive map will provide PDF documents of the survey report and consolidated data tables. In using this data, the following should be noted:
  - SurveyLA was conducted from the public right-of-way, thus properties not visible to field teams may not have been surveyed.
  - Properties listed under federal, state, and local landmark and historic district programs were not re-evaluated by SurveyLA.

- Surveys completed by the Community Redevelopment Agency (CRA) after 2005 and concurrent with SurveyLA were not resurveyed through SurveyLA. See CRA Surveys below for more information.
- **HistoricPlacesLA** - SurveyLA data is also inventoried in HistoricPlacesLA, the City’s online information and management system of historical resources. HistoricPlacesLA also includes properties designated as HCMs and properties located within HPOZs. To determine if a property has been identified by SurveyLA, visit <http://historicplacesla.org/>. Search by address by clicking “Map View” in the navigation bar at the top of the webpage. An identified property will be indicated by a red pin. After clicking on the pin, click “View Report.”
- **CRA Surveys** - The following Redevelopment Plan Areas were not resurveyed by SurveyLA:
  - Adelante Eastside Redevelopment Area
  - Cornfield Arroyo Seco Specific Plan Area
  - Hollywood Redevelopment Project Area
  - Normandie 5 Redevelopment Area
  - Northeast Los Angeles River Revitalization Area
  - San Pedro Commercial Corridor Redevelopment Area
  - Westlake Recovery Area
  - Wilshire Center and Koreatown Recovery Redevelopment Area

If a proposed project is located in one of the eight CRA areas not resurveyed by SurveyLA, the project planner will need to determine if a property has been identified as eligible for designation by searching the applicable survey report. These can be found at <https://planning.lacity.org/preservation-design/historic-resources-survey> under Other Recent Historic Resource Surveys.

- **California Historical Resource Status Code** - All surveyed properties have an alphanumeric California Historical Resource Status Code. These status codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:
  1. Listed in the National Register or the California Register.

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

For the purposes of SurveyLA, additional status codes were developed in collaboration with SOHP:

- **QQQ** Properties requiring additional research to evaluate or that cannot be evaluated due to limited or no visibility.
- **6LQ** Not eligible: Area determined ineligible for district designation through SurveyLA; neighborhood or area may warrant special consideration for local planning.
- **6LS** Individual property identified through SurveyLA as ineligible for National Register, California Register or Historic-Cultural Monument designation; may warrant special consideration for local planning.
- **7RQ** Individual property identified in a SurveyLA Survey—Not evaluated.
- **7SQ** Not eligible; individual property assessed for significance in accordance with SurveyLA but does not meet eligibility standards.