

APPENDIX D

Cultural Resources

December 3, 2020

Lynn Kaufman
Impact Sciences
811 W. 7th St, Suite 200
Los Angeles, CA 90017

**Preliminary Historic Resources Review for Parking Lot near 5001 Wilshire Boulevard,
671 S. Highland Avenue, 688 S. Citrus Avenue in Hancock Park HPOZ,
Los Angeles, Los Angeles County, California (Wilshire Highland)**

Dear Ms. Kaufman,

This memo summarizes a preliminary Historic Resources Review for the project area (Wilshire Highland) proposed for new development on three parcels at 671 S. Highland Avenue (APN 5507-019-012), 688 S. Citrus Avenue (APN 5507-019-012), and 677 S. Highland Avenue/5001 Wilshire Boulevard (5507-019-029). Specifically addressed is one of the parcels, 671 W. Highland Avenue, which is within the Hancock Park Historic Preservation Overland Zone (HPOZ) in Los Angeles, Los Angeles County, California. ASM Affiliates (ASM) understands that you are seeking this review prior to any request from the City of Los Angeles's Planning Department/Office of Historic Resources (OHR) and prior to the preparation of a cultural resources technical report in compliance with the California Environmental Quality Act (CEQA). After completing our review of the *Hancock Park Preservation Plan* (November 8, 2007; available at <https://planning.lacity.org/preservation-design/overlays/hancock-park>), City and County property information and historical designations, and consultation with OHR and HPOZ staff, ASM prepared this memo to clarify and outline the process that to be followed and the design guidelines the project would have to follow for City approval. The memo has been prepared by an ASM Architectural Historian who meets the Secretary of the Interior's *Professional Qualification Standards*.

Research and Background Information

On November 24, 2020, ASM conferred with Suki Gershenhorn (suki.gershenhorn@lacity.org), the planning staff contact for the Hancock Park HPOZ, who provided information regarding the parcel and the approval process for the proposed development of 671 S. Highland Avenue, specifically as it relates to the Hancock Park HPOZ. ASM has visited the site and confirmed that, even though 671 S. Highland is indicated on the Hancock Park HPOZ survey map as a Contributor, the parcel is now vacant, and it contains no historically significant landscaping, buildings, or structures (Figure 1). As your previous research has determined, the parcel at 671 S. Highland is likely exempt from planning review.

According to Ms. Gershenhorn, the parcel at 671 S. Highland Avenue is considered neither a Contributor nor a Non-Contributor to the HPOZ. This happens when the original property has been demolished (as occurred in 1987) and no resources, including landscaping, remain on the parcel. (Note that there is a tree in the parkway that needs to be retained [Figure 2].) Such parcels are not removed from the HPOZ or re-designated as Contributors or Non-Contributors, and action beyond HPOZ review is not needed for the proposed development of a green belt open space, although it might be requested in the future for any more extensive subsequent development. The *Hancock Park Preservation Plan* describes properties that are exempt from HPOZ review in the Hancock Park HPOZ but does not address vacant parcels such as 671 S. Highland Avenue, a previously contributing parcel with no historical significance. It also does not present guidelines specifically for infill that is limited to landscaping. However, the Secretary of the Interior's *Standards for the Treatment of Historic Properties (Standards)* state that new construction "must be

compatible with the massing, size, scale, and design.”¹ Absent any more specific guidelines, this can be extrapolated to assume that landscaping within a historic neighborhood should follow the same standards.

Review of Preliminary Project Plans

Regarding the HPOZ, 671 S. Highland Avenue is not a historical resource, and the proposed project would have no significant adverse impact to any CEQA historical resource; therefore, mitigation is not required.

ASM has reviewed the preliminary project plans (2020-1110 TOC Pre-App 11x17 FINAL DRAFT1, 5001 Wilshire, Pacific Springs, LLC). Your proposal for 671 S. Highland to continue the green belt that currently occupies the four parcels west of S. Citrus Avenue, extending to S. Orange Drive, is a reasonable one and would surely be welcomed by the HPOZ and the adjacent occupants.

Although the preliminary plans do not show details of the green belt design, ASM recommends that the design be consistent with the existing green belt parcels to the west of the project area. The use of similar features such as the meandering walkways, sparse use of street furniture, abundant vegetation including mature trees, and unobtrusive walls between the parcel and the residences to the north would ensure compatibility with the neighborhood (Figure 3). Any more obtrusive buildings and structures such as gazebos or playgrounds would be more likely to trigger more intensive review.

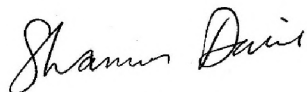
Next Steps: OHR Review

The HPOZ Referral Form is not necessary for this project, as it is used only for projects that require discretion. Ms. Gershenhorn requested a copy of the preliminary project plans, which she will review to make a determination regarding conformance of the Project. She should be able to confirm in writing whether further planning review is required, as you requested. HPOZ staff might request more detailed plans for the parcel within the HPOZ boundaries before making a determination of conformance. You might also consider providing a sketch showing how the proposed project ties in with the existing green belt.

Other than 671 S. Highland Avenue, the adjacent parcels within the proposed project but outside the HPOZ boundaries do not require review by HPOZ staff.

Consideration should also be given to the proposed vacation of Carling Way, which would require a call to the Bureau of Engineering/Street Services (<https://streetsla.lacity.org/>), the department in charge of right-of-ways. The Bureau might suggest contacting the Transportation Department, according to Ms. Gershenhorn. The development of the parcels at 677 S. Highland Avenue/5001 Wilshire Boulevard and 688 S. Citrus Avenue might be addressed in the Wilshire Specific Plan Overlay, which Ms. Gershenhorn has offered to provide.

Sincerely,



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¹ Grimmer, Anne E. (1995). *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstruction Historic Buildings*. Washington, DC: U.S. Department of the Interior, p. 26.



Figure 1. The vacant parcel at 671 S. Highland, view toward the northwest.



Figure 2. View toward the west from across S. Highland looking at 671 S. Highland, showing mature tree in parkway to be retained.



Figure 3. View of the east end of the existing green belt from S. Citrus Avenue toward the west.

NATIVE AMERICAN HERITAGE COMMISSION

April 20, 2021

Lynn Kaufman
Impact Sciences, Inc.Via Email to: yhussain@impactsociences.com**Re: Wilshire/Highland Mixed-Use Project, Los Angeles County**

Dear Ms. Kaufman:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green
Cultural Resources Analyst

Attachment

CHAIRPERSON
Laura Miranda
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Reginald Pagaling
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Merrí Lopez-Keifer
LuiseñoPARLIAMENTARIAN
Russell Attebery
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ApacheCOMMISSIONER
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**Native American Heritage Commission
Native American Contact List
Los Angeles County
4/20/2021**

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**Gabrieleno/Tongva San Gabriel
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**Santa Rosa Band of Cahuilla
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This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Wilshire/Highland Mixed-Use Project, Los Angeles County.