

5. Environmental Analysis

5.5 CULTURAL RESOURCES

This section of the program EIR evaluates the potential for implementation of the SUP to impact cultural resources in the District. This section discusses plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards), along with the existing cultural resource conditions throughout the SUP area, and possible environmental impacts that may occur during future phases of the SUP and site-specific projects implemented under the SUP.

TERMINOLOGY

Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, or architectural activities, or paleontological resources. Such resources provide information on scientific progress, environmental adaptations, group ideology, or human advancements

Architectural Resources include buildings, structures, objects, and sites of the built environment.

Historical Resources are buildings, structures, objects, sites, and districts that have been formally evaluated and found to meet one or more of the significance criteria identified in CEQA Section 15064.5 (a)(3). While most Historical Resources will be fifty years old or older, resources that have achieved significance in less than fifty years may also be considered historic, provided that a sufficient time has passed to understand their historical importance.¹

A **Historic District** is a concentration of historic buildings, structures, objects, or sites within precise boundaries that share a common historical, cultural, or architectural background, and meet one of the criteria for significance set forth in CCR Title 14, Chapter 11.5, Section 4852(b).

Historic Context is “those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) is made clear.” A context may be organized by theme, geographic area, or chronology; regardless of the frame of reference, a historic context is associated with a defined area and an identified period of significance. Historic contexts are linked to physical artifacts through the concept of *property types*

Property Types are “a grouping of individual properties characterized by common physical and/or associative attributes.” A historic context, therefore, provides a framework for the evaluation of the significance of a potential historic resource.

Archaeological Resources are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological Resources include both structural ruins and buried resources. The term Unique Archaeological Resources is defined in Public Resources Code (PRC) Section 21083.2(g) as follows:

¹ 14 CCR, Chapter 11.5, Section 4852(d)(2)

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... ‘unique archaeological resources’ means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information need to answer important scientific research questions and there is a demonstrable public interest in that information;
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

A **Paleontological Resource** is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of non-fossil material dating to any period preceding human occupation.

5.5.1 Environmental Setting

5.5.1.1 REGULATORY FRAMEWORK

National, State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to cultural resources in the District. Site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standards are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

United States Code, Title 16, Sections 470 et seq.

The **National Historic Preservation Act of 1966** (16 U.S.C. 470 et seq.) authorized the National Register of Historic Places and coordinates public and private efforts to identify, evaluate, and protect the nation’s historic and archaeological resources.

Section 106 (Protection of Historic Properties) of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from State Historic Preservation Offices.

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United States Code, Title 16, Sections 470aa-mm

The **Archaeological Resources Protection Act** became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Indian lands.

United States Code, Title 25, Sections 3001 et seq.

The **Native American Graves Protection and Repatriation Act** (NAGPRA) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

Code of Federal Regulations, Title 36, Chapter I, Part 60

National Register Federal Program Regulations. Title 36–Parks, Forests, and Public Property, Chapter I–National Park Service, Department of the Interior, Part 60–National Register of Historic Places is authorized by National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470 et seq., and E.O. 11593.

The **National Register of Historic Places** (NRHP) is the nation’s official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state and national significance which have been documented and evaluated according to uniform standards and criteria.

The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service. Currently there are more than 76,000 listings that make up the NRHP, including all historic areas in the National Park System, over 2,300 National Historic Landmarks, and properties that have been listed because they are significant to the nation, a state, or a community.

Properties are nominated to the NRHP by the State Historic Preservation Officer (SHPO) of the State in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

Any individual or group may prepare a NRHP nomination. Thorough documentation of physical appearance and historic significance of the property is required. In California, completed nominations are submitted to the Office of Historic Preservation. After an application has been reviewed by Office of Historic Preservation staff, it is submitted to the State Historical Resources Commission (SHRC) to determine whether or not the property meets criteria for evaluation, and the SHRC makes a recommendation to the SHPO to approve or disapprove the designation. Nominations recommended by the SHRC and approved by the SHPO are forwarded for consideration to the Keeper of the National Register at the National Park Service in Washington, D.C.

During the time the proposed nomination is reviewed by the SHPO, property owners and local officials are notified of the intent to nominate. Local officials and property owners are given the opportunity to comment

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on the nomination, and owners of private property are given an opportunity to object to or concur with the nomination. If the owner of a private property or the majority of owners objects to the nomination, the SHPO may forward the nomination to National Park Service only for a determination of eligibility. Without formally listing the property in the NRHP, the National Park Service then determines whether the property is eligible for listing.

Properties may qualify for the NRHP when they meet any of four basic criteria:

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

A final critical component of eligibility is “integrity.” Integrity refers to the ability of a property to convey its significance and the degree to which the property retains the identity, including physical and visual attributes, for which it is significant under the four basic criteria. The NRHP criteria recognize seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

State

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

California Public Resources Code, Sections 5020–5029.5

This code continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the CRHR and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

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California Public Resources Code, Sections 5079–5079.65

This code defines the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.

California Public Resources Code, Sections 5097.9–5097.991

This code provides protection to Native American historical and cultural resources and sacred sites, and identifies the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

California Public Resources Code, Section 5024.1

The California Register of Historical Resources (CRHR) is the State version of the NRHP program. The CRHR was enacted in 1992 and became official January 1, 1993. The CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources (California Public Resources Code (PRC) Section 5024.1). The program may involve resources listed or eligible for listing in the California Register. These resources may include properties already under the ownership of the district, and properties considered and acquired for implementation of the SUP.

Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historic resource as a property that is listed on—or eligible for listing on—the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR. The criteria for both are similar and described below, with the NRHP letter (A, B, C, and D) followed by the corresponding CRHR number (1, 2, 3, and 4)

- **A/1:** For an association 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 (NRHP Criterion A; CRHR Criterion 1);
- **B/2:** For an association with the lives of persons important to local, California, or national history (NRHP Criterion B; CRHR Criterion 2);
- **C/3:** As an embodiment of the distinctive characteristics of a type, period, region, or method of construction, representative of the work of a master or high artistic values (NRHP Criterion C; CRHR Criterion 3); or
- **D/4:** Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (NRHP Criterion D; CRHR Criterion 4).

Resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be “recognizable as historic resources and to convey the reasons for their significance.” Under CRHR regulations, “it is possible that historical resources may not retain sufficient integrity to meet the criteria for

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listing in the NRHP, but they may still be eligible for listing in the California Register.”² OHP has consistently interpreted this to mean that a California Register–eligible property must retain “substantial” integrity. Because CRHR regulations do not provide substantial written guidance on evaluating integrity, the NRHP bulletin, “How to Apply the National Register Criteria for Evaluation,” is used.

The CRHR also includes properties that: have been formally determined eligible for listing or are listed in the NRHP; are registered State Historical Landmark Number 770 and above; are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing; and are city- and county-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with CRHR criteria).

California Public Resources Code Sections 21000 et seq. and California Code of Regulations Title 14 Sections 15000 et seq.

The **California Environmental Quality Act** (CEQA) and the **CEQA Guidelines** have specific provisions relating to the evaluation of a project’s impact on historical and unique archaeological resources.

PRC Section 21084.1 and Section 15064.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA. First, a resource is considered a historical resource for purposes of CEQA if it is listed or “deemed eligible for listing” in the CRHR by the State Historical Resources Commission.³ Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1,⁴ or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC Section 5024.1.⁵ If a resource meets either of these criteria, the lead agency must treat the resource as historically significant unless the “preponderance of the evidence” indicates that the resource is not historically significant.

Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the California Register, listed in a local register, or identified in a local survey.⁶ Any such determination must be based on substantial evidence in light of the whole record.⁷

CEQA also provides further guidance with respect to historical resources of an archeological nature and unique archaeological resources. A unique archeological resource is defined in PRC Section 21083.2(g) as:

[A]n archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, (2) has a special and particular quality such as being the oldest of its type or

² 14 CCR Section 4852(c).

³ PRC Section 21084.1; 14 CCR Section 15064.5(a)(1).

⁴ PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

⁵ PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

⁶ PRC Sections 21084.1 and 15064.5(a)(3)(4).

⁷ 14 CCR Section 15064.5(a)(3).

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best available example of its type, and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the CEQA Guidelines Section 15064.5(b): “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.” This section of the guidelines defines historical resources as including both the built environment and archaeological resources.

A substantial adverse change is defined in the CEQA Guidelines Section 15064.5(4)(b)(1), as “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 significance of an historical resource is materially impaired, according to the CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or
- (C) 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.

The CEQA Guidelines provide that “generally” a project that follows the Secretary’s Standards “shall be considered as mitigated to a level of less than a significant impact on the historical resource.”⁸

At the same time, however, a failure to precisely conform to the Secretary’s Standards in all respects does not necessarily mean that a project necessarily has a significant adverse impact on historical resources. There are circumstances where a project impacting historical resources may fail to conform to the Secretary’s Standards, and yet the lead agency can conclude based on substantial evidence that the overall impact is insignificant because the project does not “materially impair” the historical resource within the meaning of Section 15064.5(b).

CEQA Guidelines Section 15064.5 subsection (c) addresses impacts on archaeological sites. That section provides as follows:

⁸ 14 CCR Sections 15064.5(b)(3) and 15126.4(b).

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- (1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- (2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- (3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

For historical resources of an archaeological nature, “preservation in place is the preferred manner of mitigating impacts to archaeological sites.”⁹ “When recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.” In practice, the OHP has consistently determined that excavation, coupled with implementation of a data recovery plan, does not result in a significant environmental impact on a historical resource of an archaeological nature.

A project that would cause “damage to a unique archaeological resource, may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state.” “To the extent that unique archaeological resources are not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision.”¹⁰ CEQA Guidelines Section 15064.5(f) provides that “a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction.”

CEQA Guidelines Section 15064.5(d) specifies a process for evaluating human remains, and this issue is identified on the CEQA Checklist as an issue for evaluation in environmental documents. In addition, the CEQA Checklist identifies the presence of paleontological resources as an environmental concern that needs to be considered. Therefore, the issues of human remains and paleontological resources are included in the significance criteria and the evaluation of impacts at the program level.

⁹ 14 CCR Section 15126.4(b)(3)(A).

¹⁰ PRC Section 210783.2(b) and (c).

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Local

City of Los Angeles Cultural Heritage Department

The City of Los Angeles Cultural Heritage Department is authorized under Administrative Code Title 22 Chapter 7 (Sections 22.101 et seq.), and the City Cultural Heritage Commission is authorized under Administrative Code Title 22 Chapter 9 Article 1 (Sections 22.171 et seq.).

In the City of Los Angeles, properties may be designated Historic-Cultural Monuments and/or may be included in Historic Preservation Overlay Zones. The Historic-Cultural Monument designation is reserved for individual historically significant properties. Historic Preservation Overlay Zones apply to areas of historical or cultural significance.

Los Angeles Historic-Cultural Monuments

In the City of Los Angeles, an HCM is defined in Cultural Heritage Ordinance Section 22.130 as "...any site (including significant trees or other plant life located thereon), building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites in which broad cultural, political, economic, or social history of the nation, State, or community is reflected or exemplified or which are identified with historic personages or with important events within the main currents of national, State or 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 age." Listing of a site as an HCM is subject to review by the Cultural Heritage Commission and the Arts, Health, and Humanities Committee of the city council, and requires approval by the city council. The city currently has over 1,000 historic-cultural monuments, providing official recognition and protection for Los Angeles' most significant and cherished historic resources.¹¹

Historic Preservation Overlay Zone

The Historic Preservation Overlay Zone (HPOZ) Ordinance was adopted by the City of Los Angeles in 1979 and revised in 1997. As defined in the Cultural Heritage Masterplan Review Draft (March 7, 2000), an HPOZ is "...a planning tool which recognizes the special qualities of areas of historic, cultural, or architectural significance. An HPOZ does not change the underlying zoning, rather it lays an added level of protection over a zone through local board oversight." There are 29 designated historic preservation overlay zones in Los Angeles. The Cultural Heritage Masterplan identifies the criteria for evaluating HPOZ applications. Under those criteria, "structures, natural features, or sites within the involved area, or the area as a whole, shall meet one or more of the following:

- "Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time.

¹¹ City of Los Angeles Office of Historic Resources. 2014, March 11. Historic-Cultural Monuments and the Cultural Heritage Commission. <http://www.preservation.lacity.org/commission>.

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- “Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or City.”
- “Retaining the structure would help preserve and protect an historic place or area of historic interest in the City.”

Because HPOZs have “special character or special historical, cultural, architectural, archeological, community or aesthetic value,” they are “presumed to be historically or culturally significant” and are therefore considered eligible for listing in the California Register.

Other Cities

Of the cities either entirely or partially within the district’s boundaries, only the City of Los Angeles has a historic preservation element in its general plan. However, the following cities do have historic preservation ordinances or regulations governing historic properties: Bell Gardens, Carson, El Segundo, Gardena, Huntington Park, Long Beach, Montebello, Monterey Park, Rancho Palos Verdes, San Fernando, Santa Monica, South Gate, Torrance, and West Hollywood.

Los Angeles County

County of Los Angeles historic preservation policies include local designation processes, commissions, or boards established to review historic properties, and zoning or other variances or special provisions for historic properties. Los Angeles County programs for protections for historic properties include the county Mills Act Program, which provides incentives for owners of qualified historical properties within the unincorporated areas of the county to preserve, restore, and rehabilitate the historic character of such properties. The county Landmarks and Records Commission recommends to the county board of supervisors local historical landmarks defined to be worthy of registration by the State of California Department of Parks and Recreation, either as “California Historical Landmarks” or as “Points of Historical Interest,” and may consider and comment for the board on applications relating to the NRHP. The Mills Act Program is authorized under Los Angeles County Code of Ordinances Sections 22.52.2700 et seq., and the Landmarks and Records Commission is authorized under Sections 3.30.010 et seq.¹²

LAUSD

This table lists the cultural resource related standard conditions and project design features (PDF) that are included as part of each SUP-related project, as appropriate.

¹² <https://library.municode.com/index.aspx?clientId=16274>.

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
Standard Condition				
CUL-00 Compliance	Cultural Resource Assessment Procedures	If a project may affect historic resources.	Prior to project approval	OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy. This document establishes assessment methodology and procedures for the identification and analysis of historical resources, unique archaeological resources, and paleontological resources pursuant to the CEQA.
Project Design Features				
CUL-1	Architectural Character	If a project may affect historic buildings or structures.	During project design	LAUSD shall re-use rather than destroy historical resources, where feasible. LAUSD shall take the following steps when dealing with historical resources: <ul style="list-style-type: none"> • Retain and preserve the historic character of a building, structure, or site, where feasible. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity, where feasible. • Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems, wherever feasible. • Undertake surface cleaning of historic structures with the gentlest means possible. Avoid sandblasting and chemical treatments
CUL-2	Historical Resource Assessment	If a Cultural Resource Assessment identifies historic resources on a proposed project site	During project design and prior start of CEQA document	LAUSD shall engage a design team, consisting of an architect and structural engineer, as necessary, with five (5) years' experience applying the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Design Team, in consultation with the Master Reviewer, shall consider whether and to what extent the proposed project could have a significant impact on the site's historical resources. If the Design Team determines that the proposed project could have a significant impact on the site's historical resources, and the Master Reviewer concurs with that determination, the Design Team shall develop and consider mitigation measures and alternatives that could minimize, avoid or substantially reduce the impacts.
CUL-3	Historical Resource Assessment	For projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource, or construction in the immediate surroundings of an historical resource.	During project design and prior start of CEQA document	LAUSD shall develop at least one alternative that either (1) complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties, or (2) otherwise avoids material impairment of the historical resource. LAUSD need not adopt any such alternative unless the LAUSD Board of Education determines that the alternative is feasible within the meaning of PRC Section 21061.1 and necessary to avoid a significant impact on historical resources.
CUL-4	Historical Resource Preservation	For projects involving the relocation, conversion, rehabilitation or alteration of an historical resource, or	During design development phase, and implementation of mitigation measures.	LAUSD shall retain a preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture (preservation architect) to review and comment upon project plans through the design development phase for conformance with the adopted mitigation measure or alternative.

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
		construction in the immediate surroundings of an historical resource, and if compliance with the Secretary's Standards or avoidance of a material impairment of the historical resources is adopted as a site-specific project mitigation measure or alternative.		
CUL-5	Historical Resource Preservation	For projects that may impact an historical resource	During pre-construction and construction monitoring activities	The preservation architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.
CUL-6	Historical Resource Documentation	If a project or any project alternative includes the demolition or damage to any recognized historic resources or any contributors to a historic district.	Prior to demolition or alteration	<p>LAUSD shall retain a professional architectural photographer and an architectural historian that meets the Secretary of the Interior's Professional Qualifications Standards (Architectural Historian) to implement Historic American Building Survey (HABS) Level II documentation or closely following the HABS Level II outline format. Documentation shall include drawings, photographs, and written data for each building/structure/element. For all levels of documentation, the following quality standards shall be met:</p> <p>Large format photographs: Photographic documentation shall include of the current status of all recognized historic resources or any contributors to a historic district and the existing surrounding setting. Large format photographs shall clearly depict the appearance of the property and areas of significance of the recorded building, site, structure, or object. Each view shall be perspective corrected and fully captioned. All shall be archivally processed and prints shall be made on fiber-based paper. Two original negatives (large format 4-inch by 5-inch black and white negatives) shall be made at the time the photographs are taken, two sets of contact prints, and three sets of 8-inch by 10-inch prints shall be processed.</p> <ul style="list-style-type: none"> • one set of negatives and one set of contact prints shall be archived at the National Park Service for entry into the HABS collection in the Library of Congress • one set of negatives and one set prints shall be archived at Los Angeles Public Library at the Central Library. • one set of prints shall be archived at the Los Angeles City Historical Society. • one set of prints shall be archived at LAUSD. <p>Narrative description: 1) Written history and description shall be based on primary sources to the greatest extent</p>

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				<p>possible. A frank assessment of the reliability and limitations of sources shall be included. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying name of researcher, date of research, sources searched, and limitations of the project; 2) the architectural historian shall prepare a narrative description (closely following the Historic American Buildings Survey Level II outline format) of historical architectural resources, including Department of Parks and Recreation (DPR) series forms.</p> <p>Document Submittal: The draft documentation shall be assembled by the architectural historian and submitted to the LAUSD Architectural Master Reviewer for review and comment. Architectural Master Reviewer shall give final approval prior and receive final documentation prior to submittal to the repositories and prior to work on the project. LAUSD shall submit the LAUSD-approved final documentation to the Los Angeles Public Library at the Central Library and the South Central Coastal Information Center.</p>
CUL-7	Historical Resource Notification	For projects where LAUSD has identified historical resources on the site.	As part of the public review process	LAUSD shall provide OHP copies of all negative declarations and environmental impact reports.
CUL-8	Historical Resource Reuse	If a project or any project alternative includes the demolition of any of the recognized historic structures	Prior to demolition or alteration	LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (i.e., the school bell, chalkboards, lockers, etc.) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.
CUL-9	Historical Resource Reuse	If a project or any project alternative includes the demolition of any of the recognized historic structures	Prior to demolition or alteration	LAUSD, consistent with Education Code Section 17545, shall offer for sale any remaining functional and defining features and building materials from the buildings. These materials could include doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others. They shall be made available to the public for sale and reuse, if features are not retained by LAUSD for reuse or display.
CUL-10	Archaeological Resource	If the project area is deemed highly sensitive for archaeological resources.	Prior to and during grading, excavation, or other ground-disturbing activities	LAUSD shall retain a qualified archaeologist to be available on-call. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39).
CUL-11	Historic and Archaeological Resource	If historical or unique archaeological resources are discovered during construction activities.	During grading, excavation, or other ground-disturbing activities	The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.
CUL-12	Archaeological Resource Monitoring Program	When a Phase I Archaeological Site Investigation shows a strong possibility that unique resources, and/or unique architectural resources have been identified on a site.	Prior to the start of construction	LAUSD shall implement an archaeological monitoring program for construction activities at a site prepared by a qualified archaeologist under the following conditions: (1) when a Phase I Site Investigation shows a strong possibility that unique archeological resources are buried on the site; and/or (2) when unique architectural resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery/Mitigation Program because the resources can be recovered through the archaeological monitoring program.
CUL-13	Archaeological Resource	If any evidence of prehistoric or historic cultural resources is uncovered.	During grading, excavation, or other ground-disturbing activities	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist. The qualified archaeologist shall assess the find(s) and, if it is determined to be of value, shall draft a monitoring program and oversee the remainder of the grading program. Should evidence of prehistoric or historic cultural resources be found the archaeologist shall monitor all ground-disturbing activities related to the proposed project. Any significant archaeological resources found shall be preserved as determined necessary by the archaeologist and offered to a local museum or repository willing to accept the resource. Any resulting reports shall also be forwarded to the South Central Coastal Information Center at the California State University, Fullerton.
CUL-14	Archaeological Resource	If project construction requires archaeological monitoring	Prior to the start grading, excavation, or other ground-disturbing activities	Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.
CUL-15	Archaeological Resource	When unique archaeological resources are discovered and LAUSD determines not to avoid them by abandoning the site or redesigning the project	During grading, excavation, or other ground-disturbing activities	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
CUL-16	Native American Resource	If evidence of Native American resources is uncovered	During grading, excavation, or other ground-disturbing activities	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.
CUL-17	Paleontological Resource	If the Cultural Resources Assessment identifies a project area as sensitive for paleontological resources.	During grading, excavation, or other ground-disturbing activities	LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.
CUL-18	Paleontological Resource	If the project area is deemed highly sensitive for paleontological resources.	During grading, excavation, or other ground-disturbing activities	The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.

5.5.1.2 EXISTING CONDITIONS

Natural Setting

California has been divided into 11 geomorphic provinces, that is, regions defined by characteristic landforms. The District spans parts of two geomorphic provinces: the Transverse Ranges Geomorphic Province, an east-west-trending series of steep mountain ranges and valleys; and the Peninsular Ranges Geomorphic Province, a series of northwest-trending mountain ranges and valleys. The boundary between the two geomorphic provinces within the District is the southern base of the Santa Monica Mountains and the Hollywood Hills.

Nearly all the southern half of the District is in the Los Angeles Basin; the southwest corner of the District is in the Palos Verdes Hills. Major landforms in the north half of the District are, from north to south: San Gabriel Mountains, Santa Susana Mountains, San Fernando Valley, Verdugo Mountains, Simi Hills, San Rafael Hills, Repetto Hills, Santa Monica Mountains, Hollywood Hills, and Los Angeles Basin. The San Rafael Hills, Repetto Hills, and part of the Los Angeles Basin are in the East Educational Service Center (ESC); the remainder of the landforms are in the North ESC. Landforms in the District are described further in Section 5.6, *Geology and Soils*, of this DEIR.

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Much of the District is urbanized. The California Resources Agency has divided California into 10 bioregions, that is, ecologically and geographically defined areas. Bioregions are defined based on geology, landforms, soils, climate, vegetation, land use, and wildlife. The District is in the South Coast Bioregion, which extends from the southern half of Ventura County to the Mexican border and east to the edge of the Mojave desert. The climate of most of the South Coast Bioregion is mild year-round with warm dry summers and wet winters. Habitat varies widely, from chaparral, juniper-pinyon woodland, and grasslands at lower elevations to mixed hardwood forest, southern oak, southern Jeffrey pine, and southern yellow pine at higher levels.¹³ Much of the South Coast Bioregion is urbanized.

Vegetation types in the part of the District in the San Gabriel Mountains include mixed chaparral, montane hardwood, chamise-redshank chaparral, and coastal scrub.¹⁴ Vegetation types in the Santa Monica Mountains near Topanga Elementary Charter School include coastal oak woodland and annual grassland.¹⁵ The aforementioned vegetation types are described in Section 5.4, *Biological Resources*, of this DEIR.

Unique Geological Features

La Brea Tar Pits

The La Brea Tar Pits are one of the best-known localities for ice-age fossils in the world. The La Brea Tar Pits are in and near the 23-acre Hancock Park in the City of Los Angeles, which includes an art museum and the Page Museum (tar pit-related displays and activities). The tar pits have provided an abundance of animal and plant fossils. Most are from the Pleistocene epoch (Ice Age) and date as far back as 40,000 years. Finds include mammoths, saber-tooth cats, insects, and birds.¹⁶

Cultural Setting

Prehistoric Archaeological Setting

The ancestors of the Gabrielino-Tongva Tribe occupied the entire Los Angeles Basin and were hunters and gatherers. Small encampments to large village sites have been identified throughout the area, some dating back over 5,000 years.

Historical Setting

The occupation of Los Angeles County by nonnatives began with the colonization of California, the expedition in 1769 to build a series of missions along the coast, and in 1781 when a group of 44 settlers founded the town of Our Lady the Queen of the Angels (El Pueblo de Nuestra Señora la Reina de Los Angeles de Prociuncula). This rich history has resulted in many significant archaeological and built-

¹³ California Resources Agency (CRA). 1998, December. South Coast Bioregion.

¹⁴ National Park Service (NPS). 2011, September. San Gabriel Watershed and Mountains: Special Resource Study and Environmental Assessment. <http://parkplanning.nps.gov/document.cfm?documentID=43639>.

¹⁵ California State Parks. 2012, September 28. Topanga State Park General Plan and Environmental Impact Report. Chapter Two: Existing Conditions and Issues. <http://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf>.

¹⁶ City of Los Angeles. 2001, September. Conservation Element of the City of Los Angeles General Plan. <http://planning.lacity.org/cwd/gnlpln/ConsvElt.pdf>.

5. Environmental Analysis CULTURAL RESOURCES

environment resources in the Los Angeles area. Table 3.5-1 provides a chronology of key events in history for the greater Los Angeles basin.

Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
5000 BC–1769	Ancestors of the Gabrielino-Tongva occupied all of Los Angeles County
Ca. 1500 A.D.	
1500	Thousands of Gabrielino-Tongvas reside in the area that will become Southern California. The Chumash live along the coast from Malibu north; the Gabrielino-Tongva live along the coast from Malibu south to El Toro and inland to the San Gabriel Mountains; and the Tafaviam reside in and around the San Fernando Valley.
1542	First European contact when Spanish explorer Juan Rodriguez Cabrillo lands on Catalina Island; followed in the 1700s by numerous expeditions and the beginnings of the Mission Period (1769).
1700 A.D.	
1765	King Carlos of Spain executes orders to colonize California so that Spanish claim over the region would not be lost.
1769	Spanish land expedition into California led by Gaspar de Portola to scout El Camino Real, the series of Franciscan missions to be built along coast. Two Spanish soldiers, Juan Jose Dominguez and Francisco Xavier Sepulveda, and Spain's first mission padre, Father Juan Crespi, were part of the group.
August 5, 1769	Portola crossed the Santa Monica Mountains and came upon a valley they named El Valle de Santa Catalina de Bononia los Encinos, part of what is now San Fernando Valley.
1771	Mission San Gabriel Archangel (San Gabriel Mission) was founded in 1771. Spaniards referred to the Tongva as Gabrielinos, whom they sought to Christianize.
September 4, 1781	El Pueblo de Nuestra Señora la Reina de Los Angeles de Prociuncula, or the town of Our Lady the Queen of the Angels of the Prociuncula, was founded by Los Pobladores, a group of 44 settlers, and established as an official pueblo by Spanish Governor Felip de Neve.
1783	Francisco Xavier Sepulveda retired from Spanish army and made his home in Los Angeles.
1784	Juan Jose Dominguez received the first Spanish land grant of 75,000 acres, the land south of El Pueblo de Los Angeles. Rancho San Pedro consisted of 75,000 acres. Sepulveda's grandson Jose received permission to raise cattle in the southern part of the rancho.
1797	San Fernando Rey de España Mission (Mission San Fernando) established within the boundaries of the modern-day Los Angeles.
1800 A.D.	
1809	Juan Jose Dominguez died and left Rancho San Pedro to Cristobal Dominguez, who later named his son Manuel Dominguez as executor.
1810	Beginning of Mexican War of Independence from Spain
1817	Ordered by Pablo Vicente de Salo, California's last Spanish governor, first primary school opened in Los Angeles.
1821	Spanish rule in California overthrown by Mexico.
1823	Mexican declaration of the Republic of Mexico.
1824	Jose Dolores Sepulveda was killed and ten years later, his heirs were awarded 32,000 acres of Rancho San Pedro, which they named Rancho de Los Palos Verdes.
1825	The Republic of Mexico claimed California as an official territory. During Mexican rule from 1825–1847, rancheros became wealthy from trade with labor provided by Native Americans.
1827	Under Mexican rule, a second school opened, admitting female pupils and teachers.
1831	Spanish Governor Manuel Victoria overthrown in "The Battle of Los Angeles." California divided into northern and southern provinces. Pio Pico became governor of southern province.
1835	Mexican Congress established Los Angeles a ciudad.

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Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
1836	Civil war broke out between northern and southern provinces of California.
1845	War ended with the battle at Cahuenga Pass. Spanish Governor Micheltorena was overthrown and replaced by Pio Pico, who was made governor of entire state.
1846	United States declared war on Mexico. Pio Pico sold almost the entire San Fernando Valley for \$14,000 to Eulogio de Celis.
1848	War ends with Treaty of Guadalupe Hildago, and California established an official U.S. territory.
April 4, 1850	Los Angeles incorporated as an American city, population 1,600.
1852	American public school system established in Los Angeles.
1854	Pio Pico's brother Andres acquired the southern portion of the Valley, which he then transferred back to Pico.
1856–57	Four schools open in Los Angeles County.
1850–1870	Los Angeles economy centered around agriculture of ranchos. As cash economy replaced Mexican barter economy, ranchos forced to mortgage land for money. By 1865, most ranchos transferred to American ownership. The Sepulvedas were forced to foreclose, losing their land to Anglo developers. A period of slow growth; school building in Los Angeles suffered due to lack of state resources, drought, and floods.
1858	Manuel Dominguez sold a portion of Rancho San Pedro to Phineas Banning, who founded Wilmington near San Pedro. The rest of Rancho San Pedro stayed in the Dominguez family until Manuel's daughter married Henry Carson, who assumed management of the rancho.
1860s	Construction of Los Angeles-San Pedro Railroad. Development of San Pedro Harbor increased trade and transportation, which allowed for creation of such communities as Compton and Carson.
1869	Southern Pacific Railroad completed transcontinental railroad to San Francisco. Pio Pico sold his share of the San Fernando Valley to investors led by Isaac B. Lankershim for \$2/acre. Lankershim acquired Valley's southern half and planted world's largest wheat-growing empire with partner Isaac Newton Van Nuys. Los Angeles Board of Education established.
1872	State legislature passed "Act to Enforce the Educational Rights of Children," making education compulsory.
1873	First high school opened in Los Angeles at Temple and Beaudry.
1874	Northern half of San Fernando Valley sold to Senator Charles MacLay and George K. Porter. MacLay founded Valley's first township, San Fernando.
1876	Southern Pacific Railroad reached Los Angeles, followed by the Santa Fe Railway, sparking the city's first real estate boom. By 1889 the boom was over, but Los Angeles had been put on the American map. First kindergarten opened.
1881	The Los Angeles State Normal School opened for the education of teachers, eventually becoming the University of California at Los Angeles.
1882	MacLay divided northern portion of San Fernando Valley with partners George and Benjamin Porter.
Late 1800s	Major progress made in establishment of Los Angeles infrastructure. Water supplies increased. Discovery of oil stimulated economy. General prosperity reflected by growth in school system, with 40 percent increase in enrollment. Los Angeles City School District established.
1889	Los Angeles High School built.
1890	Population grows to 50,395 and doubles to 102,479 by 1900.
1900 A.D.	
Early 1900s	Arrival of the automobile and Henry E. Huntington's Pacific Electric Railway Company, which linked Los Angeles communities by network of rail cars. Los Angeles became primarily a tourist town. Movie business established its roots.
1904	Leslie C. Brand, founder of the City of Glendale, purchased portion of George Porter's land and later helped construct the line of Pacific Electric railway from downtown Los Angeles via Van Nuys to San Fernando.

5. Environmental Analysis CULTURAL RESOURCES

Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
1909	<i>Los Angeles Times</i> executives Harrison Gray Otis and Harry Chandler paid \$53/acre for 47,500 acres of the Valley's southern half in what was most significant subdivision in history of the city. The City of Los Angeles annexed a shoestring strip of land extending south to San Pedro. The towns of Wilmington and San Pedro were both annexed, and the port became Port of Los Angeles.
1910	Newly formed City School District encompassed over 85 square mile with enrollment of 46,500.
1911	Manuel Dominguez's grandson John Manuel Carson sold 2,800 acres to the Torrance-Marshall Company.
1913	Water brought into Los Angeles from Owens Valley via William Mulholland's Los Angeles Aqueduct, the largest municipal water system in the country, luring surrounding communities into annexation.
1915	San Fernando Valley annexed by City of Los Angeles.
1916	Los Angeles School District covered 400 square miles, with enrollment of 78,658.
1920s	Economy boosted by oil, movies, and aerospace. Wave of immigration to the region between 1920 and 1940 described as largest internal migration in history of United States. Construction of Hoover Dam brought electricity to area. By 1920, 100,000 automobiles registered in Los Angeles and 150 new miles of road built. Los Angeles City Planning Commission approved 40 new subdivisions a week. Oil refineries built in San Pedro, Carson, Torrance, and El Segundo. Los Angeles School District experienced rapid growth, regularly annexing new schools every year or two. By 1925, enrollment exceeded available school capacity.
1929	Establishment of first community college, Los Angeles Junior College, by Los Angeles School District.
1930	Throughout Depression, migration into area continued. Los Angeles fifth largest city in U.S. with population 1.3 million attracting immigrants from both inside and outside the country. Los Angeles School District covered 1,039 square miles, three times the size of the City of Los Angeles. Enrollment reached 404,351. School facilities totaled 350.
1933	Long Beach earthquake. 40 school buildings demolished. Los Angeles School District implemented a phased school building reconstruction program. Field Act was passed to protect school buildings from future earthquakes, leading to state oversight of school building activities.
1935	Los Angeles School District enrolled 300,000 housed in 384 schools, serving an area of over 1,095 square miles. District contracted in next decade as cities such as Beverly Hills, Torrance and Culver City split off into individual districts. Enrollment, however, continued to increase.
1940	First freeway in western United States, Arroyo Seco Parkway (the Pasadena Freeway) opened, followed by San Gabriel and Hollywood Freeways later that decade.
1941–1945	World War II brings modern industrial phase of Los Angeles. Spurt of population growth and war-related industrial expansion. San Fernando Valley continues to be dominated by agriculture.
1950s	After the war, economic development continued, predominantly in aerospace and electronics. Established industries such as agriculture, petroleum, and fishing became less important. As growth continued, developers built new communities for expanding work force. Valley was rapidly becoming fastest growing area in the country as agriculture in the area was replaced by manufacturing. The southern area also experienced rapid growth, and as a result of growing work force, large areas of tract housing were quickly built. Developing suburbs were to align themselves with existing Los Angeles School District. School building construction, which had slowed during the war, exploded.
1960	Ethnically diverse population without a single majority grown to 2,479,015.
1970	Economy continued to diversify. With end of Cold War, decline in aerospace industry. Expansion of manufacturing, television and music recording, and service industries. Agriculture continued to give way to suburban subdivisions and retail centers. South area continued with development of industrial, office, recreational, and retail centers.
1984	Los Angeles displaced Chicago as America's second largest city.
1990s–2000s	Population growth continued with influx of immigrants from all over the world. Los Angeles still the second most populated city, rivaled only by New York, and spread out over the greatest municipal area in the country. LAUSD served more than 720,000 students in a 704-square-mile area.

Source: 2004 New School Construction Program EIR. Adopted June 2004.

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LAUSD 2004 Historic Resources Survey

Of the over 700 campuses and administrative complexes operated by the District in 2002, 410 contain permanent buildings which are at least 45 years or older. The LAUSD conducted an inventory of existing schools to determine the age and historical significance.¹⁷ The survey was performed in two phases. Phase 1 identified all LAUSD campuses and properties with buildings that were 45 years or older, in accordance with Office of Historic Preservation guidelines for local surveys. Previously completed documentation, including significance evaluations made by OHP in consensus with the Federal Emergency Management Agency following the 1994 Northridge Earthquake, was compiled and incorporated into the resulting database of 409 properties. A historical context statement was prepared, and approximately half of the 409 properties were evaluated and a quarter of these were recorded on standard California historic resources inventory forms (form DPR 523A Primary Record). Phase 2 evaluated and recorded the remaining properties.

LAUSD 2014 Historic Resources Survey (Draft)

In July 2013, in anticipation of the SUP, LAUSD began the process of updating the survey of historic resources in the District.¹⁸ This process includes developing an updated Historic Context Statement, conducting historic resource surveys of 55 campuses that were not evaluated during the 2002 survey, and preparing design and procedural guidelines to help guide SUP planning efforts and CEQA analysis process

Potential eligibility of schools under Criteria A/1, as outstanding examples of LAUSD design ideals and principles. The history and context of Los Angeles public school design and educational architecture are the particular focus of the 2014 study. Because the postwar era largely fell outside the scope of the 2002 LAUSD historic context statement, this era was examined in detail in the 2014 study.

The study represents not a comprehensive history but rather a first step in better understanding the evolution of school design in the district. Project limitations precluded extensive research on additional aspects of LAUSD's history that might result in eligibility under Criteria A/1 and Criteria B/2. Campus-specific research was conducted on all pertinent topics for each of the schools surveyed. The study includes a section on the typical architectural styles of LAUSD schools to analyze Criteria C/3.

Themes of Significance

The following themes of significance were prepared for LAUSD school property types.

Founding Years, 1875–1894

This theme is embodied in Los Angeles's remaining one- and two-story wood-frame schoolhouses that generally display Late Victorian or vernacular styles. Only three nineteenth-century schoolhouses are known to remain from LAUSD's founding years. Schools constructed during this period display traditional modes of school design, before the Progressive Education Movement and widespread reform changed national construction standards and before increased urbanization necessitated larger-capacity school plants.

¹⁷ See Appendix B-2 for the LAUSD 2002 Survey

¹⁸ See Appendix B-1 for the LAUSD 2014 Draft Survey

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Pre-1933 Long Beach Earthquake School Plants, 1910-1933

This theme reflects an important period for Los Angeles schools. First, it occurred after the Progressive Education Movement had triggered widespread reform of school design throughout the United States. This resulted in a more differentiated, expansive school plant, with specialized facilities and program-specific buildings and classrooms; this ended the era of the monumental, big-block school. Second, this period occurred before a statewide overhaul of school building codes and practices after the 1933 Long Beach earthquake.

This period also began as the 1920s ushered in a school building boom and period-revival golden age in Southern Californian architecture. The importance placed on public education was expressed through beautifully designed school buildings, often created by the region's leading architects. Campus design became more unified, with elaborate approaches and entrances. The advent of more grand entrances, as well as the incorporation of separate auditoriums, sited for ease of public access, reflected a growing sense that public education was a community affair.

Replacing the big-block school, with internal corridors, was a generally lower-massed, spread-out campus. In some examples, designers replaced hallways with covered outdoor walkways. Building plans also evolved, as the traditional rectangular plan took on adjacent wings, in H-shaped, T-shaped, or U-shaped buildings that facilitated the creation of sheltered outdoor spaces and patios. Lower massing was particularly common for elementary schools.

Because most pre-1933 schools were substantially remodeled following the Long Beach earthquake, intact examples from this era are relatively rare. It is common to find 1920s-era schools that were remodeled following the earthquake; such schools might exhibit the building plans and configurations typical of the 1920s but with 1930s PWA Moderne and Streamline Moderne detailing

Post-1933 Long Beach Earthquake Schools, 1933-1945

Following the 1933 Long Beach earthquake, state and city legislation regarding school building codes and practices shifted the character of LAUSD schools and campuses. Requirements of the Field Act (1934), such as maintaining one-story massing for elementary schools and no more than two stories for junior and high schools, mirrored reforms already under way. Classroom wings continued to be designed for connections to the outdoors, with L-, H-, U-, and T-shaped buildings accommodating sheltered courtyard and patio spaces. Continuing another trend under way in the 1920s, campuses displayed an increasingly unified site design, with sheltered corridors linking campus buildings.

The advances of the Progressive Education Movement also continued to shift school plant design. Campuses were increasingly differentiated, with administration buildings, auditoriums and gymnasiums, separate classroom, shop, and specialty wings, and cafeterias. Adequate indirect lighting and ventilation were provided through the use of generous bands of windows, including multilight sashes, casements, and clerestories. Stylistically, these buildings were less ornamental than their 1920s period-revival counterparts. An emphasis was placed on traditional Southern Californian styles, such as the Spanish Colonial and Mission Revival. Other styles included Streamline Moderne, Art Deco, and Late Moderne. Much post-earthquake

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reconstruction was funded through the Public Works Administration (PWA), and many schools exhibit a range of PWA Moderne styles.

Early Experiments in the Modern, Functionalist School, 1933–1945

Although this category shares general characteristics with the preceding theme (Post–1933 Long Beach Earthquake Schools), it is distinguished by an experimental approach to school design that emerged during the Great Depression. Such schools reflect the most avant-garde ideas of the era and the beginning of modern, functionalist school design. Stylistically, the proto-modernist school need not be purely “modern” in the sense of lacking any ornamental detailing. The significant changes reflected a philosophy that went a step further than did the schools of the 1920s in designing for function and integrating school buildings with exterior spaces. During the postwar construction boom, many of the same ideas that characterized these experimental schools became the norm throughout Los Angeles and the United States.

The notable differences between the two themes (or periods) relate to scale, site plan, and functional, child-centered design. The proto-modernist school has an explicitly domestic scale, with low ceilings and a lack of monumental design or massing. These schools generally exhibit a decentralized, nonhierarchical campus, with a strong geometric patterning applied to the site plan. Classroom wings generally consist of one-room-deep rectilinear buildings, lined with adjacent patios and landscaping. Building plans clearly express their function, with (usually) one-story massing, generous expanses of glazing, window sizes and configurations tailored to sun patterns and doors opening directly onto patio areas and courtyards. The preferred typology was the early version of the “finger-plan” school, with rectilinear classroom wings extending from a central axis

Educating the Baby Boom: The Postwar modern Functionalist School Plant, 1945–1969

By the 1950s, many of the design ideas considered experimental in the 1930s had matured and become the national standard for schools. Stylistically, schools might include some historicist detailing reflecting popular styles (such as Colonial Revival). But, overall, a unified campus design, building types and plans that accommodated a high degree of indoor-outdoor integration, ample outdoor spaces, and sheltered corridors marked the typology as the mature version of the functionalist school plant. The priority remained the creation of a domestic scale for schools. Campuses displayed a one-story massing for elementary schools, and up to two stories for middle and high schools. Site plans, which often featured a decentralized, pavilion-like layout, lacked the formality and monumentality that characterized earlier eras of school design.

School types expressive of these ideals include the finger-plan (1940s–1950s) and cluster-plan (1950s), and variations on their basic themes. Combinations of these basic forms, which flexed according to available lot size and school enrollment, are also evident.

For LAUSD, the postwar years brought another round of reform as well as unprecedented expansion. Given the postwar classroom shortage, many campuses were constructed quickly, from standardized plans used district-wide, in designs that convey some of these ideas. The most intact and well-designed campuses among these, though, uniquely represent this era of reform and the midcentury modern school.

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LAUSD and the Civil Rights Movement, 1954–1980

This theme of significance begins with the filing of the landmark U.S. Supreme Court case *Brown v. The Board of Education, Topeka, Kansas*. Although *Brown v. Board of Education* addressed state laws that did not exist in California—namely, laws allowing for racially segregated public schools—this case and the Civil Rights Movement helped generate and focus attention on related issues in Los Angeles. Issues touched on racial division and cultural identity, equal access, and how to create more balance and diversity in public schools. Signaling the end of this period of significance is the U.S. Supreme Court decision effectively ending mandatory school busing as a solution to racial imbalance in California’s public schools. Although this issue continued to form part of the social context for LAUSD, this period captures an era of intense debate and activism on the part of community members, parents, politicians and jurists, as well as teachers and administrators.

A school eligible under this theme might be the site of significant integration initiatives, challenges, or community activities related to the Civil Rights Movement and school integration. This might include initiatives for equal access to schools and/or to employment opportunities in LAUSD schools.

In addition, a school might qualify under this theme for a long-term association with a figure who was significant in the Civil Rights Movement and school integration.

LAUSD Historical Resources Table 5.5-2 provides the results of the 2004 inventory. Each of the campuses or properties listed had one or more buildings that were identified as historically significant, meeting the criteria for listing in the NRHP or the CRHR or both. Additional schools may be added to this list as more research is performed or as additional schools meet the criteria. Table 5.5-2 also shows that there are more sites listed as historically significant in the Central area of the district than in the Valley and the South areas.

The Valley Area described in Table 5.5-2 corresponds to the current North ESC; the Central Area corresponds to the East and West ESC except for the southeastern portion of the West ESC; and the South Area corresponds to the South ESC plus the southeastern portion of the West ESC.

Table 5.5-2 2004 Schools Identified as Historically Significant

Campus Name	School Type	Street Number	Street Direction	Street Name	Street Type	City	ZIP		CHRSC
Valley Area (current North ESC)									
Canoga Park	ES	7438		Topanga Canyon	Blvd	Canoga Park	91303		2S2
Canoga Park	SH	6850		Topanga Canyon	Blvd	Canoga Park	91303		3CS
Carpenter Avenue	ES	3909		Carpenter	Ave	Studio City	91604		2S2
Kester Avenue	ES	5353		Kester	Ave	Van Nuys	91411		3CS
Lankershim	ES	5250		Bakman	Ave	North Hollywood	91601		5S3
Lokrantz, Sven Special Ed Ctr.	SS	19451		Wyandotte	St	Reseda	91335		3CS
Morningside	ES	576	N	MacLay	Ave	San Fernando	91340		2S2
North Hollywood	SH	5231		Colfax	Ave	North Hollywood	91601		2S2
Pacoima	ES	11016		Norris	Ave	Pacoima	91331		3CS
Reed, Walter	MS	4525		Irvine	Ave	North Hollywood	91602		3S

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Table 5.5-2 2004 Schools Identified as Historically Significant

Campus Name	School Type	Street Number	Street Direction	Street Name	Street Type	City	ZIP		CHRSC
Reseda	ES	7265		Amigo	Ave	Reseda	91335		2S2
San Fernando	MS	130	N	Brand	Blvd	San Fernando	91340		2S2
17th Street	ES	644	W	17th	St	Los Angeles	90015		2S2
Van Nuys	SH	6535		Cedros	Ave	Van Nuys	91411		3S
Verdugo Hills	SH	10625		Plainview	Ave	Tujunga	91042		3S
Central Area (Current East and West ESC except for the southeastern portion of the West ESC)									
2nd Street	ES	1942	E	2nd	St	Los Angeles	90033		2S2
10th Street	ES	1000		Grattan	St	Los Angeles	90015		3CS
24th Street	ES	2055	W	24th	St	Los Angeles	90018		2S2
49th Street	ES	750	E	49th	St	Los Angeles	90011		3CS
Adams, John	MS	151	W	30th	St	Los Angeles	90007		3CS
Aldama	ES	632	N	Avenue 50		Los Angeles	90042		3S
Alta Loma	ES	1745		Vineyard	Ave	Los Angeles	90019		3S
Arlington Heights	ES	1717		Seventh	Ave	Los Angeles	90019		2S2
Berendo	MS	1157	S	Berendo	St	Los Angeles	90006		3S
Broadway	ES	1015		Lincoln	Blvd	Venice	90291		3CS
Buchanan Street	ES	5024		Buchanan	St	Los Angeles	90042		2S1
Burroughs, John	MS	600	S	McCadden	Pl	Los Angeles	90005		3S
Dorris Place	ES	2225		Dorris	Pl	Los Angeles	90031		3S
Eagle Rock	ES	2057		Fair Park	Ave	Los Angeles	90041		3CS
El Sereno	MS	2839	N	Eastern	Ave	Los Angeles	90032		3S
Euclid Avenue	ES	806		Euclid	Ave	Los Angeles	90023		3CS
Garvanza	ES	317	N	Avenue 62		Los Angeles	90042		2S2
Glassell Park	ES	2211	W	Avenue 30		Los Angeles	90065		3S
Grant	ES	1530	N	Wilton	Pl	Los Angeles	90028		2S2
Hamasaki, Morris K.	ES	4865	E	First	St	Los Angeles	90022		3S
Hamilton, Alexander	SH	2955	S	Robertson	Blvd	Los Angeles	90034		2S2
Hancock Park	ES	408	S	Fairfax	Ave	Los Angeles	90036		2S2
Hobart Boulevard	ES	980	S	Hobart	Blvd	Los Angeles	90006		3CS
Hollenbeck	MS	2510	E	6th	St	Los Angeles	90023		2S2
Hollywood	SH	1521	N	Highland	Ave	Los Angeles	90028		3S
Irving, Washington	MS	3010		Estarra	Ave	Los Angeles	90065		3S
Jefferson, Thomas	SH	1319	E	41st	St	Los Angeles	90011		3S
LA CES/Pasteur, Louis	Mag	5931	W	18th	St	Los Angeles	90035		2S2
Los Feliz	ES	1740	N	New Hampshire	Ave	Los Angeles	90027		2S2
Marshall, John	SH	3939		Tracy	St	Los Angeles	90027		2S2
Nightingale, Florence	MS	3311	N	Figuroa	St	Los Angeles	90065		3CS
Old Canyon School	N/A	421		Entrada	Dr	Santa Monica	90402		3S
Old Farmdale School	N/A	2839	N	Eastern	Ave	Los Angeles	90032		3S
Old Vernon Avenue School	N/A	450	N	Grand	Ave	Los Angeles	90012		3S
Pacific Palisades	ES	800		Via de la Paz		Pacific Palisades	90272		3S
Perez, Alfonso B. Special Education Center	SS	4540		Michigan	Ave	Los Angeles	90022		3CS
Santa Monica Boulevard	ES	1022	N	Van Ness	Ave	Los Angeles	90038		2S2

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Table 5.5-2 2004 Schools Identified as Historically Significant

Campus Name	School Type	Street Number	Street Direction	Street Name	Street Type	City	ZIP		CHRSC
Solano Avenue	ES	615		Solano	Ave	Los Angeles	90012		3CS
Soto Street	ES	1020	S	Soto	St	Los Angeles	90023		2S2
University	SH	11800		Texas	Ave	Los Angeles	90025		2S2
Utah Street	ES	255	N	Clarence	St	Los Angeles	90033		3CS
Van Ness	ES	501	N	Van Ness	Ave	Los Angeles	90004		2S2
Venice	SH	13000		Venice	Bldv	Los Angeles	90066		3S
Vine Street	ES	955	N	Vine	St	Los Angeles	90038		2S2
Virgil	MS	152	N	Vermont	Ave	Los Angeles	90004		3S
West Vernon Avenue	ES	4312	S	Grand	Ave	Los Angeles	90037		3CS
Wright, Orville	MS	6550	W	80th	St	Los Angeles	90045		3S
Yorkdale	ES	5687		Meridian	St	Los Angeles	90042		3CS
South Area (current South ESC plus southeast part of West ESC)									
52nd Street	ES	816	W	51st	St	Los Angeles	90037		3S
66th Street	ES	6600	S	San Pedro	St	Los Angeles	90003		3S
109th Street	ES	10915		McKinley	Ave	Los Angeles	90059		3S
Angeles Mesa	ES	2611	W	52nd	St	Los Angeles	90043		2S
Baldwin Hills	ES	5421		Rodeo	Rd	Los Angeles	90016		3S
Bandini Street	ES	425	N	Bandini	St	San Pedro	90731		2S2
Barton Hill	ES	423	N	Pacific	Ave	San Pedro	90731		3S
Bell	SH	4328		Bell	Ave	Bell	90201		3CS
Bryson Avenue	ES	4470		Missouri	Ave	South Gate	90280		3CS
Carson Street	ES	161	E	Carson	St	Carson	90745		3CS
Cienega	ES	2611	S	Orange	Dr	Los Angeles	90016		S
Corona Avenue	ES	3825		Bell	Ave	Bell	90201		3S
Dorsey, Susan Miller	SH	3537		Farmdale	Ave	Los Angeles	90016		3S
Eshelman Avenue	ES	25902		Eshelman	Ave	Lomita	90717		2S2
Fremont, John C.	SH	7676	S	San Pedro	St	Los Angeles	90003		3S
Fries Avenue	ES	1301		Fries	Ave	Wilmington	90744		3CS
Gompers, Samuel	MS	234	E	112th	St	Los Angeles	90061		2S2
Graham	ES	8407	S	Fir	Ave	Los Angeles	90001		3CS
Gulf Avenue	ES	828	W	L	St	Wilmington	90744		2S2
Huntington Park	SH	6020		Miles	Ave	Huntington Park	90255		3S
Jordan, David Starr	SH	2265	E	103rd	St	Los Angeles	90002		3CS
Lomita Fundamental Magnet	ES	2211	W	247th	St	Lomita	90717		3CS
Mann, Horace	MS	7001	S	St. Andrews	Pl	Los Angeles	90047		3CS
Manual Arts	SH	4131	S	Vermont	Ave	Los Angeles	90037		2S2
Miramonte	ES	1400	E	68th	St	Los Angeles	90001		2S2
Muir, John	MS	5929	S	Vermont	Ave	Los Angeles	90044		3CS
Point Fermin	ES	3333		Kerckhoff	Ave	San Pedro	90731		3CS
Ritter	ES	11108		Watts	Ave	Los Angeles	90059		2S2
San Gabriel Avenue	ES	8628		San Gabriel	Ave	South Gate	90280		3CS
San Pedro	AS	950	W	Santa Cruz	St	San Pedro	90731		2S2
South Gate	MS	4100		Firestone	Bldv	South Gate	90280		2S2
South Gate	SH	3351		Firestone	Bldv	South Gate	90280		3S

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Table 5.5-2 2004 Schools Identified as Historically Significant

Campus Name	School Type	Street Number	Street Direction	Street Name	Street Type	City	ZIP		CHRSC
South Park	ES	8510		Towne	Ave	Los Angeles	90003		3CS
State Street	ES	3211		Santa Ana	St	South Gate	90280		3CS
State Street Children's Center	CC	3210		Broadway		Huntington Park	90255		3CS
State Street Children's Center	ES	3210		Broadway		Huntington Park	90255		3CS
Vernon City	ES	2360	E	Vernon	Ave	Los Angeles	90058		3CS
Virginia Road	ES	2925		Virginia	Rd	Los Angeles	90016		3S

CHRSC Status Codes:

2S: Individual property determined eligible for the National Register by the Keeper. Listed in the California Register.

2S2: Individual property determined eligible for the National Register by a consensus through Section 106 process.

Listed in the California Register.

3CS: Appears eligible for the California Register as an individual property through survey evaluation.

The 2014 Historic Resources Survey found that the following 15 of 56 LAUSD campuses appear eligible for either the National Register and/or the California Register

- 156th Street Elementary School..... Eligible for California Register (3CD)
- Castle Heights Elementary School Eligible for California Register (3CD)
- Chatsworth Senior High School Eligible for National Register (3D)
- Cleveland Senior High School..... Eligible for National Register (3D)
- Colfax Avenue Elementary School..... Eligible for California Register (3CD)
- Dodson Middle School..... Eligible for California Register (3CD)
- Fernangeles Elementary School..... Eligible for California Register (3CD)
- Leapwood Avenue Elementary School..... Eligible for National Register (3D)
- Narbonne Senior High School..... Eligible for California Register (3CD)
- Olive Vista Middle School Eligible for California Register (3CD)
- Pacoima Middle School Eligible for California Register (3CD)
- Palisades Senior High School Eligible for National Register (3D)
- Parmelee Avenue Elementary School Eligible for California Register (3CD)
- Topanga Charter Elementary School..... Eligible for National Register (3D)
- Webster Middle School Eligible for California Register (3CD)

Of the 41 campuses found ineligible for listing in the National or California Registers:

- Three campuses were found to meet the eligibility standards described for postwar LAUSD schools in the LAUSD Historic Context Statement but did not retain sufficient integrity to convey their period of significance; these campuses did not qualify under other applicable criteria;

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- Thirty-eight were found not eligible under applicable criteria, including the context of institutional architectural/educational facilities in Los Angeles as described in the LAUSD Historic Context Statement.

Paleontological Resource Setting

Paleontological resources are fossils, that is, evidence of past life on earth, including bones, shells, leaves, tracks, burrows, and impressions. The La Brea Tar Pits, one of the best-known discovery sites of ice-age fossils in the world, is described above in Section 5.5.1.2, *Natural Setting*. Many fossil-containing rock formations in the Santa Monica Mountains are described in the “Santa Monica Mountains National Recreation Area Paleontological Survey” conducted by the National Park Service in 2004. Over 2,300 fossil localities have been found within the Santa Monica Mountains National Recreation Area (SMMNRA); the eastern part of the SMMNRA is within the District. Fossils described range in age from late Jurassic to Quaternary. (The Jurassic Period extends from 200 million to 146 million years before present, and the Quaternary Epoch extends from 1.8 million ybp to the present.) Types of fossils include mollusks, sand dollars, barnacles, plants, wood, mammals, algae, crabs and other crustaceans, fishes including sharks, whales, sea lions, horses, birds, rodents, camel, bison, tapir, mammoth, mastodon, and giant ground sloth. Two fossil localities are described in the aforementioned paleontological survey: Fossil Ridge Park and Old Topanga Canyon, both in the District.¹⁹ Most fossil localities in the City of Los Angeles are in local mountains.²⁰

5.5.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the CRHR, including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

¹⁹ National Park Service. 2004, January. Santa Monica Mountains National Recreation Area Paleontological Survey. http://www.nature.nps.gov/geology/paleontology/surveys/SAMO_survey_2_low_res.pdf.

²⁰ City of Los Angeles. 2001, September. Conservation Element of the City of Los Angeles General Plan. <http://planning.lacity.org/cwd/gnlpln/ConsvElt.pdf>.

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The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, or is not included in a local register of historical resources, does not preclude a lead agency from determining that the resource may be a historical resource.²¹

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- CUL-1 Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.
- CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- CUL-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- CUL-4 Disturb any human remains, including those interred outside of formal cemeteries.

5.5.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.5-1: SUP-related projects may cause a substantial adverse change in the significance of historical resources. [Threshold CUL-1]

All Projects Involving Historic Resources

The SUP may result in demolition or destruction of historical resources; relocation, conversion, rehabilitation, or alteration of historical resources that substantially impairs the significance of the resources; and/or changes to the immediate surroundings of a historical resource that materially impairs the significance of the resource.

Potential new school sites, sites for expansions of existing schools, and existing schools throughout the District contain historical resources. The degree and kind of any impacts to historical resources under the SUP depends on the specific sites selected and the nature of the historical resources, if any, in or next to those sites.

LAUSD has not identified site-specific projects to be constructed under the SUP; therefore, the nature and magnitude of any historical resource impacts, if any, cannot be determined. However, the potential for significant impacts does exist. Based on this potential this analysis describes: (1) the methodology for site-specific determinations for presence or absence of historical resources; (2) project design features or other LAUSD procedures that apply performance standards to reduce impacts during site selection and design phase when a site is identified as containing historical resources

²¹ Public Resource Code, Section 5024.1; 14 CCR Section 4852.

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As required by CEQA Guidelines Section 15168 (c), once a new school site is identified for acquisition or an existing school campus is identified for modification, the LAUSD conducts a historic resource review pursuant to the LAUSD Cultural Resource Assessment Procedures.²² These procedures ensure that any potential historical resources will be identified using qualified professionals (architectural master reviewer, archaeological master reviewer, qualified architectural historian) and a consistent methodology. The method for identifying cultural resources includes site reconnaissance, an evaluation of CRHR eligibility, and, where required, an intensive survey

When a historical resource is identified, LAUSD must consider: (1) whether the proposed project would result in potentially significant impacts on the historical resources, and (2) if so, whether project design alternations or other feasible measures or alternatives would avoid or substantially reduce the impacts. Each project that may impact an historic resource will include implementation of OEHS CEQA Specification Manual, Appendix H, Historical Resources and PDF CUL-1 through PDF CUL-9 for relocation, conversion, rehabilitation, alteration, damage or demolition of an historical resource.

If, after consideration of all feasible measures and alternatives, that historic resource impacts are unavoidable, then prior to project approval a CEQA Statement of Overriding Consideration (SOC) must be adopted by the Board of Education. The SOC must outline the benefits of the project and why they outweigh the significant historic resource impact. Because there are no measures available that would avoid, reduce, rectify, or minimize the possible demolition or permanent damage to an historic building or structure or the cumulative loss of historic resources in the District, this impact is considered potentially significant and may not be feasibly mitigated to a level of insignificance.

Impact 5.5-2: SUP implementation would not cause a substantial adverse change in the significance of archaeological resources. [Threshold CUL-2]

All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

Grading, excavation, or other ground-disturbing activities during construction could damage previously undiscovered archaeological resources. Site-specific impacts cannot be determined until a location is identified for a project. However, the potential for significant impacts does exist. Based on this potential this analysis describes: (1) the methodology for site-specific determinations for presence or absence of archeological resources; (2) project design features or other LAUSD procedures that apply performance standards to reduce impacts when a site is identified as having the potential to affect archeological resources.

Once a new school site is identified for acquisition or an existing school site is identified for modification, the LAUSD conducts an archeological resource review pursuant to the LAUSD Cultural Resource Assessment Procedures. The procedures ensure that unique archaeological resources would be identified through a phased investigation using qualified professional consultants and a consistent methodology. The Cultural Resource Assessment Procedures identify and define certain archaeological resource experts that will play key roles in identifying archaeological resources.

²² LAUSD OEHS CEQA Specification Manual, Appendix H-Historical Resources Policy, (Appendix E.2) LAUSD *Cultural Resource Assessment Procedures*. December 2005, Revised June 2007.

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When a Phase I investigation (records check, background research, consultation, a field survey) identifies possible archaeological resources on a project site, the project site will be abandoned or a Phase II investigation will proceed. When a Phase II evaluation (limited subsurface testing, inventorying and evaluation) identifies unique archaeological resources a Phase III Data Recovery/Mitigation Program is conducted if the site is still being considered. Once the site's archaeological resources are characterized through the assessment process, LAUSD considers (1) whether the proposed project would result in potentially significant impacts to unique archaeological resources, and (2) if so, whether project design features (PDFs) or other feasible measures or alternatives would avoid or substantially reduce the impacts. Each project that may impact an archeological resource will include implementation of OEHS CEQA Specification Manual, Appendix H, Historical Resources and PDF CUL-10 through PDF CUL-15 for assessment, monitoring, protection and salvage of resources. Impacts would be less than significant.

Impact 5.5-3: The SUP-related projects are not anticipated to destroy paleontological resources or unique geologic features. [Threshold CUL-3]

All projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

Grading, excavation, or other ground-disturbing activities during construction could damage previously undiscovered fossils. Once a project site is identified for acquisition or an existing school site is identified for modification, the LAUSD would conduct a paleontological investigation pursuant to the LAUSD Cultural Resource Assessment Procedures.²³ The procedures ensure that unique paleontological resources will be investigated before projects are approved. Under the procedures, the LAUSD's qualified archaeologist will consult with the Los Angeles County Museum of Natural History, Vertebrate Paleontology Department to determine whether paleontological specimens have been found at the site, the likelihood that a site in that area could yield significant specimens, and recommendations for additional studies, as warranted. If LAUSD determines that paleontological resources are not likely to be found in that area, no further studies are required.

If a paleontological investigation identifies the possibility of unique paleontological resources on a proposed project site or a likelihood that such resources are onsite the District considers (1) whether the proposed project would result in potentially significant impacts to those resources, and (2) if so, whether project design features (PDFs) or other feasible measures or alternatives would avoid or substantially reduce the impacts

Each project that may impact unique paleontological resources will implement OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy and PDF CUL-17 and PDF CUL-18 for assessment, monitoring, protection and salvage of potential resources. Impacts would be less than significant

²³ LAUSD OEHS CEQA Specification Manual, Appendix H, Cultural Resource Assessment Procedures. December 2005, Revised June 2007.

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Impact 5.5-4: Grading activities are not anticipated to disturb human remains. [Threshold CUL-4]

All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

The Los Angeles Basin has been inhabited by the Gabrielino-Tongva Tribe and their ancestors for over 5,000 years. Thus, human remains could be found in grading and/or excavation for construction projects.²⁴ Specific sites for SUP projects have not been identified thus far, and therefore site-specific impacts cannot presently be identified.

CEQA Guidelines Section 15064.5(d) outlines the required process for evaluating, treating, and mitigating impacts based on discovery of human remains. LAUSD would follow the measures specified in the CEQA Guidelines to determine early in the process of project review whether or not there is the potential for human remains.

In the event of accidental discovery of human remains the District and its construction contractors would comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Sections 5097.9 et seq. California Health and Safety Code Section 7050.5 requires that construction activity stop until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommends treatment and disposition of the human remains. If the coroner determines that the remains are not subject to their authority and if the human remains are Native American, within 24 hours they will contact the Native American Heritage Commission. Additionally, each project that may impact Native American resources will implement OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy and PDF CUL-16 for protection and salvage of resources. Impacts would be less than significant.

5.5.4 Applicable Regulations and Standard Conditions

Federal

- National Historic Preservation Act
- Archaeological Resources Protection Act
- Native American Graves Protection and Repatriation Act
- National Register Federal Program Regulations: Qualifications for and nomination of properties to the NRHP

State

- California Public Resources Code Sections 5079–5079.65: Qualifications for and nomination of properties to the CRHR.

²⁴ “Construction projects” here means any project involving construction, including new construction, modernization, replacement, upgrade, remodel, renovation, and installation projects that would involve grading, excavation, or other ground-disturbing activities

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- California Public Resources Code Sections 5097.9–5097.99: Protections for Native American historical and cultural resources and sacred sites.
- California Health and Safety Code Section 7050.5: Procedures in the event of accidental discovery of human remains.

LAUSD Standards

- OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy. (2004 PEIR Appendix E.2, LAUSD Cultural Resource Assessment Procedures).
- Project Design Features: PDF CUL-1, PDF CUL-2, PDF CUL-3, PDF CUL-4, PDF CUL-5, PDF CUL-6, PDF CUL-7, PDF CUL-8, PDF CUL-9, PDF CUL-10, PDF CUL-11, and PDF CUL-12.

5.5.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standards listed above, the following impacts would be less than significant: 5.5-2, 5.5-3, and 5.5-4.

Even with implementation of regulatory requirements and LAUSD Standards the following impacts would be **potentially significant**:

- Impact 5.5 1: SUP-related project implementation may substantially degrade the significance of historical resources.

5.5.6 Mitigation Measures

Impact 5.5-1

There are no additional measures that would further reduce significant impacts to historic resources.

Impact 5.5-2, 5.5-3, and 5.5-4

No mitigation measures are required.

5.5.7 Level of Significance After Mitigation

Impact 5.5-1

Each project that may impact an historic resource will include implementation of OEHS CEQA Specification Manual, Appendix H, Historical Resources and PDF CUL-1 through PDF CUL-9 to reduce impacts from relocation, conversion, rehabilitation, alteration, damage or demolition of an historical resource. LAUSD Standards would reduce historic resource impacts to the extent feasible; however, no mechanism for the full mitigation has been established. Therefore, even with the LAUSD Standards, impacts associated with the demolition or damage to a historic resource would remain significant and unavoidable.

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Impact 5.5-2, 5.5-3, and 5.5-4

Impacts would be less than significant.

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