

3.4 Cultural Resources

This section identifies cultural resources present within the project area, evaluates the potential project-related impacts on those resources, and provides mitigation measures, as applicable. The survey of cultural resources was conducted under the provisions of Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines. The environmental setting and analysis in this section relies on information from the *Cultural Resources Screening Memorandum*, 2015, presented in Appendix E.

As noted in the analysis below, with the implementation of a mitigation measure, direct and indirect impacts associated with cultural resources during construction and operation would be less than significant.

3.4.1 Regulatory Setting

Cultural resources fall within the jurisdiction of several levels of government. State and local jurisdictions provide the framework for the identification, documentation, and protection of such resources. The National Historic Preservation Act (NHPA), CEQA, California Public Resources Code (PRC) Section 5024, City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code Section 22.130), and State Health and Safety Code (HSC) Section 7050.5/PRC Section 5097.9 are the primary laws that govern and affect the preservation of cultural resources of national, state, regional, and local significance.

3.4.1.1 National Register of Historic Places

To determine whether an undertaking could affect National Register of Historic Places- (NRHP-) listed or eligible properties, cultural resources (including archaeological, historical, and architectural properties) must be inventoried and evaluated for listing in the NRHP. For projects involving a federal agency, cultural resource significance is evaluated in terms of eligibility for listing in the NRHP. In order for a property to be considered to be included in the NRHP, it must meet the criteria for evaluation set forth in 36 Code of Federal Regulations (CFR) Part 60.4, as follows.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of design, setting, materials, workmanship, feeling, association, and:

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

Among other criteria considerations, a property that has achieved significance within the last 50 years is not considered eligible for inclusion in the NRHP unless certain exceptional conditions are met.

3.4.1.2 State

California Environmental Quality Act

In accordance with Section 21084.1 of CEQA, the Proposed Project would have a significant adverse environmental impact if it, “causes a substantial or potentially substantial adverse change in the significance of an historical resource.” Paleontological resources are also provided protection as historical resources, as discussed in State CEQA Guidelines Section 15064.5(a)(3).

Section 21084.1 defines historical resources as any resource listed or determined eligible for listing in the California Register of Historical Resources (CRHR). Properties listed or determined eligible for listing in the NRHP, such as those identified in the Section 106 process, are automatically listed in the CRHR, pursuant to 14 California Code of Regulations (CCR) Section 4851 (a)(1). Therefore, all historic properties under federal preservation law are automatically historical resources under state preservation law. Historical resources are also presumed to be significant if they are included in a local register of historical resources or identified as significant in a qualified historical resource survey.

State law in Title 14, CCR Section 4850, defines historical resource as follows:

Any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural history of California.

For the purposes of CEQA, historical resource is further defined under PRC Section 15064.5 as a “resource listed, or determined eligible for listing, in the California Register.”

Section 15064.5 of the State CEQA Guidelines sets forth the criteria and procedures for determining significant historical resources and the potential effects of a project on such resources. Generally, the lead state agency shall consider a historical resource to be historically significant if the resource meets any of the criteria for listing in the CRHR.

City statutes and guidelines specify how historical resources are to be managed in the context of projects such as the Proposed Project. Archival and field surveys must be conducted, and identified historical resources must be inventoried and evaluated against the Secretary of Interior Standards.

California Register of Historical Resources

NHPA mandated the selection and appointment in each state of a State Historic Preservation Officer (SHPO). Each SHPO is tasked with, among other duties, maintaining an inventory of historic properties. In California, the state legislature established additional duties for the SHPO. These include the maintenance of the CRHR. Established by PRC Section 5024.1(a) in 1992, the CRHR serves as “an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent feasible, from substantial adverse change.” According to PRC Section 5024.1(c), the CRHR criteria broadly mirror those of the NRHP. The CRHR criteria are found at PRC Section 5024.1(c) as follows.

An historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The minimum age criterion for the CRHR, as with the NRHP, is 50 years. Properties less than 50 years of age may be eligible for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance. In addition to meeting one or more of the historical significance criteria, the resource must possess integrity. Integrity is defined as “the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.”

There are several ways for resources to be included in the CRHR. A resource can be listed in the CRHR based upon a nomination and public consideration process. Additionally, a resource that is subject to a discretionary action by a governmental entity will be evaluated for eligibility for the CRHR. As previously stated, properties listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

California Environmental Quality Act—Tribal Cultural Resources

Recent legislation known as Assembly Bill 52 amended CEQA to add another category of cultural resource—Tribal Cultural Resources (TCRs). TCRs are defined as follows.

- (a) “Tribal cultural resources” are either of the following:
 - (1) Sites, features, places, and objects with cultural value to descendant communities or cultural landscapes, that are any of the following:
 - (A) Included in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 - (C) A resource deemed to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.
 - (2) Sacred places including, but not limited to, Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines that meet either of the following criteria:
 - (A) Listed on the California Native American Heritage Commission's Sacred Lands File pursuant to Section 5097.94 or 5097.96 for which a Native American tribe has submitted sufficient evidence demonstrating that the sacred places are of special religious or social significance to the Native American tribe or contain known graves and cemeteries of Native Americans.
 - (B) Listed or determined pursuant to criteria set forth in subdivision (g) of Section 5024.1 to be eligible for listing in the California Register of Historical Resources.

- (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

State Health and Safety Code, Section 7050.5/California Public Resources Code, Section 5097.9

State Health and Safety (HSC) Code Section 7050.5 and PRC Section 5097.9 contain provisions for the treatment of human remains contained in archaeological sites. Under HSC Section 7050.5, if human remains are discovered during any project activity, the county coroner must be notified immediately. If human remains are exposed, HSC Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Construction must halt in the area of the discovery of human remains, the area of the discovery shall be protected, and consultation and treatment shall occur as prescribed by law. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours. NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased person so they can inspect the burial site and make recommendations for treatment or disposal.

3.4.1.3 Local

City of Los Angeles Cultural Heritage Ordinance

The City of Los Angeles maintains a list of all sites, buildings, and structures that have been designated through the Cultural Heritage Ordinance as Historic-Cultural Monuments (HCMs).

Historic-Cultural Monument

Section 22.171.7 of the Cultural Heritage Ordinance states that an HCM is any site (including significant trees or other plant life on the site), building, or structure of particular historic or cultural significance to the city, including historic structures or sites in which the broad cultural, economic, or social historic of the nation, state, or community is reflected or exemplified; or that is identified with historic personages or with important events in the main currents of national, state, or local history; or that embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style, or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

Any person may apply for the proposed designation of HCM, and the Cultural Heritage Commission determines whether or not the proposed designation merits consideration. If the Commission recommends approval of the application and it is included in the list of HCMs, no permit for the demolition, substantial alteration, or relocation of an HCM may be issued (Section 22.171.14) unless:

1. The Superintendent of Building or City Engineer determines that the demolition, relocation, or substantial alteration is necessary in the interest of the public health, safety or general welfare;
2. The substantial alteration complies with the Secretary of the Interior’s Standards for Rehabilitation;

3. The substantial alteration protects and preserves the historic and architectural qualities and the physical characteristics that make the site, building, or structure a designated HCM; and
4. The proposed action is in compliance with CEQA (PRC Section 21000 et seq.).

City of Los Angeles Conservation Element

The Conservation Element of the City of Los Angeles General Plan (adopted September 2001) is designed to enhance, preserve, and protect the city's existing natural resources and other resources. The Conservation Element specifically addresses archaeological and paleontological resources in Section 3 of Chapter 2. The Conservation Element's paleontological objective is to "protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes." Moreover, its policy is to "continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities."

3.4.2 Environmental Setting

The residences in the general vicinity of the Project Site date from 1964 to 2000 and are a mix of two- to three-story, single- and multi-family residences; there is a very large apartment complex at 3726 Via Dolce to the east of the Project Site. In addition to the mix of construction periods, the neighborhood displays a mix of architectural styles.

No sites or other resources are known from the immediate project area that are categorized as TCRs. The village sites and cemetery areas at Ballona Wetlands probably do meet this definition, but these areas are more than 2 miles southeast of the Project Site. There are also no known paleontological resources located on-site or within the immediate area. The Venice Canal System, including the Grand Canal is a City of Los Angeles Historic-Cultural Monument and is located adjacent to the Project Site.

3.4.2.1 Geological Setting

The project area is on the western margin of the boundaries of Ballona Lagoon, a broad, swampy marsh that existed in the area until twentieth century development (USGS 1896, 1924, 1934). This area is within the Southwest Sewer Subregion of the Framework EIR Element of the General Plan. The geologic formation underlying the project area is tentatively identified as clay and sand of existing marshlands (Dibblee 2007). These sediments are Holocene in age, and are less than 10,000 years old. Sediment in the project area may also derive from beach dune sands deposited along the lee of the Pacific Ocean, which are also Holocene in age (Dibblee 2007).

3.4.2.2 Prehistoric Background

The prehistoric occupation of Southern California is divided chronologically into four temporal phases, or horizons (Moratto 1984). Horizon I, or the Early Man Horizon, began at the first appearance of people in the region (approximately 12,000 years ago) and continued until about 5000 B.C. Although little is known about these people, it is assumed that they were semi-nomadic and subsisted primarily on game.

Horizon II, also known as the Millingstone Horizon or Encinitas Tradition, began around 5000 B.C. and continued until about 1500 B.C. The Millingstone Horizon is characterized by widespread use of milling stones (manos and metates), core tools, and few projectile points or bone and shell artifacts.

This horizon appears to represent a diversification of subsistence activities and a more sedentary settlement pattern. Archaeological evidence suggests that hunting became less important and that reliance on collecting shellfish and vegetal resources increased (Moratto 1984).

Horizon III, the Intermediate Horizon or Campbell Tradition, began around 1500 B.C. and continued until about A.D. 600–800. Horizon III is defined by a shift from the use of milling stones to increased use of mortar and pestle, possibly indicating a greater reliance on acorns as a food source. Projectile points become more abundant and, together with faunal remains, indicate increased use of both land and sea mammals (Moratto 1984).

Horizon IV, the Late Horizon, which began around A.D. 600–800 and terminated with the arrival of Europeans, is characterized by dense populations; diversified hunting and gathering subsistence strategies, including intensive fishing and sea mammal hunting; extensive trade networks; use of the bow and arrow; and a general cultural elaboration (Moratto 1984).

About 1 mile south of the project area is Ballona Wetlands, the remains of a major marshland that has been much studied by archaeologists. Several major prehistoric sites have been found within Ballona Wetlands, including extensive villages. The location of these sites includes the Westchester bluffs south of the wetlands, and raised terraces at the edge of the Ballona Wetlands overlooking Ballona Creek. The mouth of Ballona Wetlands, a setting similar to the project area, does not encompass any known sites.

3.4.2.3 Ethnographic Background

The project area lies within the territory of the Gabrielino Native American people (Bean and Smith 1978). The Gabrielino are characterized as one of the most complex societies in native Southern California, second perhaps only to the Chumash, their coastal neighbors to the northwest. This complexity derives from their overall economic, ritual, and social organization (Bean and Smith 1978:538; Kroeber 1925:621).

The Gabrielino, a Uto-Aztecan (or Shoshonean) group, may have entered the Los Angeles Basin as recently as 1500 Before Present (B.P.). In early protohistoric times, the Gabrielino occupied a large territory including the entire Los Angeles Basin. This region encompasses the coast from Malibu to Aliso Creek, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern parts of the Santa Ana Mountains, and much of the middle to the lower Santa Ana River. They also occupied the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 residential communities with populations ranging from 50 to 150 individuals. The Gabrielino had access to a broad and diverse resource base. This wealth of resources, coupled with an effective subsistence technology, well-developed trade network, and ritual system, resulted in a society that was among one of the most materially wealthy and culturally sophisticated cultural groups in California at the time of contact.

3.4.2.4 Historic Background

Spanish occupation of California began in 1769, at San Diego. Mission San Gabriel was established in the Los Angeles Basin in 1771 and the Los Angeles Pueblo was established as a civilian settlement on September 4, 1781. This village housed 44 people, with a military guard of four soldiers (Dillon 1994).

Mexico rebelled against Spain in 1810, and by 1821 Mexico, including California, achieved independence. In 1833, Mexico declared an end to the Missions and secularized the religious order's land holdings. The Mexican Republic began to grant private land to citizens to encourage immigration to California. Huge land grant ranchos took up large sections of land in California. The project area was included in Rancho La Ballona, granted to Agustin Machado and Felipe Talamantes in 1839.

Cattle ranching came to overshadow the agricultural economy in the region during the Mexican Period, and industries and trade grew around this shift. San Pedro, south of Los Angeles, became a major port for export of tallow and hides to Boston and Europe.

At the conclusion of the Mexican-American War in 1848, Alta California was ceded to the United States. Four years later, in October 1852, the Hispanic families owning Rancho La Ballona filed their claims with the Land Commission for the confirmation of their grant. As required by U.S. law, the Rancho La Ballona grant was surveyed by Henry Hancock in 1858. The grant rancho lasted until 1865, when Agustin Machado died, and numerous heirs were granted small parcels.

The land boom of the 1880s heavily affected Los Angeles. Throughout the 1890s and into the early 1910s and 1920s, as the old ranchos were bought up and subdivided by new Euroamerican owners, the cities of Santa Monica, Culver City, Venice, and Inglewood and the communities of Playa del Rey, and Westchester were platted and the land quickly sold off. The railroad came through the area in the 1890s. In 1892, the California Central Railroad, Santa Fe Railroad's local subsidiary, completed a spur line from old "Port Ballona" tracks to Ocean Park. By the end of the century, the line was known as the Southern California Railroad.

The following section is excerpted from the historic context prepared for the *Venice Community Plan Area Historic Resources Survey Report* in support of SurveyLA (Historic Resources Group 2015).

...The project area was first developed at the turn of the 20th century. In 1891, tobacco magnate and real estate developer Abbot Kinney and his business partner, Francis G. Ryan, purchased a 1.5 mile-long strip of beachfront land located south of Santa Monica. The 275-acre parcel had originally comprised a portion of Rancho La Ballona and was initially settled by the Machado and Talamantes families in the early 1800s. The northern third of the acreage was located in the city of Santa Monica. However, the remainder of the land, located south of present-day Marine Street, was situated in county territory and consisted of wetlands, with sand dunes and marshes that often flooded in the winter.

Kinney and Ryan turned their attention to the northern portion of the tract, where they developed a resort community which eventually came to be known as Ocean Park. Abbot Kinney would likely have dedicated his career to developing Ocean Park; however, in 1898, Francis Ryan died suddenly at the age of 47. Kinney eventually acquired three new business partners in 1902: Alexander Fraser, Henry Gage, and George Merritt Jones. Competition from other developers motivated Kinney and his partners to make improvements to the community of Ocean Park and to expand their development further south into the land comprising present-day Venice... The majority of the land was subdivided as part of the Golden Bay tract, which was recorded in May 1902. The land to the south, extending from Brooks Court down to Westminster Court, was also subdivided by Kinney, Fraser, Gage, and Jones as the Country Club tract, recorded in April 1903...

...Further inland, to the east of Main Street, development occurred in a piecemeal fashion. Individual developers purchased blocks of land from larger tracts, such as the Santa Fe and Ocean Tracts, and subdivided them into smaller parcels which were more suitable for residential development. In this way, developers were able to capitalize on the area's proximity to nearby Ocean Park amenities. Notable inland residential subdivisions included the Ocean Park Villa Tract and the Ocean Park Villa Tract No. 2, both of which were developed in 1903 near the Ocean Park Country Club. Retired banker

and real estate developer E.J. Vawter also purchased a block of land which he developed as a botanical estate dedicated to the cultivation of carnations. The property's prior use was commemorated when Vawter later subdivided the land for residential development as the Carnation Tract.

By 1904, Kinney found himself at odds with his partners. Among other matters, the four men disagreed on how the unincorporated wetlands comprising the southern portion of their holdings should be developed. Abbot Kinney believed that to successfully develop the unincorporated area, it would be necessary to create an independent municipality south of Marine Street. The four men decided to dissolve their partnership and go their separate ways; Kinney won a coin toss employed to divide up the company's assets and selected the southern portion of the tract. Several months later, those residents living south of Marine Street, in the unincorporated portion of the Ocean Park development, voted to establish the separate city of Ocean Park. It was within this community that Abbot Kinney created his most successful development, Venice of America...

...In 1905, a subdivision map was recorded for the Venice of America tract which reflected Abbot Kinney's initial plans for his new development. The plan for the tract was comprehensive and included areas dedicated to recreational, commercial, and residential properties. At the beach, a 1,400-foot pier was constructed. Included among its various attractions were an auditorium, a dance hall, and a nautical-themed restaurant that resembled a ship. A hot saltwater plunge was situated on the beach just north of the pier; in 1908 the plunge was expanded to become the Venice Surf Bathhouse. A boardwalk was planned along present-day Ocean Front Walk, which was noted on Kinney's presentation map as the "Pacific Promenade." Windward Avenue, which extended from the beach to the Bathing Lake and canals further east, was intended to serve as the primary commercial corridor. Visitors and tourists arriving in Venice via streetcar disembarked at Windward, which provided their first glimpse of Abbot Kinney's "Venice-of-America." As a result, Windward Avenue played an important role in establishing the character of Kinney's development in Venice.

In an effort to create a cohesive aesthetic in keeping with his vision for the resort town, Kinney stipulated that all building exteriors in the Venice business district be constructed "in harmony with the 'Venetian Renaissance' style." He commissioned architects Norman Marsh and Clarence Russell to design the principal buildings for Venice; the two men modeled their designs after Italy's Piazza San Marco, whose buildings featured enclosed colonnaded walkways. In keeping with Kinney's vision for a town which resembled the Italian original, the residential area of Venice—known as the "canal district"—was distinguished by a network of man-made saltwater canals. The lateral canals in the residential area led to the Grand Canal, which emptied directly into the sea. As much of the land on which Venice was constructed was situated below sea level, the canal waters were controlled by the rising and falling of ocean tides, which flushed the waterways. Distinctive arched footbridges, designed by Italian metal sculptor Felix Peano, spanned the canals and connected the four islands of residential lots. In anticipation of the influx of visitors which would likely vastly exceed the available accommodations, land had also been set aside south of the Grand Canal for the erection of a tent city, where rustic "cottages with canvas sides"—or as Kinney noted on his presentation map, "Venetian Villas"—could be rented for overnight stays...

...Although the canals were still under construction, Venice of America officially opened to the public on July 4, 1905. By this time, several key commercial buildings had been completed, including the Bank of Venice at the intersection of Windward and Pacific avenues. Early buildings were designed in the Mediterranean Revival style, reflecting Kinney's mandate, and featured elaborate arcades which extended along the north side of Windward Avenue from Ocean Front Walk to Pacific Avenue. The Mediterranean Revival style continued to be employed for new construction through the early 1920s; however, by the end of the decade, examples of commercial vernacular buildings were introduced to the district...

...Following a successful opening season, in 1906 Abbot Kinney began to expand the city services in Venice. Construction commenced on a city hall (now designated a City Historic-Cultural Monument) and a fire station, which was designed by John Gabrovck and completed that same year. An Edison Electric Company facility was later constructed in 1910...

...By 1907, the Venice of America development had become the nexus of the city of Ocean Park. In fact, the area's success and its potentially negative impact on the surrounding business developments of Ocean Park was keenly felt by Ocean Park businessmen, sparking resentment and discord. It was these "conflicting business interests," as Jeffrey Stanton describes, that triggered a feud between the two entities. "The basic problem," Stanton observes, "was that two rival communities were growing up in one municipality."

After months of real estate and political battles, Abbot Kinney launched a campaign to "disincorporate" Venice of America from the surrounding community of Ocean Park. While community sentiment within Venice of America was clearly in Kinney's favor, his efforts failed to muster the two-thirds majority required to prevail in the public election. Venice of America remained a part of the Ocean Park community; in 1911, the entire community was renamed Venice...

...While business development may have been controversial, residential developers in surrounding areas of Ocean Park began to devise ways to capitalize on the resort's success. Soon, a second set of six canals appeared just to the south of Venice of America. Developed by the Short Line Beach Company in 1905-1906, the subdivision was known as the Venice Canal Subdivision. The Short Line Beach Company continued to divide land further south down the peninsula, as did the Los Angeles Pacific Railroad Company and Kinney's former business partners. The Silver Strand tract, developed by Alexander Fraser, Henry Gage, and George Merritt Jones in 1905, featured lots oriented around a Grand Canal spanned by bridges... Although the peninsula was originally subdivided by several different developers, the streets were later renamed in 1964 to reflect a nautical theme; east-west streets along the peninsula are arranged alphabetically from north to south...

The project area reflects this later period of development and subdivision. Although there may have been some residential development in the vicinity of the project area previous to 1964, the earliest building is the Venice Pumping Plant, which dates from the late 1950s. Residential development is spotty, beginning in the mid-1960s and continuing on through 2000.

3.4.2.5 Identification and Evaluation of Cultural Resources

Methodology

Archaeological Resources

The study area was defined as those parcels that would encompass all project components (see Figure 2-2, Project Location Map, in Chapter 2 [Project Description] of this EIR), including temporary construction activities. In order to identify and evaluate archaeological resources, a records search and pedestrian field survey were conducted. Additional background research was conducted to establish the context and setting of the project area.

Tribal Cultural Resources

NAHC was contacted on November 2, 2015 with a request for a Sacred Lands File search and a list of Native American contacts for the area. Once this list was received, the City contacted by letter or e-mail the groups on the NAHC list and a City-maintained list. A total of two replies were received, from the Gabrieleño Band of Mission Indians – Kizh Nation and the Fernandeño Tataviam Band.

Historical Resources

The study area was defined as those parcels immediately adjacent to the Project Site described in the project description (see Figure 2-2, Project Location Map, in Chapter 2 [Project Description] of this EIR) and would encompass all project components, including temporary construction activities. The study area includes residential properties on Canal Court, Hurricane Street, Marquesas Way, and Via Dolce, and encompasses a section of the Venice Grand Canal.

In order to identify and evaluate historical resources, a multi-step methodology was utilized. Record searches for previous documentation of identified historic resources were conducted, including listings in the NRHP, determinations of eligibility for NRHP listings, and the City of Los Angeles' historic resource inventories. An intensive survey, including photography and background research, was then made of the study area. Additional background and site-specific research was conducted in order to evaluate the properties within their historic context. CRHR and City of Los Angeles criteria were employed to assess the significance of the properties.

Survey Results

The records search included a review of all available archaeological and historical resources reports and site records concerning properties directly bordering the entire project area and a 0.5-mile surrounding record search area. Two studies were previously conducted within portions of the project area. No archaeological sites have been previously recorded within the boundaries of the project area; one City of Los Angeles HCM is present in the project area, the Venice Canal System, HCM #270; and furthermore, there no TCR's are on the site. Two historic cultural resources are encompassed in the 0.5-mile buffer area—the Venice Canal Historic District and the Warren Wilson Beach House.

The cultural resources survey process undertaken for the Proposed Project was conducted per SHPO instructions, which gives a 45-year threshold for surveying properties for significance. Those properties that were of post-1970 construction (under 45 years of age) were not documented unless they potentially exhibited “exceptional” importance.¹

Archaeological Resources

A records search was conducted on September 1, 2015, at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. SCCIC is a branch of the California Historical Resources Information Center, which maintains California's official records of previously recorded cultural resource studies and recorded archaeological sites for Ventura, Los Angeles, Orange, and San Bernardino Counties. The SCCIC records search included the project area and a 0.5-mile buffer.

No archaeological resources are recorded in the project area.

A review of SCCIC's records indicates that 15 previous cultural resource studies have been conducted within a 0.5-mile radius of the project. Of these, two studies are included the project area; for those studies, no resources were recorded within the project area boundaries. Most studies observed no prehistoric or historic archaeological resources or isolated artifacts. Moreover, the 13 studies within the 0.5-mile buffer area produced positive results for just two cultural resources. However, the search indicated that no prehistoric archaeological sites are included on the Archaeological Determination of Eligibility list.

A comprehensive archaeological pedestrian survey of the project footprint was conducted on August 20, 2015. This area was surveyed in order to inspect for and identify any previously undiscovered cultural resources. The pedestrian survey consisted of walking transects 3 meters (10 feet) apart in an east/west orientation. Ground surface visibility was fair with the surface somewhat obscured by vegetation, resulting in approximately 80% surface visibility. No archaeological resources were identified during the field survey.

¹ As defined in the National Register Bulletin, p. 42 (Criterion Consideration G: Properties That Have Achieved Significance within the Past Fifty Years).

Tribal Cultural Resources

NAHC reviewed its Sacred Lands File and indicated in a letter sent to ICF International (ICF) on November 3, 2015 that there were Native American resources recorded in the area. However, the site numbers provided were all for sites in Ballona Wetlands, not the project area. NAHC recommended contacting six Native American groups in the area. The City contacted by letter or e-mail nine groups from contacts on the NAHC list and a City-maintained list.

Groups contacted are listed below.

- Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair, Cultural Resources
- Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Administrator
- Fernandño Tataviam Band of Mission Indians
Rudy Ortega Jr., President
- Gabrieleño Band of Mission Indians – Kizh Nation
Andrew Salas, Chairperson
- Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
- Gabrielino/Tongva Nation
Sam Dunlap, Cultural Resources Director
- Gabrielino/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
- San Fernando Band of Mission Indians
John Valenzuela, Chairperson
- Soboba Band of Luiseño Indians
Joseph Ontiveros, Cultural Resource Director

The Gabrieleño Band of Mission Indians – Kizh Nation replied on November 30, 2015, stating that the area is sensitive and in the location of a village known to have existed in Ballona Wetlands. Native American monitoring was recommended for the project; no evidence was provided that the Project Site itself is within a TCR.

A response was received from the Fernandño Tataviam Band on December 1, 2015 stating that the project area was outside of Tataviam territory, and that the Band did not wish to consult on the project. The Soboba Band replied on December 21, 2015. No specific concerns about the project were raised.

Historical Resources

Within the study area, there are no NRHP-listed properties, no buildings were determined eligible for listing in the NRHP or the CRHR, and one property is listed as a HCM. As previously stated, properties listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The Venice Canal System, HCM #270, was designated on July 15, 1983; the Grand Canal is included as part of this historical resource. The Venice Canal System was designated as an HCM for its association with “an historic personage,” specifically, as the creation of developer Abbot Kinney. Therefore, the Venice Canal System is important as an achievement of Kinney; it is not eligible as an HCM for reflecting the broad cultural, economic, or social history of the nation, state, or community; for embodying characteristics of an architectural type specimen inherently valuable for a study of a period, style, or method of construction; or for being a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

While portions of the Grand Canal north of Washington Street are associated with the NRHP-listed Venice Canal District, the portion of the Grand Canal within the study area is not within the NRHP-listed historic district boundaries and was intentionally omitted when the district was nominated to the NRHP in 1980.

Of the six parcels immediately adjacent to the Project Site, only two contain any buildings or structures that were constructed prior to 1970. Please see Table 3.4-1 below for a list of properties in the study area.

Table 3.4-1: Properties in the Study Area

APN	Street Address	Date of Construction
4225008009	3809 S. Esplanade (3809 Gran Corso), Los Angeles, CA 90292	1977
4225008036	129 Hurricane Street, Los Angeles, CA 90292	1992
4225010017	120 Hurricane Street, Los Angeles, CA 90292	1968
4225010900	140 E. Hurricane Street (134 E. Hurricane, 3901 S. Esplanade), Los Angeles, CA 90292	Circa 1956–60 (1957)
4225013157	3811 Via Dolce, Los Angeles, CA 90292	1989
4225013152	3815 S. Via Dolce, Los Angeles, CA 90292	2000

Building dates were acquired using the Zoning Information and Map Access System, additional information available at City of Los Angeles Department of Building and Safety online (<http://ladbs.org/LADBSWeb/online-building-records.jsf>), and at City of Los Angeles Office of Historical Resources.

Two buildings meet the age criteria, neither one of which has previously been evaluated for eligibility to the Los Angeles HCM list, CRHR, or NRHP. In researching the history of the development of this community, the Historic Resources Survey Report for the Venice Community Plan Area, prepared as part of the SurveyLA process undertaken by the City of Los Angeles Department of City Planning’s Office of Historic Resources, was consulted. Additional research was conducted in January and February 2015 at HistoricPlacesLA.com, the Los Angeles Public Library online research databases, including its Photo Collection, the Department of Water & Power Photo Archive, and the California Index.

120 Hurricane Street was constructed in 1968. It is a two-story, multi-family residence that was designed in a Contemporary style with some fanciful decorative balcony entablature. It has a stucco exterior and a flat roof, and the open bay garage is located on the first story of the primary façade. The primary façade faces north onto Hurricane Street. Above the bay openings are two concrete balconies with metal balustrades, metal posts, and arched openings. Between the balconies is a

single roundel window. The south elevation overlooks the Ballona Wetlands and the associated pedestrian walkway. The second story of the south elevation has a cantilevered balcony with the same balustrade design as the north elevation. The balcony shelters a first-floor patio area. There is a wood picket fence surrounding the small backyard. Most of the visible windows appear to be original, multi-pane metal sash. There have been some replacement windows, including sliding doors to the balconies.



**Looking southwest at 120 Hurricane Street, from the corner of Canal Court and Hurricane Street.
Photo taken on August 19, 2015 (ICF).**

This property likely retains integrity from the original period of construction; however, it does not embody the distinctive characteristics of a type, period, or method of construction. The Contemporary style of this property is common to both the area and the era, and the arched openings of the balconies do not indicate the work of a master or the presence of high artistic value. Research did not indicate that this individual property has an association with any persons or events that are important or have made significant contributions to the broad patterns of local or regional history. Therefore, 120 Hurricane Street is not eligible for the CRHR under Criteria A, B, or C.

The Venice Pumping Plant is surrounded by a 6-foot high wall with a concrete base and metal siding perched on top, portions of which were constructed in 2013. Located in the residential neighborhood within the Ballona Lagoon West subarea of Venice, the building is surrounded on two sides by water. On the east is the Grand Canal and on the south is the Ballona Wetlands. The property wall abuts the pedestrian sidewalk that separates the property from the water. An original building permit was not located during the research phase; other sources have indicated a general building period between 1956 and 1960, while the project description (see Chapter 2) states that it was constructed in 1957. The industrial building is two stories, with a smooth concrete exterior that

is bare of decoration save horizontal grooves approximately 4 feet apart. It has an irregular footprint. The property itself houses a control facility, five pumps, a control center, emergency generators, and other associated equipment. This property was most recently upgraded in 1987.



Looking northwest at 140 Hurricane Street: Venice Pumping Plant. View from Via Dolce. Photo taken on August 19, 2015 (ICF).

No original photographs of the property were located during the research phase and, therefore, it is not clear how much integrity remains from the original period of construction. Many industrial civic buildings, such as pumping plants and switching stations, were designed in popular architectural styles in Los Angeles between the 1910s and the 1950s, but there is no indication that the Venice Pumping Plant's architecture style was specifically associated with its type or period of construction. Although this is considered to be the largest of the City's pumping plants, no written documentation that discusses the importance of its size and/or location was discovered during the research phase. There is no indication that this property was designed specifically to relate to its location, or to reflect its particular use. It is unknown who designed or engineered this property, except that it was constructed by the Department of Public Works. Research did not indicate that this individual property has an association with any persons or events that are important or have made significant contributions to the broad patterns of local or regional history. Therefore, the Venice Pumping Plant is not eligible for the CRHR under Criteria A, B, or C.

3.4.3 Environmental Impact Analysis

This section outlines the methodology, evaluation, and impacts for archaeological and historical resources. It is intended to assist in the evaluation and conclusions of the impact analysis provided below and in the formation of required mitigation measures.

3.4.3.1 Screening Analysis

As noted in Section Chapter 1.0, Introduction, the analysis and conclusions contained in the Initial Study (see Appendix A [Notice of Preparation/Initial Study] of this EIR) prepared for the Proposed Project considered and then eliminated a number of impacts from further analysis, including those contained in CEQA Appendix G and the *L.A. CEQA Thresholds Guide* (2006). Therefore, only those impacts and corresponding thresholds of significance noted below were determined to require further analysis and are addressed in this EIR.

3.4.3.2 Thresholds of Significance

City of Los Angeles CEQA Thresholds Guide

The 2006 *L.A. CEQA Thresholds Guide* states that the following impact significance factors shall apply to archaeological and historical resources.

Archaeological Resources

The project would have a significant impact on archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information that is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100 years old and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

Historical Resources

The project would have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource that does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

CEQA Appendix G

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact related to cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- Disturb any human remains, including those interred outside of formal cemeteries.

Tribal Cultural Resources

The project would have a significant impact related to TCRs if it would:

- Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California Register of Historical Resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource.

3.4.3.3 Construction Impacts

The analysis below describes the temporary and permanent impacts on cultural resources as a result of the Proposed Project during construction.

Archaeological Resources

CUL-1. Would the project disturb, damage, or degrade an archaeological resource or its setting, or otherwise cause a substantial adverse change in the significance of an archaeological resource?

No archaeological resources have been recorded in the project area. A survey of the project area located no archaeological resources. Research determined that this area was marshland and beach dunes adjacent to the outlet of Ballona Creek at the Pacific Ocean prior to modern development; this setting is unlikely to have preserved prehistoric archaeological resources due to constant erosion and deposition. These marshland and beach dune sediments have been substantially altered by twentieth century development, as the project area has been leveled and filled to create part of the community of Venice and the associated canals. Based on the setting and the level of previous disturbance, the potential for construction activities to disturb, damage, or degrade an archaeological resource or its setting is low. However, in the unlikely event that previously undisturbed archaeological resources are encountered during construction, impacts to these resources could be significant. With implementation of Mitigation Measure MM-CUL-1, which requires stopping work and treating any cultural resources that are discovered, impacts to archaeological resources would be reduced to **less than significant with mitigation**.

CUL-2. Would the project disturb any human remains, including those interred outside of formal cemeteries?

No human remains are known to exist in the project area, and the location does not encompass any formal cemeteries. Because the Project Site is situated on beach sands and marshland clays, there is a very low potential for prehistoric human remains to be present. While the uncovering of human

remains is not anticipated, if they are discovered, HSC Section 7050.5 requires that further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the county coroner be contacted. Pursuant to PRC Section 5097.98, if the remains are thought to be Native American, the coroner shall notify NAHC, who shall then notify the Most Likely Descendant. Further provisions of PRC Section 5097.98 are to be followed as applicable.

Therefore, through compliance with existing regulations, impacts on human remains due to construction of the Proposed Project would be **less than significant** and no mitigation measures are required.

Historical Resources

CUL-3. Would the project result in a substantial adverse change in the significance of a historical resource due to demolition, relocation, conversion, rehabilitation, or alteration of a historical resource?

The Proposed Project includes the construction of a permanent submerged diversion structure that would connect the Coastal Interceptor Sewer, located in the Grand Canal, to the proposed VAPP. A temporary cofferdam in the Grand Canal would need to be constructed in order to make this connection. The Grand Canal, which is the only historical resource in the study area, meets HCM criteria for designation for its association with Abbot Kinney and the development of the “Venice of America.” Although a coffer dam would be situated in the Grand Canal during the construction phase of the Proposed Project, it would not result in a substantial adverse change in the significance of this historical resource. The Grand Canal is significant for its association with Abbot Kinney, and this association would not be affected by the temporary submersion of a structure in the Canal itself. The temporary cofferdam would not remain in the water following construction of the diversion structure, which would be completely submerged below the bottom of the Grand Canal. Therefore, impacts during construction would be **less than significant** and no mitigation measures are required.

Tribal Cultural Resources

CUL-4. Would the project cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California Register of Historical Resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?

TCR consultations were completed. No responses received from Native American groups suggest there are TCRs in the project footprint. No sites or other resources are known in the immediate project area that could be categorized as TCRs. The lack of known TCRs and the low potential for discovery of such resources indicates that construction would not affect TCRs and cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

No TCRs containing human remains and no human remains in general are known to exist in the project area, and the location does not encompass any formal cemeteries. Because the Project Site is situated on beach sands and marshland clays, there is a very low potential for prehistoric human remains to be present. While the uncovering of human remains is not anticipated, if they are discovered, HSC Section 7050.5 requires that further disturbances and activities shall cease in any

area or nearby area suspected to overlie remains, and the county coroner be contacted. Pursuant to PRC Section 5097.98, if the remains are thought to be Native American, the coroner shall notify NAHC, who shall then notify the Most Likely Descendant. Further provisions of PRC Section 5097.98 are to be followed as applicable. Therefore, through compliance with existing regulations, construction impacts on any TCRs containing human remains would be **less than significant** and no mitigation measures are required.

3.4.3.4 Operational Impacts

The analysis below describes the temporary and permanent impacts on cultural resources anticipated as a result of the Proposed Project during operation. The analysis below evaluates potential impacts, based upon the applicable threshold of significance.

Archaeological Resources

CUL-1. Would the project disturb, damage, or degrade an archaeological resource or its setting, or otherwise cause a substantial adverse change in the significance of an archaeological resource?

Operation of the project would not involve any ground-disturbing activities. Therefore, there would be no potential to disturb, damage, or degrade an archaeological resource or its setting. **No operational impacts** on archeological resources would occur and no mitigation measures are required.

CUL-2. Would the project disturb any human remains, including those interred outside of formal cemeteries?

No human remains are known to exist in the project area, and the location does not encompass any formal cemeteries. Because the Project Site is situated on beach sands and marshland clays, there is a very low potential for prehistoric human remains to be present. As a consequence and because operation of the project would not involve any ground-disturbing activities, **no operational impacts** on human remains would occur and no mitigation measures are required.

Historical Resources

CUL-3. Would the project result in a substantial adverse change in the significance of a historical resource due to demolition, relocation, conversion, rehabilitation, or alteration of a historical resource?

The only historical resource in the study area is the Grand Canal, which meets the HCM criteria for designation for its association with Abbot Kinney and the development of the "Venice of America." Once constructed, the diversion structure within the Grand Canal would be located below grade and would not protrude within the water column. Operation of the Proposed Project would not involve activities that could result in the demolition, relocation, conversion, rehabilitation, or alteration of the Grand Canal. Therefore, **no impacts** during operation would occur and no mitigation measures are required.

Tribal Cultural Resources

CUL-4. Would the project cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California Register of Historical Resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?

As noted above, no responses that have been received from Native American groups suggest there are TCRs in the project footprint. No sites or other resources are known in the immediate project area that could be categorized as TCRs. Additionally, operation of the project would not involve ground disturbing activities; therefore, operation of the project would not disturb prehistoric human remains. Therefore, the project is **not likely to cause a substantial adverse change** in the significance of a TCR and no mitigation measures are required.

3.4.4 Mitigation Measures

The following mitigation measure was developed to avoid or minimize the Proposed Project's potential impacts on cultural resources.

MM-CUL-1: Unanticipated Archaeological and/or Tribal Cultural Resource Discoveries

In the unlikely event that any prehistoric artifact of historic period materials or bone, shell, or nonnative stone is encountered during construction, work shall be immediately stopped, the area secured, and work relocated to another area until the found materials can be assessed by a qualified archaeologist. Examples of such cultural materials might include historical trash pits containing bottles and/or ceramics; or structural remains or concentrations of grinding stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; and flakes of stone not consistent with the immediate geology such as obsidian or fused shale. If the Archeologist determines that an artifact may qualify as a tribal cultural resource, a Native American monitor shall be consulted. The contractor shall stop construction within 30 feet of the exposure of these finds until a qualified archaeologist can be retained to evaluate the find (see 36 CFR 800.11.1, 14 CCR 15064.5(f) and PRC § 21084.3(b)). If the resources are found to be significant, they shall be avoided or impacts shall be mitigated consistent with Section 106, State Historic Preservation Officer Guidelines, and/or Assembly Bill 52.

3.4.5 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on archaeological, historical or tribal cultural resources would occur.

3.4.6 Cumulative Impacts

3.4.6.1 Archaeological Resources

The Proposed Project would result in no operational impacts on archaeological resources. Based on the setting and the level of previous disturbance, the potential for construction activities to disturb, damage, or degrade an archaeological resource or its setting is low. Additionally, if archaeological resources are encountered, Mitigation Measure MM-CUL-1 would reduce potential project-related

construction impacts to less than significant. The incremental effects of the Proposed Project, after mitigation, would not contribute to a significant adverse cumulative impact on archaeological resources.

3.4.6.2 Tribal Cultural Resources

The Proposed Project would have no impacts on TCRs, because no such resources are present within the project footprint, based on information received to date. Therefore, the project would not contribute to a significant adverse cumulative impact on TCRs.

3.4.6.3 Historical Resources

The only potential impacts to a historical resource (the Grand Canal) would occur during construction and those impacts would be less than significant. Consequently the study area for cumulative impacts would encompass other projects in the area that could affect the canal. Based upon a review of projects contained within Table 1-1, Related Projects List (see Chapter 1, Introduction of this EIR), none of the projects listed, including the Venice Dual Force Main would (which would be constructed underneath the Grand Canal [at Esplanade and Hurricane Street]) would result in significant cumulative effects on the Grand Canal. Similarly, the Proposed Project would also not result in significant cumulative effects on the Grand Canal.