3.5 Cultural Resources

This section addresses the potential impacts to cultural resources associated with implementation of the proposed Project. Historical resources under CEQA include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section includes: a summary of applicable regulations related to cultural resources; a description of existing cultural resources in the proposed Project area; and an evaluation of the potential impacts of the proposed Project related to cultural resources in and around the proposed Project area. The Project includes the following Project Design Features (PDFs), PDF-CR-1: Archaeological Resource Discovery During Construction, and PDF-CR-2: Human Remains Discovery During Construction. With implementation of Mitigation Measures CR-1: Archaeological Monitoring, CR-2: Archaeological Resources Sensitivity Training, CR-3: Discovery of Archaeological Resources, and CR-4: Archeological Monitoring Reports, and NOISE-5: Equipment Setbacks, impacts to cultural resources are less than significant.

The analysis of historical resources and impacts analysis is based on four reports, listed below:

- Environmental Science Associates, Silver Lake Reservoir Complex Master Plan: Supplemental Historical Report and Impacts Analysis (2022) (Historical Report). This Historical Report is provided within Appendix F of this Draft EIR.
- GPA Consulting, Silver Lake Reservoir Complex Master Plan, Secretary of the Interior’s Standards for the Treatment of Historic Properties Analysis Memorandum (2020). This report is provided within Appendix F.
- GPA Consulting, Silver Lake Reservoir Complex Master Plan: Research & Analysis, Historical Resources (2019). This report is provided within Appendix F.
- Greenwood & Associates, Cultural Resources Assessment Report: Silver Lake Reservoir Complex Storage Replacement Project (2004). This report is provided within Appendix F.

The analysis of archaeological resources is based on the Silver Lake Reservoir Complex Master Plan Project, Archaeological Resources Assessment Report prepared by ESA in February 2022. The Archaeological Resources Report are provided within Confidential Appendix E of this Draft EIR.

3.5.1 Environmental Setting

This section provides an overview of the ethnographic, pre-contact archaeological, and historic-age setting of the project area.

Archaeological Setting

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is
manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 cal B.C. (Byrd and Raab 2007). During the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the climate of Southern California became warmer and more arid and the human populations, who were represented by small hunter gathers until this point and resided mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab 2007).

During the Late Holocene (1,650 cal B.C. to cal A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred (Erlandson 1994; Wallace 1955; Warren 1968). The native populations of Southern California were becoming less mobile, and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources (Erlandson 1994). Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab 2007).

Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly (MCA) (Jones et al. 1999). While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources.

Given the increasing sedentism and growing populations during the Late Holocene, territorial conscription and competition became acute. Primary settlements or village sites were typically established in areas with available freshwater, and where two or more ecological zones intersected (McCawley 1996). This strategic placement of living space provided a degree of security in that when subsistence resources associated with one ecological zone failed, the resources of another could be exploited (McCawley 1996). Villages typically claimed and carefully defended fixed territories that may have averaged 30-square miles in size encompassing a variety of ecological zones that could be exploited for subsistence resources (McCawley 1996).

The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (Pimu or Pimugna) and coastal Southern California to the Great Basin. Major technological changes appeared as well, particularly with the advent of the bow and arrow sometime after cal A.D. 500, which largely replaced the use of the dart and atlatl (Byrd and Raab 2007).

**Ethnographic Setting**

The Project site is located in a region traditionally occupied by one Native American group; the Gabrielino (including the Tongva and Kizh). The terms Tongva, Kizh are preferred by many
descendant groups over the Spanish words that have historically been used to describe them. The group is described below.

The main sources of historical information on the Gabrielino (Tongva and Kizh) include Hugo Reid (see Heizer 1968), Zephyrin Engelhardt, Alfred Kroeber, John P. Harrington, Bernice E. Johnston, Thomas C. Blackburn, and C. Hart Merriam. In 1978, the Smithsonian Institution compiled the Handbook of North American Indians – a 20-volume encyclopedia summarizing the work of previous ethnographers and what was known about the prehistory, history, and culture of indigenous North American groups. Volume 8: California serves as the primary source material for the information presented in this section. Where possible, this information has been supplemented with information gleaned from other published sources (such as McCawley 1996, and O’Neil and Evans, 1980). The following summaries are not intended to provide a comprehensive account of these groups but are instead brief historical overviews based on available information. However, tribes are the authority on their cultural history.

It should be noted that the information presented herein is related to living tribes who still reside in Los Angeles and Orange counties and who maintain a vested interest in their history, culture, practices, customs, and beliefs. Currently, there are five Gabrielino (Tongva and Kizh) groups that are recognized by the State as California Native American Tribes (as indicated by the California Native American Heritage Commission [NAHC]): Gabrieleño Band of Mission Indians – Kizh Nation; Gabrieleno Tongva Indians of California Tribal Council; Gabrieleno-Tongva San Gabriel Band of Mission Indians; Gabrieleno-Tongva Tribe; Gabrieleno/Tongva Nation. These tribes are living communities who actively participate in the preservation of their culture and tribal resources.

Gabrielino (or Tongva and Kizh)

The term “Gabrielino” is a general term that refers to those Native Americans who were sent by the Spanish to the Mission San Gabriel Arcángel. The term first appears, spelled Gabrieleños, in an 1876 report by Oscar Loew (Bean and Smith 1978). Two indigenous terms are commonly used by tribal groups to refer to themselves and are preferred by descendant groups: Tongva and Kizh. The term Tongva was recorded by ethnographer C. Hart Merriam in 1903 (Heizer 1968). The term Kizh was first published by ethnologist Horatio Hale in 1846 (Heizer 1968). Since there are two terms that are used by different groups to refer to themselves, the term Gabrielino is used in this section to encompass both Tongva and Kizh groups.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith 1978). The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leaved cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The
Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber 1925).

The exact location of Yangna, within downtown Los Angeles continues to be debated, although some believe it to have been located at the present-day location of the Civic Center (McCawley 1996). Other proposed locations are near the present-day Union Station (Chartkoff and Chartkoff 1972:64), to the south of the old Spanish Plaza, and near the original site of the Bella Union Hotel located on the 300 Block of North Main Street (Robinson 1963:83, as cited in Dillon 1994:30). Dillon (1994:30) hypothesizes that the Union Station location is an unlikely spot for a large village or habitation, as it lies within the annual Los Angeles River flood zone. Local sources such as the Echo Park Historical Society, report that when Gaspar de Portola and Father Juan Crespi camped on the riverbank opposite the North Broadway Bridge entrance to Elysian Park, they were served refreshments by Yangna Indian villagers from the current location of the Los Angeles Police Academy (Echo Park Historical Society 2008). The Los Angeles Police Academy is located in the northern portion of Elysian Park, which appears an unlikely location for the Native American Village of Yangna because this location is more consistent with the location of the village of Maawnga, which was reported to have been originally located within the Rancho de los Feliz. This rancho originally encompassed Griffith Park and extended south to the northern portion of Elysian Park. The village of Maawnga, also recorded as Maungna, is believed to have been located “high on a bluff overlooking Glendale Narrows in the hills now occupied by Elysian Park” (Gumprecht 2001:31).

A third community or village, named Geveronga, may have been located in the vicinity of the current downtown Los Angeles’ city center, reported in the San Gabriel baptismal records as located “in the rancheria adjoining the Pueblo of Los Angeles” (McCawley 1996:57).

**Historic Setting**

The Gabrielino were virtually ignored between the time of Cabrillo’s visit and the Spanish Period, which began in 1769 when Gaspar de Portolá and a small Spanish contingent began their exploratory journey along the California coast from San Diego to Monterey. Passing through the Los Angeles area, they reached the San Gabriel Valley on August 2 and traveled west through a pass between two hills where they encountered the Los Angeles River and camped on its east bank near the present-day North Broadway Bridge and the entrance to Elysian Park (approximately 1.75 miles southeast of the proposed Project). This location has been designated California Historic Landmark Number 655, the Portolá Trail Campsite. Father Crespi (a member of Portolá’s party) indicated in his diaries that on that day they “entered a spacious valley, well grown with cottonwoods and alders, among which ran a beautiful river. This plain where the river runs is very extensive and...is the most suitable site for a large settlement” (The River Project 2001). He goes on to describe this “green, lush valley”; its “very full flowing, wide river”; the “riot of color” in the hills; and the abundance of native grapevines, wild roses, grizzly, antelope, quail and steelhead trout. Crespi observed that the soil was rich and “capable of supporting every kind of grain and fruit which may be planted.” The river was named **El Rio y Valle de Nuestra Señora La Reina de Los Ángeles de la Porciúncula**.
On September 4, 1781, which was 12 years after Crespi’s initial visit, the *Pueblo de la Reina de los Ángeles* was established not far from the site where Portolá and his men camped. Watered by the river’s ample flow and the area’s rich soils, the original pueblo occupied 28 square miles and consisted of a central square, surrounded by 12 houses, and a series of 36 agricultural fields occupying 250 acres, plotted to the east between the town and the river (Gumprecht 2001).

An irrigation system that would carry water from the river to the fields and the pueblo was the communities’ first priority and was constructed almost immediately. The main irrigation ditch, or *Zanja Madre*, was completed by the end of October 1781. It was constructed in the area of present-day Elysian Park and carried water south to the agricultural lands situated just east of the pueblo (Gumprecht 2001).

A constant struggle to bring water to the residents of the pueblo necessitated the construction of Echo Park Reservoir, the Silverlake Reservoir, and the further expansion of the *zanja* irrigation ditches. When these measures proved insufficient, a more permanent solution to Los Angeles’ water shortage was sought. Under the direction of City engineer William Mulholland, the Los Angeles Bureau of Water Works and Supply constructed the 238-mile-long Los Angeles Aqueduct. This 5-year project, completed in 1913, employed the labor of more than 5,000 men and brought millions of gallons of water into the San Fernando (now Van Norman) Reservoir (Gumprecht 2001). Now able to offer water and sewer service at a grand scale, many smaller cities were voluntarily incorporated by Los Angeles (Robinson 1979:244).

From 1920 to 1930, Los Angeles experienced another population explosion, along with the rise of automobile transportation and the development of the entertainment industry. All told, between 1890 and 1930, the population of Los Angeles increased from 50,000 to 1.2 million people (Wild 2005).

**Zanja Conduit System**

For the Pueblo of Los Angeles, the *zanjas*, or publicly owned irrigation ditches, sustained the area and enabled ranching and cultivation of the Los Angeles River’s fertile floodplains. The *zanjas* consisted of gravity-driven water conveyance systems, used for irrigation of lands at lower elevations from the water’s source. The main ditch – the *Zanja Madre* (Mother Ditch) - was constructed in 1781 and carried water from the Los Angeles River south to the agricultural lands surrounding the pueblo. As the pueblo grew and more water was diverted from the river, the supply began to dwindle. Initially, however, there was little worry about the future water needs of the City, and no regulation of the water distribution itself. Typically, farmers would dig their own ditches from the main ditches or from the river. Private water carriers hauled and sold water to households for domestic use (Gumprecht 2001).

Prominent engineers and surveyors George Hanson and George Solano and several others formed The Los Angeles Canal & Water Company in 1867 to provide water from the Los Angeles River to the City of Los Angeles. In return for the company's providing water to the City, the Los Angeles Canal & Water Company received an undivided one-third of the City's original land grant. The City regained control of 33 acres of the concession in 1891, and that 33-acre tract became the basis for Echo Park and the Echo Park Lake. The mapping of the Canal & Reservoir...
Ditch is approximate and further research provides more insight into the location. Also referred to as the Zanja Canal and Reservoir, the ditch was two miles in length (specifically 11,150 feet) and three feet wide on the bottom, eight feet wide on top and two- and one-half feet in depth. It fed Reservoir No. 4 (1.2-miles to the south of Silver Lake, now known as Echo Park Lake) from the Los Angeles River. It is likely that the mapping does not represent the full extent of the Canal which was a diversion from the Los Angeles River extending to Reservoir No. 4 (Hall 1888: 539-540). As described by Layne (1952: 24-25) the Canal extended from the west side of the river at Crystal Springs and ran through the base of the hills at Griffith and Elysian Parks, and then through the head of a pass where Glendale Boulevard crosses the river today at a point which was known as Division Point. The supply was then carried “southerly through a pass in the hills to the gulch which now holds Silver Lake Reservoir to a point below Berkeley Avenue and then into Reservoir No. 4” (Layne 1952:24).

**Historical Architectural Setting**

The neighborhood now known as Silver Lake first was subdivided into lots and put up for sale beginning in 1887, with the arrival of the railroad to Los Angeles and the ensuing real estate boom. The population continued to increase after the Pacific Electric railroad provided commuter access to the Silver Lake area from downtown Los Angeles in 1904. As a result, tracts were subdivided at this time on either side of Sunset Boulevard, which at the time was part of the streetcar line.\(^1\) Many of these early tracts featured public stairways for the residents to navigate the hilly landscape. Nine of these early staircases are still extant. Glendale and Los Angeles were connected in 1915 by the completion of Glendale Boulevard which encouraged further development in the Silver Lake area.\(^2\) The community is named for the Silver Lake Reservoir (Project site) that sits in the middle of the neighborhood. The reservoir was designed by William Mulholland in 1907 and named after Herman Silver, a City Councilman. The upper Reservoir is called the Ivanhoe Reservoir, named after the novel by Sir Walter Scott.\(^3\)

Actor Antonio Moreno and his wife, Daisy Canfield were two early residents of Silver Lake, and helped promote and develop the neighborhood. After building the Canfield-Moreno Estate in 1923, the adjacent land was subdivided and developed in 1926 and named “Moreno Highlands,” one of the largest tracts developed in Silver Lake.\(^4\) Construction proliferated rapidly and by 1930, there were 193 homes on the tract. Eight years later, in 1938, the number of homes had ballooned to 313 with plans for an additional 300 homes underway.\(^5\)

The rapid construction of single-family and multi-family residences was spurred by commuters who used the Sunset Boulevard streetcar line to commute to downtown Los Angeles for work. As automobile use became more widespread in the 1920s, corresponding infrastructure, such as

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\(^1\) *Historic Resources Survey Report: Silver Lake-Echo Park-Elysian Valley Community Plan Area, City of Los Angeles, 11.*


\(^4\) *Historic Resources Survey Report: Silver Lake-Echo Park-Elysian Valley Community Plan Area, City of Los Angeles, 11.*

nearby U.S. Highway 101, was constructed. Silver Lake reflected this trend toward private automobile travel versus public transportation and was an important hub of automobile-age architecture, including Streamline Moderne and Modern styles. Streamline Moderne and Modernist architects responded to the rise of the automobile and its attendant commercial development in Silver Lake and the City more broadly with designs intended to echo the horizontality of the new fast-paced, car-oriented culture. Many famous modern architects constructed buildings in Silver Lake, including Rudolph Schindler, Richard Neutra, Raphael Soriano, John Lautner, Gregory Ain, Harwell Hamilton Harris, and J.R. Davidson. Many of these avant-garde architects opened offices and made Silver Lake their home, including Richard Neutra, John Lautner, and A. E. Morris.6

During the period of residential development in the Silver Lake neighborhood, associated commercial, religious, and educational buildings were also constructed in the area. There was a small, automobile-oriented commercial district on Silver Lake Boulevard in the 1920s, which would later include several gas/service stations as automobile use became more popular. Most of the commercial development, however, was built along Glendale Boulevard, Sunset Boulevard, Rowena Avenue, and Hyperion Avenue.7

**Current Setting**

The proposed Project is in the Silver Lake neighborhood in the City of Los Angeles. The Silver Lake neighborhood is primarily residential in nature, with a handful of smaller commercial and recreational areas, including land adjacent to the SLRC that has been previously developed for public use. The Project area is defined by the outer boundary of the SLRC, including existing recreational facilities, but excluding the existing Los Angeles Department of Water and Power (LADWP) facilities. The proposed Project area would be bounded by Tesla Avenue on the north, Armstrong Avenue and Silver Lake Boulevard on the east, Van Pelt Place and Silver Lake Boulevard on the south, and West Silver Lake Drive on the west. Much of the Project area is zoned as Open Space (OS) and is contained within two Los Angeles civic jurisdictions, Council Districts 4 and 13.

The SLRC is located on a 127-acre site and includes two reservoirs, three dams, water and stormwater infrastructure, a variety of ancillary buildings and structures, interior thoroughfares, and public recreational facilities. The City of Los Angeles Recreation and Parks Department (RAP) currently operates and maintain approximately three acres within the SLRC, known as “The Meadow,” an open grassy area along the eastern side of the SLRC currently open to public access from dawn till dusk. Additionally, approximately four acres are owned and operated by RAP for the existing Silver Lake Recreation Center at the south end of SLRC. In the northeastern corner of the Project area is the Neighborhood Nursery School and associated playground. Currently, there are public pathways that run along the east and west sides of the reservoirs and along the top of Silver Lake Dam. Approximately four acres of existing paved surfaces around

6 Historic Resources Survey Report: Silver Lake-Echo Park-Elysian Valley Community Plan Area, City of Los Angeles, 12.

7 Ibid.
the reservoirs’ perimeters are available for shared public use with LADWP. The entire SLRC is enclosed by a perimeter chain-link fence varying in height from 6 to 12 feet.

Previously Identified Cultural Resources

For the purposes of this section, cultural resources are defined as physical evidence or a place of past human activity, including sites, objects, landscapes, or structures of significance to a group of people traditionally associated with it. Archaeological resources can be both pre-contact and historic-age and consist of cultural resources which are on the surface or in the subsurface. Historic resources are historic-age (i.e., 45 years old or older) buildings or structures that have been determined as significant and eligible for, or listed on, the National Register of Historic Places (National Register) and/or California Register of Historical Resources (California Register) and/or by the City of Los Angeles as Historic-Cultural Monument (HCM), or otherwise determined by the Project analysis or by the agencies discretion to be historical resources under CEQA.

Identified Historic Resources

The SLRC itself is a Los Angeles Historic Cultural Monument (#422), designated in 1989. The SLRC has also been previously recorded by SurveyLA with a status code of 5S1, meaning that it is a designated City landmark. The SLRC was reevaluated in 2004 by Greenwood & Associates as part of the Silver Lake Reservoir Complex Storage Replacement Project Environmental Impact Report and was recommended as eligible for listing as a historic district in the California Register of Historical Resources (California Register). The Status Codes recommended for the Silver Lake and Ivanhoe Reservoir Complex were 5S1, an individual property that is listed or designated locally, and 3CB, appears eligible both individually and as a contributor to a district for listing in the California Register through survey evaluation.

The SLRC is a multi-component historic district that is both the focal point and historic setting of the surrounding residential area. As such, the Project has the potential to impact historical resources in the immediate surroundings through changes to the historic setting. Archival research was conducted to identify previously recorded historic resources located within 0.25-miles of the perimeter of the Project site. Due to the density of the existing development in the area, a search for previously identified historical resources was limited to a 0.25-mile radius of the Project site (study area). This study area is where the Project has the greatest potential for indirect impacts to adversely affect the eligibility of nearby historical resources.

This research included a review of the National Register and its annual updates, the California Register, the Built Environment Resource Directory (BERD) database maintained by the State Office of Historic Preservation (OHP), the California Historic Resource Information System (CHRIS) at the South Central Coastal Information Center (SCCIC), and SurveyLA findings.

A records search for the Project was conducted on December 2, 2021, at the SCCIC housed at California State University, Fullerton. The records search included a review of all previously documented historic architectural resources and studies within a 0.5-mile radius of the Project site and archaeological resources within or immediately adjacent to the Project site. Although the SCCIC search uses a standard 0.50-mile radius for its search, the review of historical resources
3. Environmental Setting, Impact Analysis, and Mitigation Measures

3.5 Cultural Resources

surrounding the Project Sit is limited to 0.25-mile due to the size of the site and the density of the surrounding area. A review of documented resources in the project vicinity was conducted through the BERD on December 28, 2021. In addition, SurveyLA and the corresponding database HistoricPlacesLA were used to identify any previously recorded historical resources on the Project site or in the vicinity.

The records search resulted in a total of 650 previously recorded historic resources within a 0.25-mile radius of the perimeter of Project site, as well as two historic districts. The majority of these resources are contributors to the Silver Lake Residential Historic District, discussed below. A table containing all 650 identified resources is included in Appendix F. These resources included:

- 10 designated Los Angeles Historic Cultural Monuments (all are listed below, by repository)
- 3 resources listed on the National Register of Historic Places (One is the Garbutt Estate, discussed below; the other two, the VDL House and the Neutra Office Building, are also LAHCMs and are discussed below)
- 47 resources listed as potentially eligible at the City, State, and/or Federal level
- 9 public staircases recommended potentially eligible at the City level
- 7 resources identified as needing more research as they were not visible from the public right of way by SurveyLA
- 1 resource identified with status code 7R (“Identified in Reconnaissance Level Survey or in an Area of Potential Effect (APE): Not evaluated”)
- 1 resource identified with code 2D2 (“Contributor to a multi-component resource determined eligible for NR by consensus through Section 106 process. Listed in the CR.”). Note that this resource is the Silver Lake Recreation Building, part of the Project site.
- 2 historic districts: Silver Lake Residential Historic District and the Neutra Colony Residential Historic District, discussed below. The remaining resources are contributors to these districts.

Due to the high number of previously identified historic resources, only those resources that have views of the SLRC and consequently may experience an impact to their setting as a result of the proposed Project were analyzed for potential impacts. There are 103 previously recorded resources within 0.25-mile of the SLRC that have either direct or indirect views of the Project site. Direct views are defined as views of the open water from the resource's primary elevation from the public right-of-way. Indirect views are defined as watershed views that are partially obscured by other residences or foliage, or that have a direct view of the perimeter or parks around the complex but not of the water. These resources are broken down by repository below. A full table with all 103 resources is available in Appendix F.

**SCCIC**

The records search results indicate that 29 cultural resources studies have been conducted within a 0.50-mile radius of the Project site and 6 of which are located within the Project site. The entire Project site has been included in previous cultural resources assessments. The six reports
overlapping the Project site are: one (LA-02099) overlaps the west boundary; one LA-08254 intersects the northwest corner; one LA-12800 is on the west portion boundary, LA-05353 overlaps the eastern boundary, LA-09200 is located at the south end, and one (LA-13249) overlaps the south, west and east portions. Studies relevant to the current Project site (LA-2099 and LA-13249) and study area are described in further detail below. One study entitled, *Extent of Zanja Madre* (LA-13239) which includes maps depicting that a segment of the Zanja is located 0.10-mile from the Project site. The accompanying map to the record provided includes the entire Zanja conduit system in addition to the Zanja Madre. The segment close to the Project site is Canal and Reservoir Ditch. The map that this record is based on is from the 1880’s and not completely accurate. Additional map research was conducted in order to see if additional mapping could be found to correct any inaccuracies but was not publicly available.

The SCCIC search identified 15 cultural resources within 0.50-mile of the Project site. These included the Project site (Silver Lake Reservoir Complex Historic District; P-19-192627; 3CD; designated LAHCM). For the purposes of this historic report, only those resources located within 0.25-mile of the Project site are included below. There were four resources within 0.25-mile of the Project site. All four were also identified by SurveyLA and two were also recorded in the BERD. No prehistoric resources have been recorded within the Project site or within the 0.50-mile radius.

Two of these resources have views of the SLRC and are included in the impacts analysis:

- **Richard and Dion Neutra VDL Research House and Landscape** (2300 N Silver Lake Boulevard; P-19-188871): Designated LAHCM and is a National Historic Landmark with a status code of 5S1 and 1S. This resource has direct views of the Project site and is analyzed in the impacts analysis. Also identified in SurveyLA with status codes of 5S and 1S.

- **Landa Street-Redesdale Avenue Public Stairway**: This resource was assigned a code of 6Z from the SCCIC report, meaning it appears ineligible as a historical resource through survey evaluation. Through SurveyLA, however, the resource was assigned a status code of 5S3, meaning that it appears eligible for local designation. This resource has views of the Project site and is analyzed in the impacts analysis. The other two resources do not have views of the SLRC from the public right-of-way and are not included in the impacts analysis because they would not be impacted by the Project:

- **Neutra Office Building** (2379 N Glendale Boulevard; P-19-187000): Designated LAHCM and listed on the National Register with status code of 5S1 and 1S. This resource does not have views of the Project site and is not analyzed in the impacts analysis. It is far enough away from the SLRC that it would not experience impacts as a result of the Project. Identified in both BERD and SurveyLA.

- **Garbutt House** (1809 Apex Avenue; P-19-166820): Listed on the National Register with a status code of 1S. This resource does not have views of the Project site from the public right-of-way and is not analyzed in the impacts analysis. Identified in both BERD and SurveyLA.

**Built Environment Resources Database**

The BERD search resulted in seven previously recorded resources within 0.25-mile of the reservoir. Two of these resources were also recorded by SurveyLA and the SCCIC; three were also recorded in SurveyLA; and two were only recorded in the BERD. The two resources also
identified in the SCCIC search are the Neutra Office Building and the Garbutt House and are consequently not included in the below list as they are discussed above.

- **One resource**, 1850 Silver Lake Boulevard (P19-175302), has a status code of 2D, meaning that it is a contributor to a multi-component resource determined eligible for the National Register by the Keeper. This address is referring to the Silver Lake Recreation Center. This is not a contributor to the SLRC Historic District. Although this resource has been identified with a status code of 2D in a 1994 report, it is not individually listed in the California Register or the National Register, it is not an LA HCM nor is it a part of the SLRC Historic District. The correct status for this resource is 6Z: found ineligible for NR, CR or local designation through survey evaluation.

The remaining BERD resources are as follows. They do not have views of the SLRC and are located far enough away from the Project site that there would not be other project impacts such as construction noise and vibration. They are not included in the impacts analysis:

- **Tierman House** (2323 Micheltorena Street; P19-167080): Designated LAHCM with a status code of 5S1. This resource does not have views of the Project site and is not analyzed in the impacts analysis. It is located 822 feet west of the SLRC.

- **Lautner Residence** (2007 N Micheltorena Street; no associated Primary Number recorded): Status codes of 3CS, 5S3, 3S, meaning that it appears eligible for local, state, and federal listing based on survey evaluation. This resource does not have views of the Project site and is not analyzed in the impacts analysis. It is located 1,275 feet west of the SLRC.

- **2443 N Moreno Drive** (no associated Primary Number): A single-family residence identified also identified in SurveyLA. The BERD notes this resource with a status code of 6U, meaning it was determined ineligible for the National Register pursuant to Section 106 without review by the Office of Historic Preservation. SurveyLA assigned the resource a status code of 5D3, meaning that it appears to be a contributor to a multi-component resource that appears eligible for local listing. This code is referring to the Silver Lake Residential Historic District, of which the property is a listed contributor. This resource does not have views of the Project site and is not analyzed in the impacts analysis. It is located 947 feet northwest of the SLRC.

- **1841 Redcliff Street** (P19-167485): A single family residence only identified in BERD. The building was given a status code of 7R, meaning that it was identified in a reconnaissance level survey or in an Area of Potential Effect. This resource was not identified in SurveyLA. This resource does not have views of the Project site and is not analyzed in the impacts analysis. It is located 1,270 feet southwest of the SLRC.

**SurveyLA/HistoricPlacesLA**

In addition to the LAHCMs identified by BERD and SCCIC (VDL Research House; Neutra Office Building; and the Tierman House), SurveyLA also identified seven additional LAHCMs. The following LAHCMs have a view of the SLRC and will be included in the impacts analysis:

- **O’Neil Duplex No. 1** (2342 W Cove Avenue): Mid-century modern residence designed by Rodney Walker. It has direct views of the SLRC and is located 380 feet west of the SLRC.

- **Edward Tink Adams House** (2331 W Cove Avenue): Mid-century Modern residence designed by Albert Cooling and James De Long. It has direct views of the SLRC and is located 550 feet east of the SLRC.
The remaining LAHCMs do not have views of the SLRC and are located far enough away from the Project site that there would not be other project impacts such as construction noise and vibration. They are not included in the impacts analysis:

- **Engine Company No. 56** (2838 W Rowena Avenue): Spanish Colonial Revival fire station. It is located 1,214 feet north of the SLRC.
- **Nin Pole Residence** (2335 N Hidalgo Avenue): 5S1. International style residence designed by Eric Lloyd Wright. It is located 1,113 feet east of the SLRC.
- **Droste House** (2025 N Kenilworth Avenue): International style residence designed by R.M. Schindler. It is located 431 feet west of the SLRC.
- **Lipetz House** (1843 N Dillon Street): First residential commission designed by Raphael Soriano. It is located 1,094 feet southwest of the SLRC.
- **Wilson House** (2090 N Redcliff Street): International style residence designed by R.M Schindler. It is located 950 feet west of the SLRC.

SurveyLA further identified the Garbutt House, which is listed on the National Register and discussed in the SCCIC section above. SurveyLA also identified 47 resources listed as potentially eligible at the City, State, and/or Federal level; 9 public staircases recommended potentially eligible at the City level; 7 resources identified as needing more research as they were not visible from the public right of way.

SurveyLA also identified two historic districts located within 0.25-miles of the Project site: The Neutra Colony Residential Historic District Historic District and the Silver Lake Residential Historic District, both of which are described below. Both of these historic districts are discussed in the impacts analysis.

**Neutra Colony Residential Historic District**
The Neutra Colony Residential Historic District is located on the eastern side of the SLRC and is composed of Mid-Century or Late Modern residences. SurveyLA describes the district as follows:

The Neutra Colony Residential Historic District is located in the eastern portion of the Silver Lake neighborhood, directly east of the Silver Lake Reservoir. The district consists of ten architect-designed Mid-Century Modern or Late Modern residences concentrated near the intersection of Silver Lake Boulevard and Earl Street. All of the properties are contributors to the district. The district has a generally level grade and is divided into moderately sized rectangular lots, aside from one flag lot. The lots have dense vegetation, sometimes partially obscuring the residences from view. The residences are consistent in massing and scale; they are primarily two stories in height and are made up of rectangular volumes accented by ribbons of windows. Most of the residences have attached garages, generally to the rear of their respective parcels, a perimeter fence or hedge, and a deep setback from the street.8

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The significance statement for this district from SurveyLA is as follows:

Excellent and cohesive collection of Mid-Century Modern residences designed by notable architects Richard and Dion Neutra.9

Silver Lake Residential Historic District

The majority of the identified resources were contributing buildings to the Silver Lake Residential Historic District, a winding and expansive district that extends from the western side of the Project site to its northern end. The description of the district from SurveyLA is as follows:

The Silver Lake Residential Historic District is located in the western section of Silver Lake, in the hills that lie to the west and northeast of the Silver Lake and Ivanhoe reservoirs. Large in size and irregular in shape, the district wraps around the west and north ends of the reservoirs and is approximately bounded by Angus Street and Ivan Hill Terrace on the north; Landa Street, Kenilworth Avenue, and Tesla Avenue on the south; Griffith Park Boulevard on the west; and Silver Lake Drive and Armstrong Avenue on the east. In total, the historic district contains 1,171 properties, of which approximately 60% are contributors. Non-contributors were identified as such primarily because they post-date the period of significance or have been dramatically altered. Common alterations include window, door, and cladding replacement as well as additions to primary facades and upper stories. The district is composed primarily of one and two-story single-family residences, most of which are sited on hillside parcels. A small number of multifamily duplexes and triplexes are also located within the district boundaries. Given the area’s varied topography, the size and shape of individual parcels within the district vary considerably. District contributors were constructed on an incremental basis between 1925 and 1970, and thus embody a variety of architectural styles that correspond to their respective period of development. A small handful of residences predate the period of significance, but most of these earlier homes embody historical architectural styles and are established visual features of the neighborhood. Most residences within the district are designed in the Mid-Century Modern, Minimal Traditional, or one of several Period Revival styles, including primarily Tudor Revival and Spanish Colonial Revival. A total of 32 properties within the district boundaries were also identified as individually eligible resources. Vehicular circulation is provided by a network of curvilinear streets, all of which conform to the contour of the rolling hills that define the area’s topography. Streets within the district are paved with concrete, feature concrete curbs, and are lined with single-post metal streetlights accented by ornamental bases. Seven public staircases supplement the street network by facilitating pedestrian circulation throughout the district. Most houses within the district feature minimal setback and are landscaped with grass or ivy, shrubs, and mature trees of various species. Perimeter walls, fences, and hedges surround many parcels and hinder access and visibility from the public right-of-way.10

9 Ibid.
The significance statement for this district from SurveyLA is as follows:

Excellent example of an early automobile-oriented residential neighborhood, exhibiting distinctive site planning and tract features to accommodate the automobile. Due to a relatively high percentage of non-contributors, may not retain sufficient integrity for the National Register.11

Sacred Lands File Search

The NAHC maintains a confidential SLF database which contains resources of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on October 7, 2021, to request a search of the SLF. The NAHC responded to the request in a letter dated November 19, 2021, indicating that the results were positive. The response letter did not provide details on resources within the Project site, but suggested contacting the Gabrielleño Band of Mission Indians – Kizh Nation. The City contacted the Gabrielleño Band of Mission Indians – Kizh Nation through the AB 52 consultation process and discussed the positive SLF listing. The results of this consultation are summarized in the Tribal Cultural Resources section of this Draft EIR.

Geologic Map Review

The proposed Project falls within the greater Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges geomorphic province (Ingersoll and Rumelhart 1999). This basin can be broken down into subbasins that share a similar geological history (Yerkes et al. 1965; Sylvester and O’Black 2016). Each of these basins primarily formed from the migration of the San Andreas Fault Zone northward during the late Miocene (Irwin 1990; Powell and Weldon 1992; Critelli et al. 1995). Mountain ranges such as the Transverse Ranges bound these basins and are composed of older, uplifted rocks. As the various mountain ranges were folded and thrust upward, they eroded forming dissected surfaces and filling the intervening basins with thick piles of alluvium (Yerkes et al. 1965). While sediments dating back to the Cretaceous (66 million years ago) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 million years ago) (Yerkes et al. 1965). Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation. Most of these sediments are marine, until sea level dropped during the Pleistocene and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Project, specifically, lies in a valley within Yerkes and others’ (1965) ‘Northeastern block’ dissected into uplifted Miocene-age marine sediments. The bedrock formed in deep marine conditions and comprises mostly fine-grained shale that is well-cemented (Yerkes and Graham 1997). Dibblee and Ehrenspeck (1991) refer to these sediments as the sandstone member of the Monterey Formation (Tmss). Earlier geologists ascribed these units to the Puente Formation (Lamar 1970; Yerkes et al. 1977; Weber 1980) or the Modelo Formation (Hoots 1931 and Durrell 1954). The uplift occurred in the Pliocene or Pleistocene and the eroded valleys became the site of deposition of Quaternary-age alluvium (Dibblee and Ehrenspeck 1991). The current Silver

11 Ibid.
Lake Reservoir is entirely surrounded by alluvium though the proposed Project does impact the surrounding bedrock hills of the Monterey (Puente) Formation, dating to the Neogene or Upper Tertiary geological period that began 2.5 million years ago.

3.5.2 Regulatory Framework

Federal

National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment.” The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district’s significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and

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• Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.15

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because:

• It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
• It independently meets the criterion for listing in the National Register.

A resource that is listed in or eligible for listing in the National Register is considered “historic property” under Section 106 of the National Historic Preservation Act.

Criteria
To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;
B. Are associated with the lives of persons significant in our past;
C. 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. Have yielded, or may be likely to yield, information important in prehistory or history.16

Context
To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific property or site is understood and its meaning is made clear."17 A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

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3. Environmental Setting, Impact Analysis, and Mitigation Measures

3.5 Cultural Resources

Integrity
In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance.”18 The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. Some buildings or features may be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

Criteria Considerations
Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.19 Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.20 The full list of Criteria Considerations is provided below:

A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

B. A building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or

D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

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F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or

G. A property achieving significance within the past 50 years, if it is of exceptional importance.

**Secretary of Interior’s Standards for the Treatment of Historic Properties**

The National Park Service issued the Secretary’s Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary’s Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary’s Standards provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.  

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It is important to note that the Secretary’s Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

State

**California Environmental Quality Act**

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency’s determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is 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:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.
If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.\(^\text{22}\) If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.\(^\text{23}\)

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”\(^\text{24}\) According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.\(^\text{25}\)

**California Register of Historical Resources**

The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”\(^\text{26}\) The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California OHP. The criteria for eligibility for the California Register are based upon National Register criteria.\(^\text{27}\) Certain resources are determined to be

\(^{22}\) California Public Resources Code Section 21083.1(a).

\(^{23}\) State CEQA Statute and Guidelines, Section 15064.5(c)(4).

\(^{24}\) State CEQA Guidelines, Section 15064.5(b)(1).

\(^{25}\) State CEQA Guidelines, 15064.5(b)(3).

\(^{26}\) California Public Resources Code, Section 5024.1[a].

\(^{27}\) California Public Resources Code, Section 5024.1[b].
automatically included in the California Register, including California properties formally
determined eligible for, or listed in, the National Register. To be eligible for the California
Register, a prehistoric or historic-period property must be significant at the local, State, and/or
federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of
   California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. 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
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance
described above, and retain enough of its historic character or appearance (integrity) to be
recognizable as a historical resource and to convey the reason for its significance. It is possible
that a historic resource may not retain sufficient integrity to meet the criteria for listing in the
National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those
that must be nominated through an application and public hearing process. The California
Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible
  for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State OHP and
  have been recommended to the State Historical Resources Commission for inclusion on the
  California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties
  identified as eligible for listing in the National Register, the California Register, and/or a
  local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local
  ordinance, such as an historic preservation overlay zone.

**California Health and Safety Code**

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of
interference with human burial remains (except as allowed under applicable PRC Sections), and
the disposition of Native American burials in archaeological sites. These regulations protect such
remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be
implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

**California Public Resources Code**

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that would not be subject to further disturbance.

**City of Los Angeles**

**Los Angeles General Plan – Conservation Element**

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City’s policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City’s responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.28

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

**Silver Lake - Echo Park - Elysian Valley Community Plan**

The Land Use Element of the City’s General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and

28 City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5.
service systems. The community plans implement the City’s General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans’ texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans’ maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Silver Lake - Echo Park - Elysian Valley Community Plan\textsuperscript{29} was last updated in 2004. The plan addresses historic and cultural resources explicitly in Goal 16, but the community plan’s other outlined goals also address historic and cultural resources tangentially by encouraging the preservation, rehabilitation, and reuse of the neighborhood’s existing commercial buildings, residential buildings, and parks and open space. Because the community plan was developed and last updated in 2004, it does not specifically address the Los Angeles historic Resources Survey (SurveyLA), which was implemented and completed after the community plan. The goal, objective, and policy pertaining specifically to historic and cultural resources are as follows:

\textbf{Goal 16:} Identification, preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.

\textbf{Objective 16-1:} Ensure that the community’s historically significant resources are protected, preserved and/or enhanced.

\textbf{Policy 16-1.1:} Assist private owners of existing historic resources and historically or architecturally significant structures to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.

\textbf{Los Angeles Cultural Heritage Ordinance}

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The criteria for HCM designation are stated below:

- The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of with historic personages important to national, state, city, or local history; or

The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced him or her.30

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and OHR staff often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a “master” architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained “integrity”? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.” 31

Los Angeles Historic Preservation Overlay Zone Ordinance

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zone (HPOZs) in 1979; most recently, this ordinance was amended in 2017.

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30 City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.
31 City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.
Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey. For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

**Los Angeles Historic Resources Survey (SurveyLA)**

The City of Los Angeles Historic Resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City’s history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning’s OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City’s growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010 to 2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles’ Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of

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32 City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.
33 City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.
properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

3.5.3 Significance Thresholds and Criteria

The significance criteria used to evaluate the proposed Project impacts to cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, the proposed Project would have a significant impact if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. (Refer to Impact 3.5-1)
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. (Refer to Impact 3.5-2)
- Disturb any human remains, including those interred outside of dedicated cemeteries. (Refer to Impact 3.5-3)

In addition, the 2006 L.A. CEQA Thresholds Guide holds that the determination of significance shall be made on a case-by-case basis after considering the following factors:

Historical Resources

A Project would have a significant impact if a substantial adverse change in historic significance occurs due to any of the following:

- 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 which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards); or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.34 (Refer to Impact 3.5-1)

Archaeological Resources

A project would normally have a significant impact upon archeological resources if it would disturb, damage, or degrade an archeological 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 which 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. (Refer to Impact 3.5-2)

Methodology

**Historic Architectural Resources**

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. In general, a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a).

Substantial adverse change is defined in CEQA Guidelines Section 15064.5(b)(1) as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”

In addition, while assessing the project’s impacts under CEQA, it is important to consider the ability of the historical resources to retain their integrity. The seven aspects of integrity as defined by the National Park Service are location, design, setting, workmanship, materials, feeling, association. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment under CEQA.

The preparation of the technical report upon which this EIR is based involved the review of previous evaluations of the Silver Lake Reservoir Complex, including the Complex’s 1989 Los Angeles Historic Cultural Monument Nomination; a 2004 Greenwood & Associates report that evaluated the Project site; a 2019 GPA Consulting report that identified character-defining

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35 CEQA Guidelines Section 15064.5(b)(1)
features and alterations; and a 2020 GPA memorandum evaluating the proposed Project under the Secretary of the Interior’s Standards.37

The Historical Report supplements these previous studies with additional contextual research on the development of the Project site through an analysis and presentation of historical aerial photographs, as well as a pedestrian survey to verify the character-defining features previously identified. The Historical Report also includes an impacts analysis of direct, indirect, and cumulative impacts that may occur to the SLRC itself under the proposed Project. An archival records search of previously identified historic resources within 0.25-miles of the Project site was further conducted to obtain data on known historical resources in the vicinity to inform the indirect impacts analysis.

**Archaeological Resources**

The analysis of impacts to archaeological resources is also based on the Archaeological Resources Assessment Report, which included: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a 0.5-mile radius of the Project site, as well as a review of cultural resource reports and historic topographic maps on file, (2) a review of the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State HRI listings, (3) an SLF search commissioned through the NAHC, (4) a review of available Sanborn Maps, historic aerial imagery; and other technical studies, and (5) a pedestrian survey of the Project site.

The potential for the Project site to contain buried archaeological resources is assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources) and SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

**Human Remains**

The analysis of impacts to human remains is based on the Archaeological Resources Assessment Report. The potential for the Project site to contain human remains was assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

### 3.5.4 Project Design Features

The following Project Design Features (PDF) are applicable to the proposed Project.

**PDF-CR-1: Archaeological Resource Discovery During Construction.** If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has

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evaluated the find in accordance with State and local guidelines, including those set forth in California PRC Section 21083.2. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with State and local guidelines, including those set forth in California PRC Section 21083.2. If the discovery proves significant under CEQA (Section 15064.5f; PRC 21082), additional work such as testing or data recovery may be warranted. Should any Native American artifacts be encountered, additional consultation with NAHC-listed tribal groups should be conducted immediately. The process for contacting the tribal group and the timing of the contact should be addressed in the management plan.

PDF-CR-2: Human Remains Discovery During Construction. If human remains are encountered unexpectedly during construction demolition and/or grading activities, Section 7050.5 of the California Health and Safety Code requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California PRC 5097.98. Remains suspected to be Native American are treated under CEQA at CCR 15064.5; PRC 5097.98 illustrates the process to be followed if remains are discovered. If human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:
  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 am to 5 pm Monday through Friday) or
  323-343-0714 (After hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC.
- The NAHC will immediately notify the person it believes to be the MLD of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the MLD’s recommendations, the owner or the MLD may request mediation by the NAHC.

3.5.5 Impacts and Mitigation Measures

Historical Resource

Impact 3.5-1: Implementation of the SLRC Master plan would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section §15064.5.

Direct Impacts

Under CEQA Guidelines Section 15064.5 (b), the changes to a resource and its setting would only cause a substantial adverse change if they would detract from the integrity (location, design, setting, materials, workmanship, feeling, association) of the historical resource such that the
historical resource’s ability to convey its significance would be materially impaired to the degree that it would no longer be eligible as a historical resource pursuant to CEQA Guidelines Section 15064.5 (b). What follows is an analysis of the potential impacts of the proposed Project to determine whether the integrity of the historical resources would be retained under the Project and its eligibility as a significant historical resource would be retained, or if the proposed Project would alter the resource such that its significance would be materially impaired, and it would no longer be eligible as a historical resource. The environmental analysis was conducted in consultation with the Los Angeles City Planning, Office of Historic Resources (Personal communication 2022).

The proposed Project would represent a natural evolution of the SLRC and its uses. Over time, the SLRC has changed to accommodate practical needs, such as being converted to a solely domestic water supply, and community needs, such as the development of outdoor space like the recreation center and associated facilities for community use. As the SLRC is now decommissioned, the proposed Project is a continuation of the SLRC’s historical progression and adaptation to the changing needs to the community over time.

The complex’s footprint and shape would remain intact; its significant landscape features (Knoll and the Eucalyptus Grove) would be preserved; and no significant viewsheds would be detrimentally affected as a result of the proposed Project’s new construction or alterations. While there would be some changes to the grading and orientation of these open spaces, the overall footprint, feeling, and setting would remain intact. These spaces would remain green open spaces for passive recreation. The existing mature trees and plants would remain, and the overall footprint of these open spaces would not change. Further, the open water views of both reservoirs would remain intact.

Four new structures would be constructed as a result of the Project. The first is a new Environmental Education Center located at the base of the Knoll landscape. This building would be one-story, an appropriate scale for the surrounding residential neighborhood, and it would be built into the topography of the Knoll. It would be designed to fit into the neighborhood. Its roof would be an extension of the habitat of the Knoll and there would be outdoor classrooms. The Environmental Education Center is designed to be integrated into the Knoll’s landscape and would not result in a substantial visual change to the historic Knoll landscape. Character-defining features of the Knoll including its elevation and its wooded nature would not be harmed or destroyed as a result of the new construction. Due to the topography of the Knoll and the SLRC at large, and the intentional integration of the design of the Environmental Education Center into the Knoll’s existing topography, the new construction would largely be obscured from view from most vantage points. It would be, for all intents and purposes, a “hidden” building that would not substantially affect the SLRC’s character defining features and major view sheds. Although the Knoll has historically not had structures on it, the construction of this facility would be a minor alternation with minimal visual impact and the rest of the Knoll would retain its topographical features and wooded character. As shown in aerial photographs showing the SLRC from 1923 to 2016 (referenced in the “Construction History” section above), the Knoll has been an open area with trees and foliage for decades; the proposed alterations to the Knoll would largely retain this
use, albeit with new infrastructure to support passive recreation. However, these changes would not adversely affect the character-defining features of the Knoll.

Two shade pavilions would also be constructed, one in the Knoll and one at the northwest corner of the Ivanhoe Reservoir. These shade pavilions would likely be constructed with the same oval footprints as the Environmental Education Center and would be designed in compatible, sustainable, and natural materials. The shade pavilions would be low-rise, matching the character of the surrounding area, and would not obscure major views. The construction of the low scale and sensitively designed shade pavilions would not adversely affect the character-defining features of the Knoll or Ivanhoe Reservoir or the larger SLRC and would retain and preserve their integrity.

The final new building is the new 5,800 sf Multi-Purpose Facility/Recreation Center, located at the South Valley. The new facility would provide a needed increase in square footage to accommodate community use. It would be designed to be compatible with the existing recreation center. This new construction would not visually detract from the existing structure and would be compatible with the existing recreation center infrastructure.

Additional changes to the SLRC include the construction of various footpaths and trails to provide more efficient circulation around the SLRC and increased accessibility. New pedestrian paths and trails would be added to the Ivanhoe Reservoir area, the Knoll on the west side of the Reservoir, the East and West Narrows, and the Eucalyptus Grove area. While the paths of the Complex would be altered as a result of the Project, the overall shape of the reservoirs would be retained, and the overall perimeter paths of both the Silver Lake Reservoir and the Ivanhoe Reservoir, which are character-defining features, would remain largely intact. On the East Narrows, the low historic concrete walls along the road edges, a character-defining feature of the Complex, would be recognized and incorporated into the Promenade design. While a handful of cuts would be made in these walls to allow for pedestrian ingress and egress, these minor modifications are in line with previous similar alterations to the wall over the lifetime of the reservoir and would not negatively impact this feature. Further, the perimeter paths would mostly be retained and preserved. Aerial photographs of the Complex indicate that paths have previously been changed and altered over the years. For example, walking paths were added when the Meadow became a passive recreation space in 2011. The alterations and additions to this path system represent a continuation of this historical development. Further, the walking paths’ pavement is non-original. As a result, alterations to the pathways represent a progression of these developments and would only minimally affect the character of the walkways.

Further changes include the alteration of embankment edges of the Complex, which would be changed in order to construct habitat terraces, seating terraces, and habitat islands. When the reservoirs were first constructed, the embankments were unpaved earthen slopes. Over time, they were altered to become paved surfaces, once in 1920 as well as in subsequent years, notably in the 1951-1953 alterations to the Complex. The embankment around the Ivanhoe Reservoir was resurfaced approximately 25 years ago with concrete paving. The Silver Lake Reservoir’s embankment is paved with asphalt and cracks have been infilled and repaired over time. The paving of the embankment of the Silver Lake Reservoir is a character-defining feature, but changes to this paving would not affect the overall eligibility of the Reservoir. Further, some of
the paving would remain in place. The changes to the embankment represent another iteration of the Complex’s evolution. Although the embankments would be changed, their inherent configuration, shape, and orientation would remain.

Habitat islands would also be added to both the Ivanhoe and Silver Lake Reservoirs. The construction of these habitat islands would not affect any character-defining features and the open water views for both reservoirs would remain. Additional changes would include the construction of outlooks at various points around the reservoir, as well as the addition of outdoor seating, new plants and trees, and a fitness facility on the East Narrows. The addition of these features would not affect any character-defining features of the SLRC district and are indicative of the evolution of the Complex into a passive recreation area. Both reservoirs would remain intact and eligible as resources after the completion of these changes.

Contributing features that would experience no adverse effect to their character-defining features at the conclusion of the Project include: the North Ivanhoe Dam; the Ivanhoe Reservoir (overall shape, embankment configuration, and water level would be retained); the South Ivanhoe Dam; the Ivanhoe Inlet Tower which would remain in place; the Ivanhoe Reservoir Chlorination Station which would remain intact; the Caretaker’s House (Sunshine House), garage, shed (old caretaker’s house), landscape building and bathroom building, located on the east side of the SLRC, which would all remain intact; stone retaining walls; the Chlorine Plant, which would remain in place and intact; the main entrance and access road which would retain their configuration and asphalt paving; Armstrong secondary entrance; the West landscaped area, which would retain its mature trees and would undergo additional planting and seating on the embankment; and the grassy patch, which would retain its mature trees.

The Silver Lake Reservoir would also retain its shape, boat launches, embankment configuration, and water level. While changes would occur to the embankment paving and appearance as a result of new park infrastructure, these changes would not detrimentally affect the eligibility of the resources. Further, embankment changes have occurred over time. As such, the Silver Lake Reservoir would remain eligible despite minimal changes to its embankment paving.

The Knoll would also undergo changes, but these changes would not affect the overall shape or feeling of the Knoll. The character-defining features of mature trees and the Knoll’s grading would remain intact. New construction would be sensitively and compatibly designed, as described above, and would not adversely affect the Knoll’s eligibility as a resource and would have a less than significant impact.

However, construction activities at the Project Site have the potential to generate groundborne vibration that could damage character-defining features of the SLRC, as the operation of heavy equipment (e.g., vibratory pile driver, backhoe, dozer, excavators, drill rig, loader, scraper, and haul trucks) generates vibrations that propagate through the ground. Depending on the construction procedures and the equipment used, Project construction would generate varying degrees of ground vibration that could cause damage to historic structures. The PPV vibration velocities for several types of construction equipment measured at increasing distances are identified in Table 3.12-23, Construction Vibration Impacts – Building Damage. This table
includes the estimated vibration velocity levels at the South Outlet Chlorination Station and the Meter House (V8), both considered historic resources and Category IV building (buildings extremely susceptible to vibration damage). South Valley construction activities, including construction of the new multi-purpose building, would occur in the vicinity of these historic resources, including dozers or loaded trucks within approximately 15 feet of these buildings. Vibration levels from these activities would be up to approximately 0.191 inches per second PPV, which would exceed the significance threshold of 0.12 inches per second PPV. Therefore, vibration impacts associated with structural damage from on-site construction activities would be potentially significant at the SLRC prior to implementation of mitigation measures.

**Mitigation Measures:**

Implementation of Mitigation Measure NOISE-5.

**Significance Determination:**

Less than Significant Impact with Mitigation Incorporated

**Indirect Impacts**

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of historical resources within the Project vicinity, as well as their immediate surroundings, that would detract from their ability to convey their significance. There are a total of 650 previously recorded historical resources (located in Appendix F). Due to the high volume of previously identified resources within 0.25-mile of the SLRC, the impacts analysis is limited to only those resources that have views of the Project site. Direct views are defined as views of the open water from the resource's primary elevation from the public right-of-way. Indirect views are defined as watershed views that are partially obscured by other residences or foliage, or that have a direct view of the perimeter or parks around the complex but not of the water. These 103 resources that have views of the Project site and/or the SLRC are listed in Appendix F.

**Richard and Dion Neutra VDL Research House and Landscape (2300 N Silver Lake Boulevard; P-19-188871)**

The VDL Research House and Landscape, designed by master modern architect Richard Neutra and his son Dion Neutra, is a designated LAHCM and a National Historic Landmark. It is located approximately 85 feet east of the SLRC on a sloping hillside amongst other residential resources. Originally, there was another house on the site constructed in 1932 that burnt down in a fire in March 1963. Dion Neutra, along with his father, rebuilt the house with the original footprint, albeit with changes. The house was Neutra’s residence as well as a professional hub where many modern architects like Gregory Ain, Harwell Harris, and Raphael Soriano started their careers. Over decades, hundreds of Neutra’s projects were designed at the VDL House.

The VDL Research House and Landscape is located on the east side of the complex, on West Silver Lake Boulevard, and overlooks the Silver Lake Meadows and the Silver Lake Reservoir. The view from the VDL House celebrates the expansive meadow, trees, and the open water of the Silver Lake Reservoir. The VDL House was explicitly designed to incorporate water views of the Silver Lake Reservoir, as demonstrated by a small reflecting pond on the second-floor level that was designed to serve as an infinity pool with the open water views of the Reservoir in the background.
Changes to the SLRC under the Project that would be visible from the VDL House would result from the reconfiguration of the existing open space of the Meadow, including slight elevation changes, a picnic grove, the addition of footpaths and informal play paths, and an ornamental garden. However, these changes would be consistent with the current character of the Meadow. The ornamental garden and picnic grove appear to be graded so that they would be minimally visible from the VDL House. While walking paths and an informal play area would be added, there are already walking paths in this part of the Meadow and this change would not introduce a visually obtrusive or new design element to the view shed from the VDL House. While these alterations would minimally change the view from the VDL House, the overall views of open grass and open water would not be substantially changed and would not adversely affect the design intent of the VDL House or the character of its intended views of the surrounding setting.

Another change to this area is the construction of an entry and overlook plaza near the intersection of Silver Lake Boulevard and Earl Street. The VDL House is a block north of this intersection, and multiple houses and trees separate the house from the new plaza. As a result, this new construction would not adversely affect the VDL House.

There would also be habitat islands added to the Silver Lake Reservoir under the Project that would likely be visible from the VDL House. The open water of the reservoir, however, would still be visible upon completion of the Project. Further, the views from the VDL House have changed over the years as a result of the changing setting and the alterations to the reservoir. The addition of habitat islands would not substantially impact or change the character of the views from the VDL House and would continue the evolution of the use and views of the reservoir.

Shade trees would be planted and a promenade along Silver Lake Boulevard would be created with additional trees planted along the promenade. Although there are currently trees in this area, the new plantings would actually be less obtrusive to the original view from the VDL House, which has been partially obstructed due to plantings and a traffic light, and would be somewhat restored. The VDL House would not be physically or materially impaired as a result of the Project, and the visual connection of the VDL infinity pool to the Reservoir would be partially reestablished. All its physical character-defining features would remain intact at the conclusion of the Project. While the design intent of the VDL House regarding its view shed and associated setting would be affected by changes under the Project, the proposed changes would minimally detract from the integrity of the resource and would not substantially detract from the setting, feeling, and association of the VDL Research House and Landscape. The VDL House and Landscape is eligible under criterion C/3 for its design and association with Richard and Dion Neutra as well as an example of mid-century modern architecture. Its integrity of design, workmanship, materials, and location would remain intact at the conclusion of the proposed Project.

Therefore, potential indirect impacts of the proposed Project and offsite improvements are less than significant to the VDL Research House and Landscape because the Project would not materially impair this resource or interrupt primary views in a manner that would adversely affect the ability of the historical resource to convey its significance. At the conclusion of the proposed Project, the significance and integrity of the resources would remain intact.
Mitigation Measures:

None Required

Significance Determination:

Less than Significant Impact

102 Historic Resources with Direct or Indirect Views of the Project Site

The remaining 102 resources have views of the SLRC that may be slightly altered as a result of the proposed Project. All of these resources are residential buildings, most of which are contributors to the Silver Lake Residential Historic District. The residences are designed in a variety of styles, including Period Revival styles like Spanish Colonial, American Colonial Revival, and Tudor Revival, and date from 1915 to 1979. Many of the later resources were constructed in the Mid-Century Modern and International styles, including designs by such notable architects as Rodney Walker, Eugene Choy, Harwell Hamilton Harris, and Richard and Dion Neutra. Because the SLRC is expansive and the Silver Lake Residential Historic District extends from the west side of the Complex to the north with varied topography that affect individual resources’ view of the Complex, contributors to the district have very different views of the SLRC. As a result, they have been pulled out separately for analysis based on views.

The resources are all located in residential neighborhoods that have been consistently residential since their earliest development. The Project would not introduce a new use or typology to the area and all the adjacent neighborhoods would remain residential in nature. The use of the SLRC would be passive recreation, consistent with how much of the SLRC is already used, and the overall footprint and size of the complex would remain the same. The Project would not introduce a substantial new scale or massing to the existing setting, nor would it physically impact or materially impair the adjacent resources.

The integrity of setting for these resources would be slightly changed as result of the proposed Project, but these changes do not significantly detract from the neighborhood setting. The SLRC is not being demolished or removed; it would remain extant with its character-defining features intact. As a result of proposed alterations, residences would experience some change in view – for example, those resources that are located on the West side of the SLRC may see changes to their view as a result of the planting of additional trees and vegetation in the Eucalyptus Grove, but these changes in settings and view are minor. New construction at the SLRC would be minimal and is limited to small-scale sensitively designed construction that is the same scale as the surrounding neighborhood.

Although there would be slight view changes for some of these residences which may marginally affect their integrity of setting, the setting would largely remain intact. The resources would all still be located in a residential neighborhood around the Reservoir, which would remain a neighborhood nucleus. The layout of the streets is not changing as a result of the Project, nor is the topography or scale. The residences would still have views of the SLRC. The changes would not affect the eligibility of individual resources or historic districts.

Consequently, the minor change in views and setting would not detract from these resource’s ability to convey their significance. No character-defining features of these resources would be
changed or impacted at the conclusion of the Project. The Project would not have a physical or material effect on any of these resources. At the conclusion of the Project, the resources’ integrity of location, design, materials, workmanship, setting, feeling, and association would remain intact and these resources would not experience a substantial material change.

Therefore, indirect impacts of the Project to historical resources in the surrounding vicinity (0.25-mile radius) are less than significant because the Project would not materially impair these resources or their setting or interrupt primary views in a manner that would adversely affect the ability of these historical resources to convey their significance. At the conclusion of the Project, the significance and integrity of these resources would remain intact.

Mitigation Measures:
None Required

Significance Determination:
Less than Significant

**Neutra Colony Residential Historic District**
The Neutra Colony Residential Historic District is a small district located on the eastern side of the SLRC. It contains ten Mid-Century Modern or Late Modern residences designed by Richard and Dion Neutra that are concentrated near the intersection of Silver Lake Boulevard and Earl Street. While most of these resources were specifically designed to incorporate views of the Silver Lake Reservoir, some do not have views of the SLRC from the public right-of-way. Six residences have direct views of the SLRC and four have no views of the SLRC from the public right-of-way. For the purposes of CEQA, only views from the public-right-of-way are considered. Therefore, of the setting of those resources with existing views from the public right of way would not change substantially as a result of the proposed project. More importantly, any small change to the setting and views would not affect the integrity of any of these resources. The feeling, association, workmanship, design, materials, and location would all remain intact. The setting would change slightly with the proposed alterations to the Meadow, which most of these resources face, but this alteration would be minimal. The spatial relationship between these residences and the SLRC would remain intact and the character of the neighborhood as a whole would remain unchanged. There would be no introduction of a new scale or massing as a result of the Project. At the conclusion of the Project, the individual resources within the District and the District as whole would remain intact and eligible as an excellent and cohesive example of a collection of Modern residences designed by Richard and Dion Neutra.

Therefore, the Project would not materially impair the significance of these contributing resources or the historic district as a whole. As such, indirect impacts are less than significant. At the conclusion of the Project, the significance and integrity of these resources and historic district would remain intact.

Mitigation Measures:
None Required
Significance Determination:
Less than significant

Silver Lake Residential Historic District
The Silver Lake Residential Historic District includes 1,171 residential properties with a period of significance that spans from 1925 to 1970. The homes are located in a large area to the west and north of the Reservoirs and 60 percent of the properties are district contributors.

While the Project would affect the view sheds of several of the contributing resources, included in the analysis above, it would not result in a material change to any of these resources that would affect their eligibility as contributors to the district. The proposed Project would not introduce a substantial new scale or massing to the existing setting, nor would it physically impact or materially impair the district and, therefore, would have no impact to the integrity of location, design, workmanship, or materials of the resources. While the view from some individual residences would be considered a character-defining feature of their setting and part of their design intent, far more of these resources currently have no views of the SLRC at all. More importantly, the specific views of the SLRC from individual resources is not a character defining for the district as a whole. Therefore, the potential impact of these changes to the setting and views as a result of the project would be minimal and only effect a small percentage of contributing resources.

The orientation and spatial relationship of these residences to the SLRC would remain intact. At the conclusion of the Project, all resources would remain eligible as district contributors and the district as a whole would remain eligible. The district would still remain an example of early automobile-oriented residential neighborhood, exhibiting distinctive site planning and tract features to accommodate the automobile.

Therefore, the Project would not materially impair the significance of these contributing resources or the historic district as a whole. As such, indirect impacts are less than significant. At the conclusion of the Project, the significance and integrity of these resources and historic district would remain intact.

Mitigation Measures:
None Required

Significance Determination:
Less than significant

Archaeological Resource
Impact 3.5-2: Would the proposed Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

No archaeological resources are documented within the proposed Project site. However, the Canal & Reservoir Ditch is depicted on maps as described above, adjacent to the east side of the Project site. This resource therefore may be preserved under the pavement and may have a
connection within the Project site. The City of Los Angeles has treated the Zanja system as a historical resource under CEQA Guidelines Section 15064.5(a)(3).

The records search through the CHRIS-SCCIC revealed that no prehistoric or historic archaeological resources have been previously recorded within the Project site; however, the one historic period archaeological resource was previously recorded within 0.10-mile from the Project site, the Canal and Reservoir Ditch, was described as running through the Project site. There may be evidence of the early uses of the marshland, the Canal and Reservoir Ditch, and early water infrastructure associated with the development of the reservoir.

The records search through NAHC’s SLF yielded positive results, although specific details of the nature and location of the resource(s) were not provided. The NAHC suggested contacting the Gabrieleño Band of Mission Indians – Kizh Nation for information regarding these positive results. The NAHC also provided a list of other Native American tribes to contact as they may have knowledge of cultural resources within the Project site. It is possible the finding was due to the nearby Canal and Reservoir Ditch, which is described as having previously run through the Project site. The City is conducting consultation with appropriate tribes per AB 52 requirements and the results of this consultation will be summarized in the Tribal Section of the Draft Environment Impact Report for the proposed Project.

Archaeological resources were not identified during the pedestrian survey of the Project site. Surface visibility was impeded due to the Project site being largely developed with surface parking lots or buildings.

Therefore, there is potential for ground disturbing activities to encounter archaeological materials associated with the former historic uses of the Project site. The Project site is also considered to have higher sensitivity for prehistoric archaeological resource due to the proximity to fresh water and riparian resources offered by the marsh that was present within the Project site that could have attracted prehistoric inhabitants for subsistence, if not necessarily sustained occupation.

However, research into site disturbance indicated that multiple phases of construction within the reservoir complex have resulted in substantial disturbance to the complex. Fill was used from the bottom of the reservoir and subjected to processing and compaction in the Meadow and Dams. In addition, portions of the Project site also have the Puente Formation at the surface which is 2.5 million years old or older and although could have potentially have prehistoric resources present on the surface at one time, due to the disturbance over more than 100 years, this is highly unlikely and the formation is too old to contain prehistoric resources related to past human civilization in the area. Therefore, monitoring has been recommended as mitigation for the areas containing native quaternary alluvium within the Knoll and the Eucalyptus Grove which has not been impacted by Reservoir development. Historic archaeological resources could be preserved within fill at the South Valley, the East West Narrows, the Eucalyptus Grove, and areas of quaternary alluvium within the Knoll.

Although no known archaeological sites or unique archaeological resources that may be considered historical resources under CEQA are known to be located within the Project’s potential areas of impact, unanticipated resources could be encountered. As a result of these
findings, Project excavations have a high potential for encountering buried historic and
prehistoric archaeological resources in the South Valley, East West Narrows, Eucalyptus Grove,
and areas of quaternary alluvium within the Knoll. Preservation in place (i.e., avoidance) is the
preferred manner of treatment. If, in coordination with the City, it is determined that preservation
in place is not feasible, appropriate treatment of the resource shall be developed by the Qualified
Archaeologist in coordination with the City and may include implementation of archaeological
data recovery excavations to remove the resource along with subsequent laboratory processing,
analysis, and reporting. Therefore, the following Project Design Features as well as Mitigation
Measures for the Project would be implemented to ensure that if any archaeological resources are
found during the construction of the Project, they would be handled in compliance with State law
such that any potential impacts would be reduced to less than significant levels. These measures
were developed in conformance with, and incorporate the performance standards of California
PRC Sections 5097.98 and 21083.2, the guidelines of the City of Los Angeles General Plan
Conservation Element, and Section 6-3.2 “Archaeological and Paleontological Discoveries” from
the Standard Specifications for Public Works Construction (“The Greenbook”; Public Works
Standards, Inc. 2018).

In accordance with PDF-CR-1 which applies to the Project for areas where monitoring is not
required, and in order to avoid project construction delays, the following Mitigation Measures
would be implemented to define performance standards and provide additional avoidance of
impacts within the specific locations in the Project area as well as activities that are defined in the
mitigation measures. With adherence to PDF-CR-1 and implementation of Mitigation Measures
CR-1 through CR-4, impacts to archaeological resources would be less than significant.

Mitigation Measures:

**CR-1: Archaeological Monitoring.** The City shall retain a qualified Archaeologist who
meets the Secretary of the Interior’s Professional Qualifications Standards for
professional archaeology (qualified Archaeologist) to carry out and ensure proper
implementation of mitigation measures that address archaeological resources. The
qualified Archaeologist shall oversee an archaeological monitor who shall be present
during construction activities on the Project Site deemed by the qualified Archeologist to
have the potential for encountering archeological resources, such as demolition,
clearing/grubbing, drilling/auguring, grading, trenching, excavation, or other ground
disturbing activity associated with the Project in areas of historic fill or previously
undisturbed sediments, and in the vicinity of the Canal & Reservoir Ditch, within the
South Valley, the East West Narrows, the Eucalyptus Grove, and areas of quaternary
alluvium within the Knoll. The archeological monitor shall have the authority to direct
the pace of construction equipment activity in areas of higher sensitivity and to
temporarily divert, redirect or halt ground disturbance activities to allow identification,
evaluation, and potential recovery of archaeological resources in coordination with the
qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or
ceased entirely, if determined appropriate by the qualified Archaeologist.

**CR-2: Archaeological Resources Sensitivity Training.** Prior to commencement of
construction activities, a Sensitivity Training shall be given by the qualified
Archaeologist for construction personnel. The training shall focus on how to identify
archaeological resources that may be encountered during construction activities, and the
procedures to be followed in such an event. Within 5 days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the City.

**CR-3: Discovery of Archaeological Resources.** In the event that historic-period (e.g., bottles, foundations, early infrastructure, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work may continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. If any prehistoric archaeological sites are encountered within the project area, consultation with consulting Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment and shall be explored to see if Project activities can avoid archaeological resources, such as: if the archaeological site can be deeded into a permanent conservation easement, if the resources can be capped with chemically stable soil or if the resource can be incorporated within open space.

If, in coordination with the City, it is determined that preservation in place is not feasible, and in order to mitigate potential impacts to significant resources pursuant to Section 15064.5 of CEQA, date recovery is feasible. Appropriate treatment of the resource shall be developed by the Qualified Archaeologist in coordination with the City. A data recovery plan shall be implemented. A data recovery plan will make provision for adequately recovering the scientifically consequential information from and about the historical resources. and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing, analysis, reporting, and commemoration in the form of signage or other public education and awareness.

Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.

**CR-4: Archeological Monitoring Reports.** At the conclusion of the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation’s Archaeological Resource Management
Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be prepared under the supervision of the qualified Archaeologist and submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

**Significance Determination:**

Less than Significant Impact with Mitigation Incorporated

**Human Remains**

**Impact 3.5-3: Would the proposed Project disturb any human remains, including those interred outside of dedicated cemeteries?**

No human remains were identified during the pedestrian survey of the Project site and no known human remains have been recorded within the Project site or a 0.50-mile radius. Archaeological deposits are frequently located in relatively close proximity to water sources (such as the Los Angeles River, located 0.5-miles west of the Project site), or marsh lands, and these deposits could contain human remains. Therefore, some potential for the presence of human remains may exist.

However, the proposed Project site has been previously disturbed by the original construction of the reservoir complex; and if present would have likely been detected previously. However, although unlikely, Project grading and excavation into deeper previously undisturbed subsurface areas may encounter buried human remains. If such remains were to be encountered, they would be protected under applicable regulations.

California PRC Section 5097.98, as amended by Assembly Bill 2641, protects cultural resources on public lands and provides procedures in the event human remains of Native American origin are discovered during project implementation and are required to address the Project’s potential impacts to human remains. PRC Section 5097.98 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a prescribed protocol for their disposition in accordance with applicable regulations, notification of the NAHC and subsequent tribal coordination if remains are determined to be of Native American descent. PDF-CR-2: Human Remains Discovery During Construction for the proposed Project would be implemented to ensure that if any human remains are found during the construction of the Project, they would be handled in compliance with State law in conformance with California PRC Sections 5097.98. Impacts would be considered less than significant.

**Mitigation Measures:**

None Required

**Significance Determination:**

Less than Significant Impact
Cumulative Impact

Impact 3.5-4: Would the proposed Project construction and operation, when considered with related projects in the geographic scope, result in a cumulatively considerable impact to cultural resources?

Historic Resources

Construction impacts to historical resources, both direct and indirect, tend to be site specific. However, cumulative impacts can occur if a project and other related projects in the adjacent area would together cumulatively affect in an adverse manner the eligibility of a historical resource and/or resources. A significant cumulative impact associated with the Project would occur if the impact would render an individual historical resource or historic district no longer eligible for historic listing, and the Project’s contribution to the impact would be cumulatively considerable.

In assessing cumulative impacts on historical resources, the focus is on related projects that are located in the immediate vicinity of the Project that have the potential to contribute to changes in the setting of identified historical resources on the Project Site and in the vicinity, including historic districts. A list of thirteen related projects that are planned or under construction in the immediate vicinity of the Project Site was compiled to support the analysis of cumulative impacts for the Project. Table 3-2 identifies thirteen related projects that are planned or are under construction within the Project area:

- Related Project 1: 1629 North Griffith Park Boulevard, planned conversion of a historic (1932) church into a 26-room hotel with associated pool, restaurant, and lounge, located approximately 3,200 feet from the Project Site.
- Related Project 2: 1750 North Glendale Boulevard, a 5-story apartment building with 70 units totaling 61,000 square feet, located approximately 2,200 feet from the Project Site.
- Related Project 3: 2828 North Glendale Boulevard, planned conversion of a three-story church and an adjacent three-bedroom house into a childcare center for up to 175 kids. The project is located approximately 1,400 feet from Project Site.
- Related Project 4: 2280 North Glendale, residential development of six condominium units across three lots, located approximately 2,200 feet from the project site.
- Related Project 5: 3301 West Sunset Boulevard, a mixed-use project that includes apartments, commercial and retail space located 3,100 feet from the project site.
- Related Project 6: 3225 West Sunset Boulevard, a mixed-use development including 82 apartments, 2,500 square feet of retail space, 4,600 square feet of office space and a 2,900 square foot restaurant, located approximately 3,200 feet from the Project Site.
- Related Project 7: 2600 West Riverside Drive, a residential building to include 120 condo units, located approximately 4,400 feet from the Project Site.
- Related Project 8: 3012 West Sunset Boulevard, a residential building to include 74 apartment units, located approximately 4,000 feet from the Project Site.
- Related Project 9: 2225 West Sunset Boulevard, demolition of existing residential and commercial buildings and construction of a new multi-family residential building with 176 units, located approximately 5,000 feet from the Project Site.
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- Related Project 10: 4311 West Sunset Boulevard, a mixed-use development including 108 residential units, 1,000 sf of restaurant space and a 4,500 sf fitness center, located approximately 5,000 feet from the Project Site.

- Related Project 11: 4100 West Sunset Boulevard, a mixed-use development including 91 residential units, and 10,000 sf of commercial/retail space, located approximately 4,300 feet from the Project Site.

- Related Project 12: LADWP Aeration and Recirculation System Project: includes installation of a bubble plume aeration system and a recirculation pipe system to ensure oxygenation and destratification of the reservoirs, located within the Project Site.

- Related Project 13: Sidewalk Repair Program: includes sidewalk repairs south of the Silver Lake recreation Center, adjacent to West Silverlake Drive, Van Pelt Place, Silverlake Boulevard, and at the intersection of Duane Street and Silverlake Boulevard.

Related projects 1, 5, 6, 7, 8, 9, 10 and 11 are located over a half a mile from the Project Site and would in no way alter the setting or views of the Project Site or any of the adjacent historical resources. While the structure associated with Related Project 1 is likely a historical resource, it is a church and is in no way a similar type or style of historic resource as the SLRC.

Related projects 2 and 4 include the development of multi-family residential buildings, up to a height of 5-stories. While there is a possibility for views of these projects from the SLRC, they would not alter the setting of the resource or any of the adjacent resources. Modern infill and multi-family residential are already present within the immediate setting of the SLRC as well as the setting of nearly all the adjacent resources. While the majority of the structures in the immediate vicinity of the SLRC are single-family residential, and the majority of the adjacent resources are also single-family residential, the addition of a three-story or five-story apartments building to the viewscape of any of these resources is not unusual. Modern infill and multi-family residential already exist within their immediate setting and neither contributes to nor detracts from their historic setting. The addition of this modern infill and multi-family residential structures would not alter the neighborhood surrounding the SLRC, or the residential neighborhood of the adjacent resources.

Related project 3 also would not alter the setting or character of the SLRC or any of the adjacent resource. The structures that presently exist on the site would simply be converted in use, and there would be very little actual alterations to the buildings and their current appearance. Additionally, there is a childcare center located on the Project Site, so there would no introduction of a new use to the setting of the SLRC or to the setting of any of the adjacent resources.

Additionally, while there is potential for these related projects to be under construction at the same time as the Project, all of them are located at least .15 miles from the Project Site and there is no potential for damage to this historical resource due to construction-related vibration and settlement.

Related Projects 12 and 13 are City infrastructure projects that are currently in progress. While they are located within (12) or immediately adjacent (13) to the Project Site, both related projects
are expected to be completed before the commencement of construction of the Project and, therefore, would not contribute to cumulative noise or vibration impacts.

For these reasons, the Project, considered together with the related projects, would not contribute considerably to a cumulatively significant impact on historical resources.

**Mitigation Measures:**
None Required

**Significance Determination:**
Less than Significant Impact

**Archaeological Resources and Human Remains**

Many of the related projects, including the nine related projects in the Project vicinity, would be expected to require grading and excavation that have the potential to encounter archaeological resources and human remains, although in some cases, these related projects are located in developed urban areas with sites that have been previously disturbed, which would reduce the likelihood of encountering archaeological resources and human remains. As discussed above, the Project has the potential to for inadvertent archaeological discovery and would be required to implement PDF-CR-1 and PDF-CR-2 and Mitigation Measures CR-1 through CR-4, which would reduce the Project's impacts on archaeological resources to less than significant. Similarly, as part of environmental review for the related projects, it is expected that mitigation measures would be imposed where necessary to reduce the potential for significant impacts on archaeological resources, as is required by the City.

In addition, each related project would be required to comply with applicable regulatory requirements, such as CEQA Guidelines Section 15064.5 and PRC Section 21083.2, which address archaeological resources, and PRC Section 5097.98 and State Health and Safety Code Section 7050.5, which address human remains. Compliance with regulatory requirements and implementation of required mitigation measures for each individual development project would ensure that impacts to archaeological resources remain less than significant and reduce the potential for the individual related projects to contribute to cumulative impacts. As such, Project impacts to archaeological resources and human remains are not cumulatively considerable and cumulative impacts would be less than significant. For these reasons, the proposed Project, considered together with the related projects, would not contribute considerably to a cumulative adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

**Mitigation Measures:**
None Required

**Significance Determination:**
Less than Significant Impact

**3.5.6 Summary of Impacts**

*Table 3.5-1* summarizes the impact significance determinations and lists mitigation measures related to cultural resources.
3. Environmental Setting, Impact Analysis, and Mitigation Measures

3.5 Cultural Resources

### TABLE 3.5-1
SUMMARY OF PROPOSED PROJECT IMPACTS TO CULTURAL RESOURCES

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.5-1: Historical Resource</td>
<td>None Required</td>
<td>LTS</td>
</tr>
<tr>
<td>3.5-2: Archaeological Resource</td>
<td>Mitigation Measures CR-1</td>
<td>LTSM</td>
</tr>
<tr>
<td></td>
<td>through CR-4</td>
<td></td>
</tr>
<tr>
<td>3.5-3: Human Remains</td>
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<td>LTS</td>
</tr>
<tr>
<td>3.5-4: Cumulative</td>
<td>None Required</td>
<td>LTS</td>
</tr>
</tbody>
</table>

**NOTES:**

NI = No Impact, no mitigation proposed
LTS = Less than Significant, no mitigation proposed
LTSM = Less than Significant Impact with Mitigation Incorporated
SU = Significant and Unavoidable

3.5.7 References


California Public Resources Code, Section 5024.1[a].

California Public Resources Code, Section 5024.1[b]

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CEQA Guidelines Section, 15064.5 (b)(3).

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