

IV. Environmental Impact Analysis

E. Cultural Resources

1. Introduction

This section provides an analysis of the Project's potential impacts associated with cultural resources, including historic, archaeological and paleontological resources. The analysis of historic resources is based on the *Ford Theatres Project Historic Resource Report (Historic Resource Report)* prepared by Galvin Preservation Associates (May 14, 2014) included as Appendix F of this Draft EIR. In addition, the analysis of potential impacts on archaeological and paleontological resources is based on the records searches included as Appendix G of this Draft EIR, and a review of existing conditions within the Project Site.

2. Environmental Setting

a. Regulatory Framework

Numerous laws and regulations require federal, state, and local agencies to consider the effects of a project on cultural resources. The National Historic Preservation Act of 1966, as amended, the California Environmental Quality Act (CEQA), and the California Register of Historical Resources are the primary laws governing historical, archaeological and paleontological resources of national, state and local significance within the Project vicinity. A summary of these laws and regulations is provided below.

(1) Federal—National Register of Historic Places

Authorized under the National Historic Preservation Act of 1966, as amended, the National Register of Historic Places (National Register) is “an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”¹ The National Register recognizes properties that are significant at the national, State, and local levels.

¹ Title 36 Code of Federal Regulations Part 60.2.

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following criteria for listing in the National Register:

- a) *Associated with events that have made a significant contribution to the broad patterns of our history; or*
- b) *Associated with the lives of persons significant in our past; or*
- 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) *Yield, or may be likely to yield, information important in prehistory or history.*

In addition to meeting any or all of the criteria listed above, a property nominated for listing on the National Register of Historic Places must have integrity. As defined in the *National Register Bulletin 15*, integrity is “the ability of a property to convey its significance.”² The National Park Service recognizes seven aspects or qualities of integrity: feeling, association, workmanship, location, design, setting, and materials. The following is excerpted from the *National Register Bulletin, How to Apply the National Register Criteria for Evaluation*, which provides guidance on the interpretation and application of these factors:³

- *Feeling:* is a property’s expression of the aesthetic or historic sense of a particular period of time.
- *Association:* is the direct link between an important historic event or person and a historic property.
- *Workmanship:* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

² *National Register Bulletin 15. How to Apply the National Register Criteria for Evaluation. Washington DC: U.S. Department of the Interior, National Park Service, 1997.*

³ *Ibid.*

- *Location*: is the place where the historic property was constructed or the place where the historic event took place.
- *Design*: is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting*: is the physical environment of a historic property.
- *Materials*: are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

In assessing a property's integrity, the National Park Service also recognizes that properties change over time. Therefore, as described in the *National Register Bulletin 15*, "it is not necessary for a property to retain all of its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity."

To be eligible for listing in the National Register, a property must also be significant within a historic context. According to the National Register Bulletin 15, 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." 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.

Additionally, the National Park Service defines the period of significance as "the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for... listing" in national, State or local registers. A period of significance can be "as brief as a single year... [or] span many years." It is based on "specific events directly related to the significance of the property," for example, the date of construction, years of ownership, or length of operation as a particular entity.

(2) State

The California Office of Historic Preservation (OHP), a division of the California Department of Parks and Recreation, implements the policies of the National Historic Preservation Act on a statewide level. The OHP also carries out the duties as set forth in the Public Resources Code and maintains the California Historic Resources Inventory and California Register of Historical Resources. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the state. Also implemented at the state level, CEQA requires the identification and mitigation

of substantial adverse impacts that may affect the significance of identified historical resources and archaeological resources as part of the environmental review process conducted under CEQA.

(a) California Register of Historical Resources

The California Register of Historical Resources (California Register) was enacted in 1992, and its regulations became official in January 1, 1998. The California Register of Historical Resources is an authoritative guide used by state and local agencies, private groups, and citizens to identify the State's historic resources and indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.⁴ The criteria for eligibility for listing in the California Register are based upon National Register criteria. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, State, or national level, under one or more of the following criteria:

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

The California Register consists of properties 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 in the National Register and those formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register.

⁴ *California Public Resources Code, Section 5024.1(a).*

- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (Commission).
- Points of historical interest which have been evaluated by the OHP and recommended for listing by the Commission for inclusion in the California Register in accordance with criteria adopted by the Commission.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.⁵

(b) California Environmental Quality Act

CEQA requires a lead agency to analyze whether historic and/or archaeological resources may be adversely impacted by a project. Under CEQA, Public Resources Code Section 21084.1, a “project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.” This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historic resource. If so, the lead agency must determine whether the project may involve a “substantial adverse change in the significance” of the resource. CEQA Guidelines Section 15064.5 provides, for the purposes of CEQA compliance, the term “historical resources” shall include the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements in Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat such resources as significant unless the

⁵ *California Public Resources Code Section 4852.*

preponderance of evidence demonstrates that it is not historically or culturally significant.

- Any object, building, structure, site, area, place, record, or manuscript 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 may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 4852).

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

CEQA Guidelines Section 15064.5 also provides that “[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Material impairment occurs when a project materially alters or demolishes in an adverse manner “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” in the California Register or a local historic registry or that justify its eligibility for inclusion. As further set forth in CEQA Guidelines Section 15064.5, “[g]enerally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.” The Secretary of the Interior’s Standards (Standards) are not intended to be prescriptive, but instead provide general guidance. Not every Standard would necessarily apply to every aspect of a project, nor is it necessary to comply with every Standard to achieve compliance. For a project to comply with the Standards, it must achieve a balance of continuity and change. The Standards, as codified in 36 Code of Federal Regulations Section 67.7, 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 buildings, will not be undertaken.*
4. *Changes to a property that have acquired historic 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 will 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. *Significant archeological resources affected by a project will be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*
9. *New additions, exterior alterations, or related new construction will not destroy historic materials that characterize the property. The new work shall be differentiated from the old and will be compatible with the massing, size, scale, and architectural features to protect the historic 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.*

CEQA also considers project impacts to “a unique archaeological resource.” In accordance with CEQA, Public Resources Code Section 21083.2(g), a unique archaeological resource is defined as 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 of meeting any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or
- 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 [Public Resources Code Section 21083.2(g)].

CEQA requires the lead agency to consider whether a project would have a significant effect on unique archaeological resources or resources eligible for listing in the California Register of Historic Resources, and to avoid these resources when feasible or mitigate any effects to less than significant levels (Public Resources Code Section 21083.2 and Section 21084.1). CEQA Guidelines Section 15064.5(c)(4) notes that if an archaeological resource is neither a unique archaeological resource nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.

CEQA Guidelines Section 15064.5(e) provides procedures to be followed in the event of the accidental discovery of human remains. If remains are discovered, the county coroner shall examine the remains to determine the nature of the remains and cause of death. If the remains are determined to be of Native American origin, the county coroner shall contact the Native American Heritage Commission, which would then identify the person or persons it believes to be the most likely descendent(s) of the deceased Native American. The most likely descendent may make recommendations for the excavation work and for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. Under certain conditions, the landowner or his authorized representative may rebury the human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance. Native American burials in California are protected by Public Resources Code Sections 5097.9–5097.991 and Section 7050 of the Health and Safety Code.

Paleontological resources are also afforded protection under CEQA. Appendix G of the CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, which states, “a project will normally result in a significant impact on the environment if it will...disrupt or adversely affect a paleontological resource or site or

unique geologic feature, except as part of a scientific study.” Section 5097.5 of the Public Resources Code also specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for the unauthorized damage or removal of paleontological resources.

(c) California Health and Safety Code

Sections 7050.5, 7051, and 7054 of the California Health and Safety Code address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resources Code), and the disposition of Native American burials in archaeological sites. It protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes 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.

(d) Senate Bill 18

Government Code Section 65352.3 (Senate Bill 18) requires local governments to consult with California Native American tribes identified by the California Native American Heritage Commission prior to the adoption or amendment of a general plan, area plan or specific plan for the purpose of protecting traditional tribal cultural places. The State Office of Planning and Research’s technical advice series recommends that agencies solicit the concerns of Native Americans and other interested persons and corporate entities, including, but not limited to, museums, historical commissions, associates and societies as part of the process of cultural resources inventory.

b. Existing Conditions

(1) Historical Background

The existing 1,196-seat Amphitheatre was built in 1920 as the site of the *Pilgrimage Play*, a 12-part Passion Play depicting the life and death of Jesus Christ. Hence the original name of the Amphitheatre was the Pilgrimage Theatre. The author of the play, Christine Wetherill Stevenson, believed the rugged beauty of the Cahuenga Pass would provide a dramatic outdoor setting for the play. Together with Chauncey D. Clark and other investors, Wetherill Stevenson purchased the land on which the Hollywood Bowl now sits for the purposes of building a theatre. The other investors disagreed with Stevenson’s idea of building a theatre solely for religious productions; therefore, the investors acquired the land from Wetherill Stevenson. Stevenson then purchased the land across the Hollywood Bowl property. A wood amphitheatre was built on that site with the help of volunteers. Taking advantage of the box canyon, the stage was set against a natural backdrop of

chaparral and cypress growing up the hillside. The design and layout of the original amphitheatre was prepared by architect Bernard Maybeck.

H. Ellis Reed was hired to produce and direct the Pilgrimage Play, which was performed by local actors every summer from 1920 to 1929 until a brush fire destroyed the original wood structure. While attending Hollywood High School, Fay Wray appeared in the play. Other actors who performed at the Pilgrimage Theatre included Gale Gordon, Peggy Converse, Rachel Ames, and Addison Richards.

Wetherill Stevenson died in 1922, just two years after the play opened. An electrically illuminated cross was erected on the hill above the Amphitheatre and dedicated in her honor in 1923. After Wetherill Stevenson's death, *Los Angeles Times* owner Harry Chandler acquired his share of the property and performance rights to the Pilgrimage Play from her estate.

The present Amphitheatre was built on the same site as the original theatre and opened in 1931. The orientation of the seating area and location of the stage generally remained the same, and some of the original stone was incorporated into the new structure along the areas to the right and left of the seating area. The Amphitheatre is constructed of board-formed poured-in-place concrete and designed in the style of ancient Judaic architecture to resemble the gates of Jerusalem.

The architect of the existing Amphitheatre, William Lee Woollett, was born in Albany, New York and came from a long line of architects. Following in his father's footsteps, William Lee Woollett studied architecture at the Massachusetts Institute of Technology and after working for the Boston firm Femur and Page, he returned to Albany in 1896 to set up his own practice. After the fire and earthquake in San Francisco, William Lee went out to investigate the prospects of starting an office there in 1909. He stayed in California and later gained considerable recognition for his State Armories in San Francisco and Los Angeles, numerous schools, office buildings, theatres, and houses. William Lee Woollett's son, William Woollett, and grandson Joseph L. continue to practice architecture in California.

The Pilgrimage Play continued to be performed following the opening of the existing Amphitheatre in 1931, but was not performed during the 1938 season. Production of the Pilgrimage Play resumed in 1939 and continued to be performed until 1964, interrupted only by World War II, when the structure was converted to dormitories for servicemen.

Originally, patrons arrived to the Amphitheatre mostly by streetcar. As the number of patrons arriving by automobile transportation increased, improvements to driveways and parts of the grounds were re-graveled and re-surfaced. Schools, churches, civic

organizations, and other groups often purchased large blocks of tickets and made annual excursions to see the play together. The venue became even more accessible by automobile and bus when the Hollywood Parkway opened in 1940. Parking areas were also expanded at this time.

In 1941, the land was deeded to the County of Los Angeles. The Pilgrimage Play continued to be presented until a lawsuit in 1964 forced its closure because of its religious nature. Opponents argued that expending public funds on a religious play violated the principle of the separation of church and state.

The County continued to use the Amphitheatre for a variety of concerts and performances, but public attendance dwindled. The structure gradually deteriorated until the late County Supervisor John Anson Ford obtained funding for capital improvements, several decades ago. The Pilgrimage Theatre was renamed the John Anson Ford Amphitheatre in his honor by former County Supervisor Edmund D. Edelman. The Amphitheatre was used intermittently for Shakespearean plays, jazz concerts, and dance performances until former County Supervisor Edmund D. Edelman authorized the revival of the venue by the Los Angeles County Arts Commission with the creation of the Ford Amphitheatre Season (originally called "Summer Nights at the Ford") in 1993.

The indoor theatre space at the Ford Theatres was rented by Center Theatre Group, which made it the home of their second stage "Taper Too" from 1972 to 1997. In 1998, the space was extensively renovated and reverted to the County for use and was renamed [Inside] the Ford. Improvements were also made to the stage, backstage, and public areas of the Ford Theatres. Additional funds were spent between 1999 and 2000 to make the facility ADA (Americans with Disabilities Act) compliant. These improvements included an elevator for the three-level structure, the construction of the new entryway, and Edison Plaza.

(2) Architectural Description

The 32-acre Project Site, located in the Hollywood Hills on the east side of the Cahuenga Pass, consists of natural and man-made features, the largest of which is the 1,196-seat Amphitheatre. Other structures within the Project Site include the concessions building, the box office, and a post-war motel building that is used as office space for the Ford Theatre Foundation, Los Angeles County Arts Commission, and Los Angeles Philharmonic. Surface parking lots are also located off Cahuenga Boulevard East on the western edge of the Project Site. From the main entrance at Cahuenga Boulevard East and Pilgrimage Bridge, a road leads up to the Amphitheatre ending in a cul-de-sac. This road is lined with trees on the north and a sidewalk and a wrought iron fence on the south. The cul-de-sac includes handicapped parking spaces and a loading zone. The

landscaping within the Project is diverse, featuring a variety of native and non-native trees, grasses, and shrubs.

The entryway to the Amphitheatre from the south parking lot was constructed in 2000. It consists of winding paths that create a gradual climb from the box office up to the Amphitheatre, past a water feature, various species of trees and plants, and pocket picnic areas. The Amphitheatre generally has an east-west orientation and is situated in a box canyon. The seating area is on the west, while the stage and back stage area is to the east. The arched entrance is centered and recessed at the base of the outside wall. It is flanked by convex and concave concrete walls with different surface textures. These different surface textures are found throughout the structure. In some cases the boards used to form the concrete walls were laid vertically and in other cases they were laid horizontally. The mixture of the concrete is also inconsistent. In some cases it has a heavy aggregate and in other cases a fine one. Above the arched entrance is a pointed arched parapet. The pointed arched doorway on the inside wall has been closed. The door next to the arched entrance leads to the entry of the [Inside] the Ford Theatre.

Grand staircases are located on each side of the arched entrance that leads to the promenade level and entrance to the Amphitheatre seating. The one on the south marches up the outer wall, while the one on the north is situated between the inner and outer walls. The north staircase bifurcates to lead to the concessions building and the Amphitheatre lobby at Door A, while the south staircase leads to the Amphitheatre lobby at Door D. The back inside wall of the Amphitheatre seating area is interrupted by four heavy double wood paneled doors decorated with a recessed grill pattern. These doors are situated in rectangular openings and lead to the seating aisles. On the upper level is a stucco clad addition housing the projection booth and control room. On top of the stucco clad addition is a platform, accessible from a door and staircase on the inside of the addition, used for follow-spot operators and equipment. Also attached is a tall corrugated metal parapet wall running along the top of the Amphitheatre wall. The wall was added to reduce the sound from Cahuenga Boulevard and the Hollywood Freeway. These two major additions have not altered the original structure, but merely rest on top of the walls. The Amphitheatre seating consists of individual metal frame with plastic seat theatre type chairs and is not original. The north and south walls of the seating area are stepped downward towards the stage. The stage has upper and lower levels and is flanked by two elaborate two-story towers with crenellated parapets. These towers were added in 1945, the same time the stage was enlarged. Rustic stonework forms the foundation for the stage and the walls at the rear of the stage. The stone appears to be local, and the various colors, shapes, and size suggest that the walls were constructed and repaired over time. The hillside with stone retaining walls encloses the Amphitheatre on the east. The stone on the south side of the seating area may have been recycled from the 1920 structure.

The concession building, located near the cul-de-sac of the service road on the north side of the Amphitheatre was originally designed as the box office. It is a two-story building with a flat roof and stucco exterior. A shade structure is located on the north and west elevations where patrons place and receive orders from windows. Second story windows are covered by security bars. The box office, located just outside of the main entrance, east of the south surface parking lot, was originally designed as the caretaker's cottage. The box office is a one-story building with a flat roof and stucco exterior. The building has two levels, which is reflected in the stepped massing. The ticket windows are located on the north elevation and are covered by an awning.

c. Evaluation of Historic Eligibility

The Ford Theatres was evaluated as a potential historic resource in 1994 and determined eligible for listing in the National Register. As described above, properties that have been determined eligible for listing in the National Register are automatically included in the California Register. Properties that are listed in the California Register are considered to be historic resources subject to CEQA. Based on the date of the original evaluation 20 years ago and the changes that have been made to the property since the original evaluation, the Ford Theatres was re-evaluated to determine eligibility for listing in the National Register, as provided below.

As previously described, the post-war motel building, located northeast of the primary entrance from the Pilgrimage Bridge, is currently used as office space by the Ford Theatre Foundation, Los Angeles County Arts Commission, and the Los Angeles Philharmonic staff. A 1954 aerial photograph of the Project Site illustrates the motel is a remnant of a large motel complex that originally included two other buildings of equal size. Alterations to the former motel building include the replacement of doors, windows on the first story, and possibly the exterior cladding. Due to the alterations, this former motel building has no genuine potential to qualify as a historic resource.

(1) National Register of Historic Places

(a) Criterion A

To be eligible for the National Register under Criterion A, a resource must have a direct association with events that have made a significant contribution to the broad patterns of our history. The Ford Theatres is eligible for listing in the National Register under Criterion A at the local level in the context of the cultural history of Los Angeles. It is significant as one of the oldest performing arts sites in Los Angeles still in use. The Ford Theatres, like other theatres in Los Angeles, represents the personal vision of an individual on a quest to bring the performing arts to Los Angeles. Christine Wetherill Stevenson sought to promote open-air dramas focusing on the lives of great religious leaders. As the

founder of the Theater Arts Alliance in 1918, she spearheaded the search for a natural setting to build an amphitheatre to produce the plays. She and Mrs. Chauncy Clarke first purchased 65 acres that became the site of the Hollywood Bowl. After parting ways with the Theater Arts Alliance, she purchased the site across from the Hollywood Bowl, now the Project Site, and had constructed a wood amphitheatre. She hired director H. Ellis Reed to produce the drama of the *Life of Christ*, which she wrote herself. The play opened in 1920 and was performed every summer until 1964, with only brief interruptions. Although Wetherill Stevenson died in 1922, the Amphitheatre she created lived on. The period of significance for this context would be 1931 when the new Amphitheatre was constructed through 1964 when the Pilgrimage Play ceased production.

(b) Criterion B

To be eligible for listing in the National Register under Criterion B, a property must be associated with the lives of persons significant in our past. Many persons have worked, performed, and attended the Ford Theatres since it was constructed. There are two individuals with a close association with the Amphitheatre: Christine Wetherill Stevenson and former County Supervisor John Anson Ford. The Amphitheatre would not be considered significant for its association with Wetherill Stevenson because she died in 1922, and thus, did not play a part in the design or construction of the existing Amphitheatre, although the play she wrote was performed there for decades. While John Anson Ford was instrumental in revitalizing the Amphitheatre, his efforts took place too recently to be considered historically significant. Therefore, the Ford Theatres is ineligible for listing in the National Register under Criterion B.

(c) Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction. The Ford Theatres was constructed of board-formed poured-in-place concrete, which was a popular method of construction during the Great Depression. Therefore, the Amphitheatre would not be significant for its method of construction because it was neither innovative nor unique. However, as one of only five outdoor theatres in Los Angeles remaining from the early 20th century, the Ford Theatres is significant as a type. Specifically, the Ford Theatres embodies the distinguishing characteristics of a type—an early 20th century amphitheatre—in its overall plan, sequencing of spaces, concrete walls and support system, monumental main entrance and staircases, minimal ornamentation, open-air seating, and stage area that blends into the canyon.

The Amphitheatre is also significant for its association with the architect William Lee Woollett. Woollett was known for his flamboyant approach to ornament and rather liberal

view of architectural historicism. His best-known extant work is his collaboration with Albert C. Martin on the Million Dollar Theater (1918). This was the first building he designed after moving to Los Angeles from San Francisco. He also designed interior murals for the Paramount Theater (1920), prepared plans for the Santa Monica Pier Amusement Company to reflect Pompeian architecture, and designed a theatre in Venice. An artist as well, Woollett's non-architectural works included murals, set designs, and sculptures. He often wrote articles about architecture and urban planning in trade magazines and professional journals. Active in civic affairs, he was appointed to the Municipal Arts Commission in 1933 and helped draft the Cultural Heritage Ordinance in 1962. The Cultural Heritage Ordinance established the Cultural Heritage Commission, and Woollett became the founding president. Woollett is considered a master for the quality of his work and for his contributions to the profession. The Ford Theatres represents one of his larger and more prominent commissions. The corbelled arches and crenellated parapets prominently displayed reflect a free and largely speculative interpretation of the architecture of the Holy Land.

(d) Criterion D

Criterion D was not considered as it generally applies to archaeological resources.

(e) Integrity

As discussed above, to be eligible for listing in the National Register, properties must retain their physical integrity from the period in which they gained significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the period of significance is usually measured by the length of the associations. As such, the period of significance for the Ford Theatres is 1931 to 1964; the year the building was constructed through the period when the Pilgrimage Play was still performed. While some factors of integrity are more important than others, depending on the property, a majority of the seven recognized factors should be retained. The Amphitheatre retains its integrity of location, materials, workmanship, feeling, and association. Its integrity of setting and design has been diminished by changes that post-date the period of significance; however, they are still adequate. Overall, the Amphitheatre retains sufficient integrity to convey its significance as follows:

- *Location—The place where the historic property was constructed or the place where the historic event occurred.*
 - The Ford Theatres has not been moved. Therefore, its integrity of location has been retained.
- *Setting—The physical environment of the historic property.*

- The vast majority of the 32-acre Project Site has not been improved. The surrounding hillsides continue to be covered with native and non-native trees, shrubs, and grasses that blend into the neighboring landscape. Surface parking lots and driveways have been enlarged, paved, and repaved; however, they are concentrated on the west side of the Project Site and are visually disconnected from the Amphitheatre. The entryway to the Amphitheatre from the south parking lot, constructed in 2000, represents the most significant change to the setting since 1964. Historic photographs depict a long, wide, nearly straight flight of steps to the front of the Amphitheatre. The new winding paths and landscaping create a more organized and formal approach that did not exist historically. Therefore, the overall integrity of setting is low.
- *Materials—The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.*
 - Most of the changes to the Amphitheatre since 1964 have involved the addition, not the removal of, materials. The original poured-in-place concrete walls and support system and wood doors and screens are still present. Some wood doors have been replaced; however, the new doors are identical to the old doors. Since the key materials remain, the integrity of materials has been retained.
- *Design—The combination of elements that create the form, plan, space, structure, and style of a property.*
 - A number of alterations to the Amphitheatre since 1964 have muddled the design. These include the new entryway and elevator in the front and the sound walls along the upper level and sides of the seating area. However, the 1931 fabric remains remarkably distinguishable from these later additions because it is characterized by the poured-in-place concrete walls and support system that remain evident throughout the stage, house, and seating area. Furthermore, the reoccurring design motifs, based upon the architecture of the Holy Land, including the heavy wood doors and screens, pointed arched openings, and religious symbols are still present and visible. Therefore, the integrity of design is fair.
- *Workmanship—The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.*
 - The techniques used in the construction of the Amphitheatre are in full display. The boards and different types of concrete used in the construction of the building can be seen in the textures and patterns on the walls. The hand-chiseled wood doors and screens reveal the workmanship of the carpenters who created them. However, it must be noted that the doors are mostly reproductions. While the original design and material has been

preserved, the workmanship from the period no longer remains. However as a whole, the integrity of workmanship in the Amphitheatre is sufficient.

- *Feeling—A property’s expression of the aesthetic or historic sense of a particular period of time.*
 - This aspect of integrity is the most difficult to assess because it depends on individual perceptions. It results from the presence of physical features that, taken together, convey the property’s historic character. Therefore, the Ford Theatres retains its integrity of feeling, because it still feels like an Amphitheatre from the 1930s.
- *Association—The direct link between an important event or person and a historic property.*
 - The Amphitheatre is associated with a pattern of events, the history of the performing arts in Los Angeles. The key features from the period of significance remain, including the poured-in-place concrete structure and support system, basic plan of the building, seating area, and stage. Therefore, the Amphitheatre retains its integrity of association.

(2) California Register of Historical Resources

As described above, the criteria for eligibility for listing in the California Register are based upon National Register criteria. In addition, properties that have been determined eligible for listing in the National Register are automatically included in the California Register. Therefore, the Ford Theatres is also eligible for listing in the California Register for the same reasons noted above.

(3) Character–Defining Features

Character-defining features are the architectural components that contribute to a building’s sense of time and place. National Register *Preservation Brief #17: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character* states:

A complete understanding of any property may require documentary research about its style, construction, function, its furnishings or contents; knowledge about the original builder, owners, and later occupants; and knowledge about the evolutionary history of the building. Even though buildings may be of historic, rather than architectural significance, it is their tangible elements that embody its significance for association with specific events or persons and it is those tangible elements both on the exterior and interior that should be preserved.

The character-defining features of buildings can be generally grouped into three categories: the overall visual character of a building, the exterior materials and craftsmanship, and the interior spaces, features, and finishes. The relative importance of character-defining features depends on the level of craftsmanship, visibility, and integrity. In addition, some character-defining features are more important than others in conveying the significance of the building.

The Ford Theatres is significant in the cultural history of Los Angeles, specifically the performing arts, at the local level. It also exemplifies the outdoor theatre movement as an excellent example of an early 20th century amphitheatre. The period of significance of the property is 1931 to 1964; the year the Amphitheatre was constructed through the period when the Pilgrimage Play was still performed. A review of the character-defining features of the Ford Theatres is provided in Table I of the Historic Resource Report included in Appendix F of this Draft EIR. Features which are determined to be character-defining features of the Ford Theatres are described as either “primary” or “secondary” character-defining features. Primary character-defining features are considered the most important elements contributing to the significance of the property, while secondary features are considered less important.

As listed in Table I of the Historic Resource Report, primary character-defining features of the Ford Theatres include the following:

- Plan—The overall plan of the Amphitheatre and the sequencing of the spaces are primary character-defining features because they are original and essential elements of the Amphitheatre.
- Materials—As the poured-in-place concrete construction is typical of the era during its construction, the concrete found in the Amphitheatre is a primary character-defining feature. The charcoal stone along the south wall of the seating area is also a primary character-defining feature as it was likely salvage from the 1920 amphitheatre structure that was destroyed by fire, and used in the construction of the existing Amphitheatre in 1931.
- Stone—The original stone was used in the construction of the existing Amphitheatre in 1931 along the north wall of the seating area, the stairs on the stage, and the retaining walls and stairs behind the stage. This stone is still present and appears to have been quarried from the Project Site. It is a primary character-defining feature because it was added during the period of significance and is highly visible.
- Staircases—The north and south staircases near the main entrance are primary character-defining features because they are original and key design elements that contribute to the monumental feeling of the Amphitheatre.

- Wood Doors (original)—The original wood doors are primary character-defining features because they are original, exhibit craftsmanship from the period, and are key design elements.
- Wood Screens—The wood screens are primary character-defining features because they are original, exhibit craftsmanship from the period, and are key design elements.
- Seating Area—The open-air seating area is a primary character-defining feature because it is an essential element of the Amphitheatre.
- Main Stage—The main stage is a primary character-defining feature because it is an essential element of the Amphitheatre.
- Stage Left and Right Towers—The stage left and right towers were constructed in 1945. They are primary character-defining features because they were constructed during the period of significance and are essential elements of the Amphitheatre.

Secondary character-defining features of the Ford Theatres include the following:

- Wood Doors (reproduction)—The double wood doors to the seating area and stage towers, as well as others, were reproduced. They are secondary character-defining features because they maintain the historic design, but not the historic workmanship.
- Religious Symbols—Religious symbols, including crosses in concrete relief, are secondary character-defining features because they are original, but minor design elements.
- Concession Building—The concession building is a secondary character-defining feature. Although it was constructed during the period of significance, it has been altered. Therefore, only the height, shape, massing, flat roof, stucco exterior, and second-story windows are considered character-defining features. The interior, service windows on the north elevation, or surrounding pergola are not considered character-defining features.
- Box Office—The box office is a secondary character-defining feature. Although it is an original element of the Amphitheatre, it has been altered. Therefore, only the height, shape, massing, flat roof, and stucco exterior are considered character-defining features. The interior or box office windows on the north elevation are not character-defining features.

d. Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. On January 15, 2014, a cultural resources records search was conducted through the South Central Coastal Information Center located at the California State University, Fullerton. The results of the records search, which is included in Appendix G of this Draft EIR, indicate there are no known archaeological sites or isolates, which are artifacts not associated with an archaeological site, located within a 0.5-mile radius of the Project Site or within the Project Site. The records search notes that this does not preclude the potential for an archaeological site to be identified during activities associated with the Project.

e. Paleontological Resources

Paleontology is the study of fossils, which are the remains of ancient life forms. On January 27, 2014, a project-specific paleontological records search was conducted through the Natural History Museum of Los Angeles County. The results of the paleontological records search, which is included in Appendix G of this Draft EIR, indicate there are no known vertebrate fossil localities located within the Project Site.

As detailed in the paleontological records search, much of the Project Site has exposures of intrusive or volcanic basaltic igneous rocks that would likely not contain any fossils. Placed between the igneous rocks are exposures of the marine middle Miocene Topanga Formation (also referred to in this area as the Middle Topanga Formation). The closest known vertebrate fossil locality in the Topanga Formation is located approximately 2.1 miles northwest of the Project Site. Locality LACM 1084 documents the occurrence of *Paleoparadoxia*, a member of an extinct group of peculiar marine mammals called the Desmostylia. Approximately 2.8 miles northwest of the Project Site is an additional Topanga Formation vertebrate fossil locality, LACM 6969, which was collected during construction of the Metrorail Universal City subway station. Locality LACM 6969 produced a fossil fish fauna containing specimens of grunion, Atherinidae, herrings, *Etringus*, *Ganolytes*, and *Sardinella*, codlets, Bregmacerotidae, bigeyes, Priacanthidae, croakers, Sciaenidae, mackerels, Scombridae, and boarfishes, Caproidae.

3. Environmental Impacts

a. Methodology

The Project's Historic Resource Report provided in Appendix F is based in part on a review of previous historic evaluations, field inspections, archival research, and analysis of historic photographs and maps. Based on the regulations and criteria summarized above,

the Historic Resource Report assessed the significance, integrity, period of significance, and character-defining features of the property. As previously described, under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historically significant resource or resources, and if so; (2) a determination of whether the project will result in a “substantial adverse change” in the significance of the resource or resources. While compliance with the Secretary of the Interior’s Standards (Standards) generally results in a less than significant impact on historic resources under CEQA, noncompliance does not necessarily equal the material impairment of historic resources. Historic resources can continue to retain sufficient integrity to convey their significance, even if they are altered in a manner that does not comply with the Standards. Thus, the analysis of Project impacts was based on whether the Project complies with the Standards and whether the Project would affect the integrity of the Ford Theatres and therefore its eligibility for inclusion in the California Register.

To address potential impacts associated with archaeological and paleontological resources, formal records searches were conducted to assess the archaeological and paleontological sensitivity of the Project Site and vicinity. In addition, an evaluation of existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were used to determine the potential for uncovering archaeological and paleontological resources.

b. Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, Project impacts with regard to cultural resources would be significant if the Project would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of formal cemeteries.

c. Project Design Features

No specific project design features are proposed with respect to cultural resources.

d. Analysis of Project Impacts

(1) Historic Resources

(a) *Potential Impacts Related to Previously Approved Amphitheatre Improvements*

As described in Section II, Project Description, of this Draft EIR, in September 2013, the County of Los Angeles prepared and approved a Notice of Exemption pursuant to CEQA Guidelines, Article 19, Section 15331, Historical Resource Restoration/Rehabilitation (Class 31) for the rehabilitation of portions of the existing Amphitheatre consistent with the Secretary of Interior Standards for the Treatment of Historic Properties. These improvements will include hillside stabilization, stage reconstruction, disabled access and code compliance improvements, theatrical systems infrastructure improvements, and mechanical and electrical systems upgrades. These improvements were documented independently to be in compliance with the Class 31 exemption for historic resource rehabilitation consistent with the Secretary of Interior's Standards. Therefore, no significant impacts with regards to historic resources would occur as a result of implementation of the previously approved Amphitheatre improvements.

(b) *Potential Impacts Related to Other Improvements*

(i) *Amphitheatre*

The other proposed Amphitheatre improvements, including the replacement of the existing projection booth and control room and existing lighting positions, and the addition of a new sound wall and retractable shade structure would be consistent with the historic use of the Amphitheatre (Standard #1) and would not involve the removal of any primary character-defining features (Standard #5). In addition, these improvements would be clearly differentiated from the original concrete structure (Standard #9) and could be removed in the future without negatively impacting the original concrete structure (Standard #10).

With regard to the integrity of the Ford Theatres, the proposed Amphitheatre improvements would provide for the return of the walkway at the Amphitheatre level to its original condition, which is currently obstructed by an access stair that would be removed as part of the Project. Further, while the proposed Amphitheatre improvements would be visible, such improvements would be behind the audience during performances and would not affect the way performances are experienced. Covered in sound absorbent panels, these improvements would also present a fairly plain and neutral backdrop for the historic architecture. Additionally, a screen of semi-transparent panels proposed to be provided outside of the seating area would have a lighter feel than the existing corrugated metal. As

such, the integrity of the Ford Theatres would be retained with implementation of the proposed Amphitheatre improvements.

Based on the above, there will be no substantial adverse change in the significance of the Ford Theatres as a historic resource from this component. However, due to the fluid nature of the architectural design until the approval of final design plans, impacts with regards to historic resources associated with the proposed Amphitheatre improvements could be potentially significant. Therefore, Mitigation Measure E-1 is provided below to ensure compliance with the Standards. With implementation of Mitigation Measure E-1, potentially significant impacts would be reduced to a less than significant level.

(ii) Ford Terrace

As this component of the Project primarily involves new construction, the most applicable Standards are #9 and #10. Given the fluid nature of the architectural design until the approval of final plans, it is difficult to ascertain the compatibility between the new construction and the historic Amphitheatre. Therefore, Mitigation Measure E-1 is provided below to ensure compliance with the Standards.

With regard to character-defining features, implementation of the Ford Terrace improvements would not involve the removal of any primary character-defining features. In addition, while the proposed improvements would require removal of the concessions building, which is a secondary character-defining feature, such removal would not in and of itself constitute an impact on a historic resource because the concessions building does not have any significance separate and apart from the Amphitheatre.

As it pertains to the integrity of the Ford Theatres, the proposed Ford Terrace improvements would have a minimal visual impact on the Amphitheatre from within the seating area given the intervening structures and would not affect the way performances are experienced within the Amphitheatre. Further, the repurposing of the existing [Inside] the Ford Theatre would not negatively affect the integrity of the Ford Theatres as it would not involve the alteration or removal of any character-defining features. Overall, removal of the concessions building and implementation of the Ford Terrace improvements would further diminish the integrity of setting of the Ford Theatres.

In summary, while the existing Amphitheatre would be altered due to the removal of the concession building and the proposed construction, the Ford Terrace improvements are not anticipated to result in a substantial adverse change in the significance of the Ford Theatres as a historic resource as it would continue to be eligible for listing in the California Register. However, due to the fluid nature of the architectural design until the approval of final design plans, impacts with regards to historic resources associated with the proposed

Ford Terrace improvements could be potentially significant. Therefore, Mitigation Measure E-1 is provided below to ensure compliance with the Standards. With implementation of Mitigation Measure E-1, potentially significant impacts would be reduced to a less than significant level.

(iii) Ford Plaza

The proposed Ford Plaza would comply with Standard #9 since the proposed improvements would not destroy any historic materials, would be clearly distinguishable as new, and would be appropriately scaled to the Project Site. The proposed improvements would also comply with Standard #10 because they could be removed in the future without negatively impacting the historic resource. Within the area of the proposed Ford Plaza, the existing box office has been identified as a secondary character-defining feature. While the box office is an original element of the Amphitheatre, it has been altered. Therefore, only the height, shape, massing, flat roof, and stucco exterior are considered character-defining features. The interior or box office windows on the north elevation are not considered character-defining features. As part of the Ford Plaza improvements, the box office would be repurposed as a museum, which could potentially affect the character-defining features of the box office.

With regard to the integrity of the setting of the Ford Theatres, the Ford Plaza would represent an increase in the utilization of the property. Therefore, while the Project Site would primarily comprise undeveloped open space, the Ford Plaza would further diminish the integrity of setting and would compromise the integrity of feeling of the Ford Theatres from a singular cultural venue to a larger cultural and recreational destination.

Based on the improvements proposed as part of the Ford Plaza, it is not anticipated that such improvements would result in a substantial adverse change in the significance of the Ford Theatres as a historic resource. However, due to the fluid nature of the architectural design until the approval of final design plans, particularly the proposed design of the repurposed box office, impacts with regards to a historic resource could be potentially significant. Therefore, Mitigation Measure E-1 is provided below to ensure that any alterations to the box office comply with the Standards. With implementation of Mitigation Measure E-1, potentially significant impacts would be reduced to a less than significant level.

(iv) Transit Center

As this component of the Project involves new construction, the only applicable Standards are #9 and #10. Due to the distance between the proposed Transit Center and the Amphitheatre, the requirement for compatibility between the new and old (Standard #9) and the concept of reversibility (Standard #10) rooted in these two Standards is not

paramount. Notwithstanding, the design of the Transit Center would be differentiated from the original Amphitheatre construction and such improvements could be removed without affecting the Amphitheatre. The north parking lot and former motel building proposed to be removed as part of this component are not character-defining features of the Ford Theatres. In addition, as described above, the former motel building has no genuine potential to qualify individually as a historic resource

The proposed Transit Center improvements would not negatively affect the integrity of the Ford Theatres due to the area's proximity to Cahuenga Boulevard and the Pilgrimage Bridge, the relatively flat topography, and the fact that it is visually disconnected from the historic Amphitheatre.

Based on the above, the proposed Transit Center improvements would result in a less than significant impact to a historic resource and no mitigation measures are required.

(v) Hiking Trail

None of the Standards are applicable to the area of the proposed hiking trail because there are no character-defining features in this portion of the Project Site that are related to the historic significance of the Ford Theatres. In addition, the trail would not be visually intrusive or reduce the integrity of the Ford Theatres. Therefore, no significant impacts with regards to historic resources would occur from this component and no mitigation measures are required.

(c) Summary of Potential Impacts to Historic Resources

Overall, impacts with regards to historic resources associated with the Project have the potential to be significant as the specific design details of the Project have not been finalized. However, with implementation of Mitigation Measure E-1, provided below, such impacts would be reduced to a less than significant level.

(2) Archaeological Resources

As previously described, the results of the records search indicate there are no known archaeological sites or isolates located within a 0.5-mile radius of the Project Site or within the Project Site. While the majority of the Project would be developed within areas that have been subject to disturbance in the past, some portions of the Project would extend to previously undisturbed areas. As such, there is the possibility that archaeological resources could be discovered. Without mitigation measures, impacts associated with archaeological resources could be potentially significant. However, with implementation of Mitigation Measures E-2 and E-3, provided below, potential impacts related to archaeological resources would be reduced to a less-than-significant level.

(3) Paleontological Resources

As described in the paleontological records search included in Appendix G of this Draft EIR, excavations in the igneous rocks exposed in much of the Project Site would not uncover any recognizable fossils. However, excavations in the Topanga Formation deposits intercalated with the igneous rocks may encounter significant vertebrate fossils. Therefore, the potential exists for paleontological resources to be uncovered during construction activities and impacts associated with paleontological resources could be potentially significant. Without mitigation measures, potential impacts associated with paleontological resources could be potentially significant. However, with implementation of Mitigation Measure E-4, any potential impacts related to paleontological resources would be reduced to a less than significant level.

4. Cumulative Impacts

As provided in Section III, Environmental Setting, of this Draft EIR, there are 27 related projects located within approximately one and one-half mile of the Project Site. Collectively, the related projects near the Project Site involve a variety of residential (e.g., condominiums, apartment), office, mixed-use, commercial, retail, restaurant, and institutional uses, consistent with existing uses in the area.

While impacts to historic resources tend to be site-specific, a cumulative impact analysis of historic resources determines whether the impacts of a project and the related projects in the surrounding area, when taken as a whole, would substantially diminish the number of historic resources within the same or similar context or property type. Specifically, cumulative impacts would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context as resources associated with the Project.

As previously evaluated, potential impacts to historic resources associated with the Project would be less than significant with implementation of Mitigation Measure E-1. As also discussed, the Ford Theatres is eligible for listing in the National Register under Criterion A as one of the oldest performing arts sites in Los Angeles still in use, and eligible under Criterion C as one of only five outdoor theatres in Los Angeles remaining from the early 20th Century. Based on the unique use and features of the Project Site as well as the area of the related projects, it is not expected that the related projects would impact historic resources of the same character (based on context, building type, evaluation, and designation) as that which is present within the Project Site. In addition, due to the distance of the related projects to the Project Site, the closest of which is approximately 0.8 mile from the Project Site (Related Project No. 22), the related projects are not

anticipated to impact the historic features within the Project Site. Therefore, cumulative impacts on historic resources would be less than significant.

As discussed above, potential impacts to archaeological and paleontological resources associated with the Project would be less than significant with implementation of Mitigation Measures E-2 through E-4. With regard to potential cumulative impacts related to archaeological and paleontological resources, the related projects area is urbanized and has been disturbed and developed over time. As with the Project, in the event that archaeological and paleontological resources are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering archaeological and paleontological resources. Thus, cumulative impacts associated with archaeological and paleontological resources would be less than significant.

5. Mitigation Measures

Mitigation Measure E-1: To ensure that the Project is consistent with the Standards and prior to the issuance of building permits for new construction, the final architectural plans shall be reviewed and approved by a qualified professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61.

Mitigation Measure E-2: If a unique archaeological resource is discovered during Project construction activities, work in the area shall cease and deposits shall be treated in accordance with applicable federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. In addition, if it is determined that an archaeological site is a historical resource, the provisions of Section 21084.1 of the Public Resources Code and CEQA Guidelines Section 15064.5 shall be implemented.

Mitigation Measure E-3: If human remains are encountered during construction, work in the affected area and the immediate vicinity shall be halted immediately. The construction manager at the Project Site shall be contacted, and shall notify the County Coroner. If the County Coroner determines the remains to be Native American, the archaeologist and Native American monitor shall then be contacted, if they are not on-site at the time, as well as the responsible lead agency of the discovery, who in turn shall notify the Native American Heritage Commission. Disposition of the human remains and any associated grave goods shall be in accordance with California Health and Safety Code Section 7050.5 and Public Resources Code Sections 5097.91 and 5097.98, as amended. The archaeologist and

the Native American monitor, with the concurrence of the County, shall determine the area of potential impact and the timing when construction activities can resume.

Mitigation Measure E-4: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site where excavations into the Topanga Formation may occur. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. If paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report, and a copy of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

6. Conclusion

As evaluated above, potential impacts to the on-site historic resource would be reduced to a less than significant level with implementation of Mitigation Measures E-1, which would ensure that the Project design complies with the Standards. In addition, following implementation of the Project in accordance with the applicable Standards, the integrity of the Ford Theatres as a whole would be sufficient to convey its historical significance. Therefore, the Ford Theatres would continue to be eligible for listing in the National Register and the California Register and the significance of the historic resource would not be materially impaired by the Project.

With implementation of Mitigation Measures E-2 and E-3, as set forth above, impacts to archaeological resources would be reduced to a less than significant level. With

implementation of Mitigation Measure E-4, potential impacts to paleontological resources would be reduced to a less than significant level.