



ATTACHMENT NO. 10

Appendix F

Historic Designation Letter



ARCHITECTURAL RESOURCES GROUP

Architects, Planners & Conservators, Inc.

July 29, 2009

Ms. Christine Byers
Public Art & Historic Preservation Coordinator
City of Culver City
9770 Culver Blvd.
Culver City, CA 90232

Re: 9814 Washington Boulevard
Project # 06096

Dear Ms. Byers:

Purpose

This letter has been prepared for the City of Culver City in response to an initial request, received on July 6, 2009, for a professional opinion regarding a property's eligibility for historic designation. The subject building is located at 9814 Washington Boulevard in Culver City.

This information represents Architectural Resources Group's (ARG) best professional opinion with regard to the subject property's potential eligibility for individual historic designation. It does not constitute a full review under the California Environmental Quality Act (CEQA) nor has this property been documented according to California Office of Historic Preservation guidelines (DPR 523 Forms) as part of this scope of work. This report examines the property at 9814 Washington Boulevard exclusively as an individual resource and does not draw any conclusions with regard to its potential eligibility as a contributor to any historic district, either geographic or thematic.

Methodology

The methodological approach for this property evaluation consisted of a site visit and limited historical property research. The site visit was conducted on July 9, 2009 by ARG, accompanied by City staff. The exterior and interior of the property were photographed. Site-specific historical property research was conducted through the Los Angeles Public Library (LAPL) online databases, County of Los Angeles Tax Assessor Information and historic Culver City/Palms telephone directories. ARG consulted with a local historian for additional background information about the building. City staff conducted limited permit research for the subject building and surrounding properties.

Principals

BRUCE D. JUDD, FAIA

STEPHEN J. FARNETH, FAIA

TAKASHI FUKUDA

AARON JON HYLAND, AIA

NAOMI O. MIROGLIO, AIA

DAVID P. WESSEL, AIC

Senior Associates

DEBORAH J. COOPER, AIA

GEE HECKSCHER, AIA

WENDY HILLIS, AIA

KATE JOHNSON, AIA

M. BRIDGET MALEY

CATHLEEN A. MALMSTRÖM, AIA

GLENN DAVID MATHEWS, AIA

NINA PASCALE

Offices

SAN FRANCISCO

PASADENA

SEATTLE

Southern California Office

65 N. Raymond Avenue

No. 220

Pasadena, California

91103

email arg@arg-la.com

626.583.1400

fax 626.583.1414

www.arg-la.com

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Previous Evaluations

This property is not currently individually listed on the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR). The property does not appear on the State of California's Historic Resources Inventory (HRI).

The property at 9814 Washington Boulevard was included in the Culver City Historical Survey completed in 1987. At this time it was given a B- rating, which translates as follows:

“B” Buildings: This category includes buildings which are not architecturally distinctive or historically significant enough to be considered for the National Register, but which maintain a local importance.

The 1987 Historical Survey statement of significance for 9814 Washington Boulevard stated that the building “served as the office and home of Dr. George Hays, and his wife, Edith, in the 1930s.” It also listed a construction date of 1928. A Dr. Hays was not identified in current research completed for this evaluation (a Dr. G. H. Ham was listed as living at the address in a 1937 Culver City/Palms City Directory). Additionally, according to the Los Angeles County Office of the Assessor, the date of construction is 1921.

In 1990, the Culver City Historic Preservation Advisory Committee (HPAC) Report was completed as a follow-up to the 1987 survey. The 1990 HPAC Report listed 124 structures, which were ranked either “Landmark,” “Significant,” or “Recognized.” No. 9814 Washington Boulevard was not included in this 1990 document.

The property was not at that time, nor has it since been, listed as a City of Culver City Cultural Resource.

Property Description

The subject building is located at 9814 Washington Boulevard, in downtown Culver City. The property is located on a triangular-shaped block bound by Washington Boulevard to the north, Culver Boulevard to the south, and Duquesne Avenue to the west. It fronts north onto Washington Boulevard. The rear, or southern, part of the property, which backs onto Culver Boulevard, is currently used by the Kirk Douglas Theatre (historically the Culver Theater) as a utility yard. There is a shed in this rear yard which is not historically associated with the subject property. This utility yard is surrounded by a high concrete perimeter wall, which is also not historically associated with the subject property.

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The building at 9814 Washington Boulevard was constructed in 1921. Its original address was 6930 Washington Boulevard; the address appears to have been changed to 9814 by the late 1920s. Originally constructed as a single-family dwelling, the building has been used as a combination residence and doctor's office since at least the early 1930s. At the time of its construction, the block on which the building is located was comprised mainly of single- and multi-family residences. By 1950, all buildings except for 9814 Washington had been demolished and commercial and institutional buildings had been constructed in their places.

The subject building is a two-story dwelling constructed in the Tudor Revival style. It has an irregularly-shaped plan with a projecting single-story bay dominating the front façade. The building, which sits on a concrete slab foundation, is wood frame and clad with non-textured stucco. It is covered by a multiple-gabled jerkinhead hipped roof with false rolled eaves. The roof, which is steeply pitched, is clad with composition shingles, and a small pipe chimney is located at the roof slope.

The main entrance is located at the north-facing façade and is sheltered by a non-original metal awning with metal supports. A metal security door obscures the historic single wood door. A secondary entrance consisting of multi-paned French doors is located at the east side of the main façade. The projecting bay at the front façade features a large fixed multi-pane wood window. This window has been topped with a non-original metal awning. Nearly all other windows have been replaced with jalousie windows; only a few of the original double-hung wood windows remain. The glazing in all windows has been painted dark grey, and all windows feature stucco sills. A small mount for a sign is located at the main façade, near the entrance; the sign itself has been removed.

The building is fronted by a small, well-kept yard with a lawn and various shrubs and mature trees. Concrete steps and a concrete walkway lead from the sidewalk to the main entrance. The property is surrounded by a tall, non-historic steel fence at its north and east boundaries.

The building's interior retains much of its historic fabric, such as built-in cabinets, moldings, countertop and backsplash tile in the kitchen, and a decorative arched niche at the front foyer. However, the building has been used by the Culver City Fire Department in recent years as a practice space and the interior is in a state of advanced disrepair with considerable water damage and holes in walls and ceilings.

Alterations to the building's exterior include the replacement of a large number of original windows with jalousie windows, the installation of metal awnings at the front window and main entrance, and security bars at some windows. A small

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projecting second-story room addition was constructed at the south (rear) façade (date unknown). The rear yard has been altered, as historic parking spaces and carports have been removed and replaced with a shed and utility equipment associated with the Kirk Douglas Theatre.

The building appears to be in fair condition.

Site-specific Information and General Historic Context

Date of Construction

The original building permit for this property could not be located within the City of Culver City's Planning and Building & Safety files. County of Los Angeles Tax Assessor Records show a construction date of 1921 for the subject building, which corresponds with Sanborn Company Fire Insurance Maps for the site (the building is present in the 1924 map).

Subsequent permits for the subject property include:

1975: Construction of a carport at the rear of the property

1980: Re-roof main house

1994: Installation of pipe vent at roof slope (replaced original chimney)

Architect

The architect of this building is unknown based on information available as part of this review.

Original owner

The original owner of this building is unknown based on information available as part of this review. The earliest owner of record appears to be a Clarence Montgomery Knox, who lived at the address as early as 1925. Mr. and Mrs. Knox lived at 9814 Washington until the former's death in 1930.

Subsequent owners/tenants include Dr. G. H. Ham (1930s), Dr. Richard Beem (1940s) and Dr. Julius Paskan. Dr. Paskan lived and operated his medical practice at 9814 Washington Blvd. from circa 1945 until 2003, partnering in the early 1940s with Dr. Beem.

Eligibility Evaluation

Determinations of historical and architectural significance require the consideration of several issues. Factors of significance include the property's history, in terms of both construction and use; the history of the surrounding community; the potential for important persons or uses to be associated with the property; the number of resources associated with the property; the potential for the resource to be the work

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of a master architect, builder, craftsman, landscape gardener or artist; historical, architectural, or landscape influences that shaped the design of the property; the property's pattern of use; alternations that have taken place over the years and how any changes have affected the historical integrity of the property; and the current condition of the property. These issues must be addressed before a final determination of significance can be made.

Criteria of Evaluation

CEQA requires that resources be evaluated using the California Register criteria. The California Register criteria are modeled after the NRHP criteria.

Once a resource has been identified as significant and potentially eligible for the California Register, its historic integrity must be evaluated. Integrity is the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity involves several aspects including location, design, setting, material, workmanship, feeling and association. These aspects closely relate to the resource's significance and must be intact for National or California Register eligibility. However, the California Register maintains a lower threshold of integrity than does the National Register.

Application of Eligibility Criteria

California Register of Historical Resources

Criterion 1: Events or Patterns of Events

It is associated with events or patterns of 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.

No. 9814 Washington Boulevard does not appear to be individually eligible under Criterion 1 at the local level. Little archival information could be located about the building itself. Although originally constructed as a single-family residence, it was used as a combined residence/medical office for much of its history (early 1930s until circa 2003).

At the time of its construction, 9814 Washington Boulevard shared the block with a variety of other property types, including single-family residences, multi-family residences and small commercial buildings. The Pacific Electric streetcar lines traversed Venice and Culver Boulevards; at the time of its construction, the rear of the subject property backed directly onto the Culver Boulevard streetcar right of way. This was a transformational time for downtown Culver City, which matured as a

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commercial center in the 1920s. The nature of the block on which 9814 Washington Boulevard is located changed quickly in ensuing years; the flatiron-shaped Washington Building (which is listed on the National Register) was constructed in 1926 to house the local post office, and also in 1926 a small hospital building was constructed next door (to the east) to the subject building. The Culver Theater was constructed directly west of the subject building in 1947, and by 1950 the entire block (which was bisected by Duquesne Avenue sometime in the 1930s) was commercial and institutional in nature. The subject property does not appear to be significant for its association with events or patterns of events related to the development of downtown Culver City.

The 1937 telephone directory lists physicians at 9722, 9812 and 9814 Washington Boulevard, all of which are located on the same block. The construction of the small hospital at 9812 Washington Boulevard in 1926 was likely the impetus for doctors to open their private practices nearby. Research did not reveal that 9814 Washington Boulevard is significant for its association with the medical field in Culver City, nor does it appear that it was host to events or medical advancements that have made a significant contribution to this pattern of history of the area.

Criterion 2: Important Person(s)

It is associated with the lives of persons important to local, California or national history.

This building does not appear eligible under Criterion 2. The original building permit has not been located within the City of Culver City's Planning and Building & Safety files, so the original owner is not known. The first known owners and residents were Mr. and Mrs. Clarence Montgomery Knox. The Knoxes lived at 9814 Washington from at least 1925 until Mr. Knox's death in 1930. Mr. Knox worked in real estate and was president of the Knox Powell Stockton Company. Mrs. Knox was cited in the *Los Angeles Times* social pages for the lavish parties held at their home.

In 1937, a Dr. G. H. Ham was listed as operating his medical practice at 9814 Washington. It is unknown how long Dr. Ham operated his practice from the subject building; by 1942 Dr. Richard Beem is listed at the address. Dr. Beem was joined by Dr. Julius Paskan by 1945, and Dr. Paskan would continue to live and operate his practice from the subject building until circa 2003. It has been vacant since that time.

Little information could be found about Mr. and Mrs. C. M. Knox, and it does not appear that they were persons important to the history of Culver City, California or the nation. Likewise, the property does not appear to be significant for its

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association with Dr. Ham, Dr. Beem or Dr. Paskan, for whom little biographical information could be found.

Due to the scope of this report, a complete ownership or tenancy history was not conducted.

Criterion 3: Design/Construction

It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic value.

The architect of this property has not been identified. However, the building does not appear to represent the work of a known master. The building was constructed in the Tudor Revival style, which was a popular style in 1920s residential architecture in Southern California. A number of buildings of this style and vintage exist in Culver City and the surrounding area. Although the building exhibits the characteristics of the Tudor Revival style, it is a modest example and does not possess high artistic value.

The subject building was constructed in 1921. Although not originally constructed as such, the building appears to have been used as a combination residence and private medical practice for much of its history. Several additional medical offices were located nearby, including 9371, 9722, 9812 and 9814 Washington Boulevard (according to the 1937 Culver City/Palms telephone directory). However, none of these medical offices appear to have been located in single-family residences with doctors residing on-site. Therefore the subject property does not appear to embody the distinctive qualities of a significant property type that was once prevalent in the immediate area.

Today, 9814 Washington Boulevard is the only remaining single-family residence on its block. However, the subject property does not appear to be of outstanding “architectural significance” or “historical or cultural significance.” ARG did not conduct a full review of this historic property type within Culver City or the broader Southern California region as part of this scope of work. Additional contextual research and fieldwork might identify a broader geographic or thematic district.

Criterion 4: Information Potential

It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

This criterion applies primarily to subsurface archeological resources; this evaluation has been limited to above-ground resources. The subject property’s eligibility under

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Criterion 4 has not been assessed as part of this report.

Evaluation of Integrity

Integrity is a key component of the overall building evaluation. For both the NRHP and the CRHR, integrity is the authenticity of a historical resource's physical identity, evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity involves several aspects, including location, design, setting, materials, workmanship, feeling and association. These aspects closely relate to the resource's significance and should be primarily intact for designation. The California Register maintains a lower threshold of integrity than does the National Register.

The subject building's integrity of setting has been compromised, as its immediate surroundings have changed substantially since the time of its initial construction. It has not endured any major modifications or additions to its massing or footprint, other than a small projecting addition at the rear façade. Most of its historic wood windows have been replaced with jalousie windows, which has somewhat diminished its integrity of materials. The building is currently vacant and any signage relating to its use as a doctor's office has been removed, and therefore its integrity of association with the context of medical practice has also been somewhat compromised. However, its integrity of location, design and workmanship are intact. Therefore, although compromised, the overall integrity of the property at 9814 Washington Boulevard is mostly intact.

Local Evaluation Criteria

The City of Culver City applies two threshold criteria in the evaluation of a building for local designation. These criteria mandate that the structure be at least 50 years old or that it have special importance to the City. After satisfying the threshold criteria, the building must meet one or more of the City's assessment criteria. These three criteria state the structure must be of: architectural significance; historical or cultural significance; or of both architectural and historical/cultural significance.

Based on preliminary research and fieldwork outlined in the California Register eligibility evaluation, 9814 Washington Boulevard does not satisfy these criteria for eligibility.

Conclusion

The subject building, located at 9814 Washington Boulevard in the City of Culver City does not appear to be eligible for individual listing on the NHRP or the CRHR as it does not meet any of the four criteria for eligibility.



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Furthermore, the property does not appear to be individually eligible for local designation.

A review of the readily available historical record suggests that 9814 Washington Boulevard is not historically significant as an individual resource.

Sources

California Index. www.lapl.org

Cerra, Julie Lugo. Phone interview, conducted by Katie Horak of ARG (July 21, 2009), and email correspondence (July 24, 2009).

Google Satellite Maps.

Historic Aerial Photographs. www.historicaerials.com

Culver City/Palms Telephone Directories, including years 1937, 1942, 1945 and 1949.

Los Angeles County Tax Assessor Information.

Los Angeles Times research, available through Los Angeles Public Library.

Sanborn Fire Insurance Maps for Culver City, 1919, 1924, 1929-1950, Index.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Horak', is written over a horizontal line.

Katie Horak
Architectural Historian | Preservation Planner

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9814 Washington Boulevard, Culver City, view facing southeast



View facing southeast, detail of main façade

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Rear (south) façade of building and rear lot, view facing northwest



Detail of rear (south) façade, with projecting addition.



Memorandum

To: Greg Reitz
Principal
REthink Development
9812 Washington Blvd.
Culver City, CA 90232

Project: Screenland Arts and Apartments Project
Project No.: 220604
Date: July 27, 2022
Via: greg@rethinkdev.com

Introduction

Architectural Resources Group (ARG) has prepared this memorandum for REthink Development in support of the Screenland Arts and Apartments Project (the Project) at 9810 and 9814 Washington Boulevard/9763 Culver Boulevard in Downtown Culver City (Project Site). The Project is a three- and four-story mixed-use development comprising arts space and restaurant uses at ground level and three levels of residential uses above, with a total of 34 residential units.

The purpose of this memorandum is to evaluate whether the Project has the potential to impact historical resources on or in the vicinity of the Project Site. Although there are no historical resources on the Site, there are two historical resources on the same block as the Project: the Kirk Douglas Theatre at 9820 Washington Boulevard and the Washington Building at 9720-30 Washington Boulevard.

For preparation of this report, ARG conducted a site visit in June 2022 to assess existing conditions of the Project Site and its context, reviewed previous historical resource findings, reviewed Project documents, and evaluated the Project against applicable *Secretary of the Interior's Standards for Rehabilitation* (the Standards). ARG's review of the Project was based on the following Project documents:

- Project application submitted to the City of Culver City, dated June 14, 2022

- Architectural drawings (plans and elevations), Brooks + Scarpa, July 12, 2022

ARG staff who participated in the preparation of this memorandum include Katie Horak, Principal, and Evanne St. Charles, Senior Associate, both of whom exceed the Secretary of the Interior's Professional Qualification Standards in Architectural History.

In summary, ARG finds that the Project will not have a direct or indirect impact on historical resources, as described in the following pages.

Existing Conditions

Project Site

The Project is located at 9810-9814 Washington Boulevard/9763 Culver Boulevard in downtown Culver City. The Site extends through the block. Trapezoidal in shape, the Project Site is located midblock and has neighboring development to both the east and west. The Site sits between the Kirk Douglas Theatre to the southwest and a row of two one-story commercial buildings to the northeast. The two-story, flatiron-shaped Washington Building caps the block to the northeast.

The general site character is urban, with buildings constructed to the property line and activated streetscapes. The sidewalk on the Culver Boulevard frontage is wide, with regular plantings and areas for sitting and dining. Culver City Civic Center is located directly to the south, and more commercial uses are directly to the north and east. The character of development changes in density to the west, with seven- and eight-story office and residential buildings located on the west side of Duquesne Avenue/Hughes Avenue.

The Project Site is currently improved as follows:

- 9810 Washington Boulevard: a one-story commercial building (constructed 2012) that extends through block, with frontage on Washington and Culver Boulevards.
- 9814 Washington Boulevard: a two-story, single-family residence with office constructed circa 1921 fronting north onto Washington, and an enclosed service yard related to the Kirk Douglas Theatre at the southwest end of the property.

9810 Washington will be retained as part of the project. The residence/office at 9814 Washington and all site improvements on that parcel will be demolished as part of the Project. The building at 9814 Washington Blvd was evaluated for potential historic significance in 2009 and determined to be ineligible for listing the National Register of Historic Places (NRHP), and California Register of Historical Resources (CRHR), or for local Culver City designation.¹

Adjacent Historical Resources

There are two historical resources in the vicinity of the Project Site. These include the Kirk Douglas Theatre and the Washington Building, described below:

Kirk Douglas Theatre, 9820 Washington Boulevard

The Kirk Douglas Theatre at 9820 Washington Boulevard is a one-story, single auditorium theatre constructed circa 1945. It is located next door (to the west of) the Project Site. Originally known as the Culver Theatre, the Late Moderne style building was originally designed for film and had a seating capacity of 1,150. In the 1970s it was converted from a single screen into a triplex. The Culver Theatre closed in 1989 and suffered damage in the 1994 Northridge earthquake. It reopened as a performing arts center and playhouse in 2004 and it currently known as the Kirk Douglas Theatre. The building is characterized by its corner pylon sign, that still reads “Culver” in neon.

The Kirk Douglas Theatre has been determined eligible for local designation.²

Washington Building, 9720-30 Washington Boulevard

The Washington Building at 9720-30 Washington Boulevard is a two-story, Beaux Arts style building constructed circa 1925. It is located down the block (about 80 feet) from the Project Site. The building is characterized by its triangular “flatiron” shape and regular arched fenestration. Originally constructed to house the Harry H. Culver Company real estate company, the building is currently occupied by a variety of retail, restaurant and commercial tenants.

¹ Architectural Resources Group, “9814 Washington Boulevard,” correspondence with Christine Byers, City of Culver City, July 29, 2009.

² In 1994 as part Section 106 review after the Northridge Earthquake, the Culver Theatre was assigned California Historical Resource Status Code 5S2, or “Individual property that is eligible of local listing or designation.”

The Washington Building was listed in the NRHP in 1991.³ It is also listed in the CRHR by virtue of its listing in the NRHP. The building is also listed as a Culver City Landmark.

Project Description

The Project combines 9810 and 9814 Washington Boulevard with a lot tie for a total 12,768 square feet of lot area. The existing one-story restaurant building at 9810 Washington Boulevard will be retained and integrated into the Project, with a two-story rooftop addition (for a total of three stories on this portion of the Project site). The existing residence/office at 9814 Washington Boulevard will be demolished to make way for the Project, which will rise four stories on this portion of the Project Site. The two volumes will be connected by exterior corridors/bridges edged with planters, and a rooftop garden will be located atop the three-story building. The Project comprises arts space and restaurant uses at ground level and two and three levels of residential uses above, with a total of 34 residential units, of which six will be deed restricted Affordable: 2 Very Low Income and 4 Workforce. No on-site parking will be provided.

The Project's four-story portion (at the southwest half of the Project Site) will be a maximum of 54'6" to the top of the parapet. The three-story portion (at the northeast half of the Project Site) will be 44'6" to the top of the parapet.

Between the new arts space and the existing restaurant building, the existing public walkway will be enhanced, creating a paseo that connects Washington and Culver Boulevards through the Project Site. The Project will create new public space with landscaping and decorative paving at the sidewalk.

Project Impacts Analysis

CEQA Thresholds

Enacted in 1970, the California Environmental Quality Act (CEQA) is the principal statute mandating environmental assessment of land use and development projects in California. The

³ Carson A. Anderson, "Washington Building," National Register of Historic Places Registration Form, final April 29, 1991.

primary goal of CEQA is to (1) evaluate a project's potential to have an adverse impact on the environment, and (2) minimize these impacts to the greatest extent feasible through the analysis of project alternatives and, if needed, implementation of mitigation measures.

Historical resources are considered to be a part of the environment and are thereby subject to review under CEQA. Section 21084.1 of the California Public Resources Code states that for purposes of CEQA, "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."⁴ This involves a two-part inquiry. First, it must be determined whether the project involves a historical resource. If it does, then the second part involves determining whether the project may result in a "substantial adverse change in the significance" of the historical resource.

To address these issues, guidelines relating to historical resources were formally codified in October, 1998 as Section 15064.5 of the CEQA Guidelines. The guidelines state that for purposes of CEQA compliance, a "historical resource" shall be defined as any one of the following:⁵

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources.
2. A resource included in a local register of historical resources, or identified as significant in a qualified historical resource survey, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrate that it is not historically or culturally significant.
3. 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 a 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 in the California Register of Historical Resources.

⁴ California Code of Regulations, Title 14, Chapter 3, Section 15064.5.

⁵ Ibid.

Once it has been determined that a historical resource is present, it must then be determined whether the project may result in a “substantial adverse change” to that resource. Section 5020.1. of the California Public Resources Code (PRC) defines a substantial adverse change as the “demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired.” Furthermore, according to Title 14 of the California Code of Regulations (CCR), the significance of a historical resource is materially impaired when a project:

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

Generally, a project that follows 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.⁶

Project Evaluation against the Standards

The Standards generally guide the treatment of a historic building's significant spaces, features, and materials. Because the Project will not include development activities at any identified historical resources, Standards 1-8 do not apply to the Project. However, Standards 9 and 10 relate specifically to new construction on or adjacent to a historic site and are thus applicable to

⁶ 14 CCR 15064.5

the Project, particularly as it relates to its adjacency to the Kirk Douglas Theatre and the Washington Building.⁷

Upon review of Project documents, ARG finds that the Project will comply with Standards 9 and 10 as follows:

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

Kirk Douglas Theatre

The Project is located adjacent to (directly to the northeast of) the Kirk Douglas Theatre. The new building will be differentiated from the historic resource such that it does not replicate any of the historic elements or features of the historic building, or attempt to appear as related historic construction. Rather, the new building will have a contemporary aesthetic typical of the 2020s, rather than the 1940s.

The new development will be roughly 54'6" tall at its closest point to the Kirk Douglas Theatre, which is 42'4 ½" tall at its closest point to the Project. Although it is somewhat taller than the Kirk Douglas Theatre, it is not so much so that it will overwhelm the historic resource. Furthermore, the massing of the Project is broken up in such a way that it appears as two volumes (one three stories and one four stories) with a gap between them, which also helps to keep the Project visually compatible with the historic resource in terms of massing and scale. The Kirk Douglas Theatre is already in a neighborhood of tall buildings, with seven- and eight-story buildings directly to the west, so its setting will not be further compromised by the Project.

The architectural features of the Project are also compatible with the Kirk Douglas theatre in that they are quiet and unornamented, with simple rectilinear massing that does not compete with the curvilinear forms and massive pylon sign of the theater. The dark color of the closest volume to the theater and the simplicity of its materiality help it to recede. The Project's north façade

⁷ All ten Secretary of the Interior's Standards for Rehabilitation can be viewed at the following link: <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>.

storefront is the same (or similar) height to the theater entry, which helps to retain a compatible, pedestrian-scale at the sidewalk. In general, the Project will clearly be a contemporary, modern-day development, but will not overwhelm or overpower the theater – all objectives of Standard no. 9.

Washington Building

The Washington Building is relatively distant from the Project Site; there are two one-story commercial buildings between the Project and the Washington building, creating a buffer of about 80 feet. The Project is three stories tall at its closest point to the Washington Building, which is two stories tall. Thus, there is not a significant difference in scale between the two buildings, and due to the distance between them the Project will not overwhelm the Washington Building in terms of its massing, size, and scale.

Furthermore, the general setting of the Washington Building is widely varied in terms of the built environment. There is a contemporary three-story building constructed circa 2020 across the street to the north, and two- and three-story commercial and civic center buildings to the south. Thus the addition of a three- and four-story building down the block from the Washington Building will not impact its setting and environment, which are already varied.

For these reasons, the Project meets Standard no. 9.

- 10. New additions and adjacent or related new construction shall 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.*

As previously discussed, the Project includes new construction in the vicinity of two historical resources. The Project does not include any additions or modifications to the Kirk Douglas Theatre or the Washington Building, or any related new construction.

If the Project were to be removed in the future, the Kirk Douglas Theatre and the Washington Building would remain unchanged. They would retain their essential form and integrity, and all of their character-defining features.

For these reasons, the Project meets Standard no. 10.

Conclusion

In summary, the Project will not have a direct or indirect impact on any historical resources. There are no historical resources on the Project Site. There are two historical resources in the vicinity of the Project: the Kirk Douglas Theatre and the Washington Building. The Project meets the Standards as they apply to adjacent new construction, and the significance and integrity of these two historical resources will not be impaired by the Project.