

5. Environmental Analysis

5.3 CULTURAL RESOURCES

Cultural resources comprise archaeological and historical resources. A cultural resource is defined as any object or specific location of past human activity, occupation, or use, identifiable through historical documentation, inventory, or oral evidence. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. Cultural resources can be separated into three categories: archaeological, built environment, and traditional cultural resources.

Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Archaeological resources include both historic and prehistoric remains of human activity. Historic-period resources include historic structures, structural ruins (such as foundation remnants), sites (such as artifact reuse deposits and artifact-filled features), objects, or places that are significant for their engineering, architecture, cultural use, or association. Prehistoric resources can include lithic artifact or ceramic scatters, quarries, habitation sites, temporary camps/rock rings, ceremonial sites, and monuments, canals, historic roads and trails, bridges, and ditches and objects. Prehistoric resources can include lithic artifact or ceramic scatters, quarries, habitation sites, temporary camps/rock rings, ceremonial sites, and monuments, canals, historic roads and trails, bridges, and ditches and objects.

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the McKinley Elementary School Campus Master Plan Project (Proposed Project) to impact cultural resources. Impacts to paleontological resources are addressed in Section 5.5, *Geology and Soils*. Tribal Cultural resources are addressed in Chapter 6, *Other CEQA Considerations* Section 6.2, *Impacts Found Not to be Significant*.

The analysis in this section is based in part on the following technical report:

- *Archaeological and Paleontological Resources Assessment for the McKinley Elementary Campus Master Plan Project*, Cogstone, September 2022
- *McKinley Elementary School Campus Plan Project Historical Resources Inventory Report*, Historic Resources Group, January 2022
- *McKinley Elementary School Campus Plan Project Historical Resources Impact Assessment*, HRG, March 2023

A complete copy of this technical report is provided in Appendices F1 through F3 of this Draft EIR.

During the Initial Study/Notice of Preparation (IS/NOP) public review period, comment were received regarding historic impacts associated with the Proposed Project. A California Environmental Quality Act (CEQA) scoping meeting was conducted on January 31, 2023, where additional concerns regarding these issues were raised. The IS/NOP and all scoping comment letters are included as Appendices B and C of this document.

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5.3.1 Environmental Setting

5.3.1.1 REGULATORY BACKGROUND

Federal, state, and local laws, regulations, plans, or guidelines related to cultural resources that are applicable to the Proposed Project are summarized below.

Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the National Register of Historic Places, which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to consider the effects of their undertakings on historic properties. Section 106 review ensures that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

National Register of Historic Places

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

Authorized under the NHPA, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archaeological resources. The NHRP is administered by the National Park Service, which is part of the U.S. Department of the Interior.

To be eligible for listing in the NRHP, a resource must meet at least one of the following criteria:

- A. Is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Is associated with the lives of persons significant in our past.
- C. Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.
- D. Has yielded, or may be likely to yield, information important in history or prehistory.

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Historic Integrity

Historic integrity is the ability of a property to convey its significance. It is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period" (NPS 1997a) The National Park Service (NPS) defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- **Location** is the place where the historic property was constructed or the place where the historic event occurred.
- **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.
- **Workmanship** is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- **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.

Period of Significance

The NPS defines 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 (NPS 1997a).

Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods, places, and historic contexts as historic districts. The NPS defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development" (NPS 1997b). Historic district derives its significance as a single unified entity.

According to the NPS, "a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole" (NPS 1997b). Resources that have been found to contribute to the historic identity of a district are referred to as district contributors.

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Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

As identified by the NPS, school campuses, which are often geographically concentrated and purpose-built, are often evaluated as historic districts. Schools in the United States, especially those built in the 20th century, often exhibit definable campuses and unified site plans which reflect individual building's interconnectedness and functionality as a larger grouping. Although historic districts can contain resources built during distinct periods of development, many school campus historic districts reflect a specific era of development and are contained within a common period of significance.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 (United States Code, Title 16, section 470aa et seq.) regulates the protection of archaeological resources and sites on federal and Native American lands.

Native American Graves Protection and Repatriation Act

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

State

The California Office of Historic Preservation, a division of the California Department of Parks and Recreation, is responsible for carrying out the duties described in the PRC and maintaining the California Historic Resources Inventory and the California Resources of Historical Resources (CRHR). The state-level regulatory framework also includes CEQA, which required the identification and mitigation of substantial adverse impacts that may affect the significance of eligible historical and archaeological resources.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether historic and/or archaeological resources may be adversely impacted by a proposed project. Under CEQA, 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” (PRC Section 21084.1). Answering this question is a two-part process. First, the determination must be made as to whether the proposed project involves cultural resources. Second, if cultural resources are present, the proposed project must be analyzed for a potential “substantial adverse change in the significance” of the resource.

Historical Resources

According to CEQA Guidelines Section 15064.5, for the purposes of CEQA, historical resources are:

- A resource listed in, or formally determined eligible...for listing in the California Register of Historical Resources (PRC 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.)

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- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significance in a historic resources survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript that the lead agency determines to be eligible for national, state, or local landmark listing; generally, a resource shall be considered by the lead agency to be historically significant (and therefore a historic resource under CEQA if the resource meets the criteria for listing on the California Register (as defined in PRC Section 5024.1, Title 14 CCR, Section 4852).

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity (as defined above) does not meet NRHP criteria may still be eligible for listing in the CRHR.

According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude the lead agency from determining that the resource may be a historical resource (PRC Section 5024.1). Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (State CEQA Guidelines, Section 15064.5[b]).

Substantial Adverse Change and Indirect Impacts to Historical Resources

CEQA Guidelines specify that a “substantial 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” (State CEQA Guidelines, Section 15064.5). Material impairment occurs when a project alters in an adverse manner or demolishes “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” or eligibility for inclusion in the NRHP, CRHR, or local register. In addition, pursuant to State CEQA Guidelines Section 15126.2, the “direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”

The following guides and requirements are of relevance to this study’s analysis of indirect impacts to historic resources. Pursuant to CEQA Guidelines Section 15378, study of a project under CEQA requires consideration of “the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” State CEQA Guidelines (Section 15064(d)) further define direct and indirect impacts:

- (1) A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.
- (2) An indirect physical change in the environment is a physical change in the environment, which is not immediately related to the project, by which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.

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(3) An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.

Archaeological Resources

PRC Section 21083.2(g) defines a unique archaeological resource 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 that it meets any of the following criteria:

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

If it can be demonstrated that a proposed project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a], [b], and [c]). CEQA 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 to be a significant effect on the environment (State CEQA Guidelines Section 15064.5[c][4]).

California Public Resources Code

Archaeological, paleontological, and historical sites are protected under a wide variety of state policies and regulations in the California Public Resources Code (PRC). In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.

PRC Sections 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation (OHP), which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

Requirements for paleontological resource management are included in California PRC Division 5, Chapter 1.7, Section 5097.5, which states:

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A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

These statutes prohibit the removal, without permission, of any paleontological site or feature from land under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (i.e., state, county, city, and district) land.

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is “an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest (CPHI) program, identified as significant in historical resources surveys, or designated by local landmarks programs, may be nominated for inclusion in the CRHR.

Resources eligible for listing include buildings, sites, structures, objects, or historic districts that retain historical integrity and are historically significant at the local, state, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. It is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history.

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity does not meet NRHP criteria may still be eligible for listing in the CRHR.

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Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) provide guidance for reviewing proposed projects that may affect historical resources. The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation, rehabilitation, and maintenance of historic materials and features.

The Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historical resources. However, compliance with the Standards does not necessarily determine whether a project would cause a substantial adverse change in the significance of an historical resource. Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less than significant adverse impact on a historic resource [CEQA Guidelines Section 15064.5(4)(b)(3)].

The statutory language referenced above references the Secretary of the Interior's standards and guidelines for four distinct historic "treatments," including: (1) preservation; (2) rehabilitation; (3) restoration; and (4) reconstruction. The specific standards and guidelines associated with each of these possible treatments are provided on the NPS' website regarding the treatment of historic resources. For analytical purposes, a threshold decision must be made regarding which "treatment" standards should be used to analyze a project's potential effect on historic resources. According to the NPS, the "rehabilitation" standards (the Rehabilitation Standards) are most frequently applied for the majority of historic buildings. The Rehabilitation Standards acknowledge the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.

In the case of schools located within the Santa Monica-Malibu School District (SMMUSD) that contain historic districts, the Rehabilitation Standards provide a framework for conservative impact analysis for future projects. A discussion of the Rehabilitation Standards as they may apply to future projects within the district is included below.

Secretary of the Interior's Standards and Guidelines for Rehabilitation

The Standards are intended as general guidance for work on any historic building. The NPS encourages maintaining the integrity of a district through the appropriate design of infill buildings at vacant sites or sites where new buildings replace non-contributing buildings. The Guidelines for Rehabilitation expand the discussion to sites and neighborhoods.

As written in the Guidelines for Rehabilitation, there is a distinction, but not a fundamental difference, between the concerns for additions to historic buildings and new construction, or "infill" adjacent to historic buildings on a property or within a district. As with most matters of design and planning, the differences are defined by the scale, site, setting, and project.

Following are quotations from the NPS guidance.

"... a modern addition should be readily distinguishable from the older work; however, the new work should be harmonious with the old in scale, proportion, materials, and color."

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"Plan the new addition in a manner that provides some differentiation in material, color, and detailing so that the new work does not appear to be part of the historic building. The character of the historic resource should be identifiable after the addition is constructed" (NPS 2010)

Rehabilitation Standards for Historic Districts

Future projects that involve new infill construction and/or demolition of contributing features to a historic district have the potential to impact the historic district. However, for potential impacts to be considered a "substantial adverse change" to a historic district under CEQA, it must be shown that the new construction and/or removal of the contributing buildings associated with a project would result in the physical alteration of the historic district such that its ability to convey its historical significance and eligibility for historic listing would be threatened.

Typically, if new buildings are designed to be compatible and differentiated from the historic district using the Rehabilitation Standards, future projects will not result in a "substantial adverse change." Similarly, if a historic district retains a majority of its contributing features and integrity, and continues to convey its significance, future projects will not result in a "substantial adverse change." Analysis should be conducted on a case-by-case basis to consider all potential impacts that a project may have on a historic district, including the percentage of resources retained and lost, historic spatial and circulation patterns, scale and massing, and visibility from the public right-of-way. As such, the Rehabilitation Standards provide a certain level of flexibility for future projects planned within or adjacent to historic districts.

Local

Santa Monica/Malibu United School District Board Policy and Administrative Regulation 7113

The District adopted "Board Policy 7113: FACILITIES: Historical Resources" on February 9, 2021, for the purpose of outlining objectives and establishing procedures for the treatment of historical resources on District campuses. SMMUSD developed this policy to identify and clarify treatment of historical resources on properties under SMMUSD jurisdiction. SMMUSD owns and operates multiple school campuses/properties, which together contain over 100 individual buildings, some of which date from the mid-20th century or earlier. Some of these buildings might be or contain elements that potentially have historical significance. SMMUSD understands that historical resources should be identified in advance of approval of campus rehabilitation and construction to retain and/or commemorate their significance for future generations when feasible and consistent with educational priorities. Objectives of Board Policy 7113 include engaging architects and engineers with demonstrated preservation expertise to consult and guide the planning and design process, where appropriate and consulting with interested third parties, including the Santa Monica Conservancy when potential impacts to identified historic resources are involved. In addition to Board Policy 7113, the District has also prepared Administrative Regulation 7113, which establishes procedures for the retention of qualified historical resources consultants to survey each campus prior to approval of a master plan or design of a school facilities project to identify any historical resources on the campuses.

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5.3.1.2 PREHISTORIC SETTING

Approaches to prehistoric frameworks have changed over the past half century from being based on material attributes to radiocarbon chronologies to association with cultural traditions. Archaeologists defined a material complex consisting of an abundance of milling stones (for grinding food items) with few projectile points or vertebrate faunal remains dating from about 7 to 3 thousand years before the present as the “Millingstone Horizon”. Later, the “Millingstone Horizon” was redefined as a cultural tradition named the Encinitas Tradition with various regional expressions including Topanga and La Jolla. Use by archaeologists varied as some adopted a generalized Encinitas Tradition without regional variations, some continued to use “Millingstone Horizon” and some used Middle Holocene (the time period) to indicate this observed pattern (Cogstone 2022).

Recently, it was recognized that generalized terminology is suppressing the identification of cultural, spatial, and temporal variation and the movement of peoples throughout space and time. These factors are critical to understanding adaptation and change (Cogstone 2022).

The Encinitas Tradition characteristics are abundant metates and manos, crudely made core and flake tools, bone tools, shell ornaments, very few projectile points with subsistence focusing on collecting (plants, shellfish, etc.). Faunal remains vary by location but include shellfish, land animals, marine mammals, and fish (Cogstone 2022).

The Topanga cultural pattern of the Encinitas Tradition is applicable to coastal Los Angeles and Orange counties. This pattern is replaced by the Angeles pattern of the Del Rey Tradition later in time (Cogstone 2022).

The Topanga cultural pattern can be described by three phases: Topanga I (8,500 to 5,000 years before the present [BP]), Topanga II (5,000 to 3,500 BP), and Topanga III (3,500 to 1,000 BP). Topanga I is characterized by the use of manos and metates, abundant core tools, and leaf-shaped projectile points, Topanga II is characterized by use of mortar and pestle, smaller points, nearshore and terrestrial food sources, while Topanga III is characterized by increased abundance of metates and manos, mortar and pestles, more varied types of projectile points and the stone-line earthen ovens. The Angeles Pattern can be described by three periods: Angeles IV (1,000 to 800 BP), Angeles V (800 to 450 BP), and Angeles VI (450 to 150 BP). Angeles IV is characterized by new cottonwood points, *Olivella* cupped beads, and *Mytilus* shell disk, Angeles V is characterized by use of larger steatite artifacts, larger vessels, and more elaborate effigies. The Angeles VI period is characterized by Gabrielino post-contact with Euro-Americans; specifically population loss due to disease, social/political disruption, and the inclusion of Euro-American tools and materials.

5.3.1.3 ETHNOGRAPHIC SETTING

The Gabrielino language was derived from the Takic family of the Uto-Aztecan linguistic stock, which can be traced to the Great Basin area. The Gabrielino territory encompassed a vast area stretching from Topanga Canyon in the northwest, to the base of Mount Wilson in the north, to San Bernardino in the east, Aliso Creek in the southeast and the Southern Channel Islands, in all an area of more than 2,500 square miles. At European contact, the tribe consisted of more than 5,000 people living in various settlements throughout the area. Some of the villages could be quite large, housing up to 150 people. The closest known village to the Proposed Project’s Site is Wanaawna located 3.75 miles south.

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The Gabrielino structures were domed and circular thatched with tule or similar materials. The main food zones were marine, woodland, and grassland. Acorns were an important food source. Villages were located near water sources necessary for the leaching of acorns, which was a daily occurrence. Grass seeds were the next most abundant plant food used along with chia. Seeds were parched, ground, and cooked as mush in various combinations according to taste and availability. Greens and fruits were eaten raw or cooked or sometimes dried for storage. Bulbs, roots, and tubers were dug in the spring and summer and usually eaten fresh. Mushrooms and tree fungus were considered delicacies. Various teas were prepared from flowers, fruits, stems, and roots as beverages and for medicinal purposes (Cogstone 2022).

Common game animals were deer, rabbit, jackrabbit, woodrat, mice, ground squirrels, antelope, quail, dove, ducks, and other birds. Most predators were avoided as food, as were tree squirrels and most reptiles. Trout and other fish were caught in the streams. Salmon was available in the larger creeks. Sea mammals, fish, and crustaceans were hunted and gathered from both the shoreline and the open ocean, using reed and dugout canoes. Shellfish were the most common resource, including abalone, turban, mussels, clams, scallops, bubble shells, and others (Cogstone 2022).

5.3.1.4 HISTORIC OVERVIEW

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period, when California became a territory of the United States.

After Mexico won its Independence from Spain (1821), the Secularization Act as passed in 1833 which gave the mission lands to the Mexican government which he redistributed in the form of Land Grants. The Proposed Project's area is located within San Vicente Y Santa Monica land grant, in 1839. The approximately 33,000-acre land grant was given to Francisco Sepulveda by Spanish California governor Juan Alvarado and covered what is today Santa Monica, Brentwood, Mandeville Canyon, and parts of West Los Angeles. However, the boundaries were in dispute throughout the Mexican Period and continued to be even after the Mexican-American War. Sepulveda's heirs were finally granted patent to the 30,260-acre Rancho San Vicente y Santa Monica in 1881 (Cogstone 2022).

The early years of the twentieth century ushered in dramatic changes to schools in the area. From approximately 1903 to 1933, schools in Santa Monica increased in number, grew in populations served, and changed in design and orientation.

In 1903, Santa Monica became a city of the fourth class, thereby entitling it to maintain its own schools. Thus, the school district became the Santa Monica City School District. Increasingly, schools were expected to serve community needs in Santa Monica. In 1905, the newly established Woman's Club of Santa Monica

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championed the building of schools and a bond issue in 1906 provided funding for additional schools. By 1907, the population of Santa Monica had jumped to 7,200 residents. The following year, the city expanded further by annexing the community of Ocean Park to the south (HRG 2022)

In the early twentieth century, the Progressive Education Movement came to influence education in Santa Monica. Shunning traditional teaching philosophies, the Progressive Education Movement emphasized hands-on methods of teaching that allowed children to explore and learn to the best of their own individual abilities. This influenced school programming, which increasingly emphasized individualized curriculum. As populations increased and space became scarce at schools, the Progressive Education Movement philosophies also provided a method for economizing space. As recorded by Historian Donald M. Cleland, during the early twentieth century, great strides were made in the Santa Monica school system:

The phenomenal growth of enrollment which the Santa Monica schools experienced during the early part of the twentieth century focused the attention of the board of education upon the problem of providing adequate physical facilities. It was during this time that...changes in curriculum were observed at all levels of instruction. At the elementary level, the platoon system of organization was adopted and put into effect in the four new elementary schools designed for this program. The platoon schools, as such, continued in operation until the early 1930s.

Platoon school systems divided larger student populations into two groups, one of which would study academic subjects in the classrooms in the morning while the second utilized the rest of the school facility for specialized subjects. Then, halfway through the day, the two groups would switch places and study subjects. The system was praised by leaders of the Progressive Education Movement including John Dewey and Evelyn Dewey and was thought to achieve a more humanistic and democratic education while also providing administrative efficiency (HRG 2022)

During this period of development, one of the biggest projects was the construction of Jefferson School (1907; demolished) at 1333 6th Street to replace the 6th Street School. A new, three-story high school of wood frame construction (1910) also replaced Lincoln High School at 10th Street and Arizona Avenue. Roosevelt Elementary School (1906) was constructed on 6th Street between Montana and Idaho avenues. John Adams Middle School (1913-1914) was built on Ocean Park Boulevard between 5th and 6th streets.

During the 1920s, several new schools were constructed and existing schools were expanded. The 1920s also brought a new design vocabulary to many schools, with several schools employing the wildly popular period-revival styles that came to characterize Southern California architecture. Attention to design and detail was conferred on buildings from the 1920s, and campuses served a more unified role with grand entrances and a greater degree of spatial differentiation.

During this period, Santa Monica was first in spending on high school education among cities in Southern California. A 1927 study found that half of the possible residential areas were already improved and that, in less than ten years, the population of the city would double. Recommendations included building a new junior high school in the southeast part of the city and renovating the existing high school and elementary schools. The study proposed an “Americanization School” with separate facilities from the general school

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population, perhaps a reflection of the multiethnic and multilingual nature of the population streaming into the area in the 1920s. The study also recommended that new school sites be spread evenly throughout the city, with little overlap.

The newly constructed schools featured two-story brick edifices. They included John Muir Elementary (1923) at 725 Ocean Park Boulevard; the new McKinley Elementary School (1923 Allison & Allison) at 24th Street and Santa Monica Boulevard; Madison Elementary School (1926, Francis David Rutherford) on the site of the old Lincoln High School at 10th Street and Arizona Avenue; Lincoln Junior High School (1923-1924) at 1425 California Avenue; the Garfield School at 1740 7th Street, and Franklin Elementary School (reportedly built with beach sand) at 2400 Montana Avenue. Additions to the Grant School were made in 1924 by local architect Francis David Rutherford. A six-room addition by Allison & Allison was made to John Adams Middle School in 1920 (HRG 2022).

The 1930s and 1940s brought about major changes for schools serving Santa Monica and Malibu. The Long Beach Earthquake of 1933, Works Progress Administration program, and advent of World War II all left indelible marks on the cities of Santa Monica and Malibu and the schools therein.

5.3.1.5 CAMPUS HISTORY

The original campus was constructed in 1905 about one-quarter mile northwest of its present-day location and was rebuilt in 1922 at its current location. The new campus was designed by Los Angeles master architectural firm Allison & Allison in the Italian Renaissance Revival style of architecture. In 1933 a magnitude 6.4 earthquake in Long Beach caused extensive damage throughout the region. Following the earthquake, the architectural firm of Parkinson & Parkinson rehabilitated the damaged school from 1935 to 1937 (HRG 2023).

Although construction ceased during the World War II years (1939 to 1945), development and expansion of the campus resumed shortly thereafter to meet increased student demand. Subsequent construction at the school in the post-war era (1945 to 1968) was not completed as part of long-term planning efforts. In 1951, architect Joe M. Estep designed the cafeteria building to the west of the main building. The cafeteria was connected via two arcades, thereby creating the smaller West Courtyard. In 1973, the architectural firm of Powell, Morgridge, Richards & Coghlan remodeled the campus. This work included alterations to the main entrance and the replacement of windows and doors. In 1973, Building D was constructed as the preschool for the campus (see Figure 3-4, *Existing Site Plan*).

The existing campus has four permanent buildings as well as athletic facilities, open spaces, and artwork. Building A (Cafeteria) was constructed in 1951 and designed by Joe M. Estep. Building B (Classrooms Building) was constructed in 1923 and designed by Allison & Allison. The building was rehabilitated by Parkinson & Parkinson in 1935 to 1937 and by Powell, Morgridge, Richards & Coghlan in 1973. Building C (Classrooms/Kindergarten) was constructed in 1923 and designed by Allison & Allison. The building was expanded by Allison & Allison in 1929 and 1930. It was rehabilitated by Parkinson & Parkinson in 1935 to 1937 and by Powell, Morgridge, Richards & Coghlan in 1973. The work included alterations to the main entrance and the replacement of windows and doors. An addition was added to the west wing facing the courtyard circa 1958. The building was again altered in 1999. Building D (preschool) was constructed circa 1973.

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The Santa Monica Boulevard Quad that is south of Building C along Santa Monica Boulevard dates to the beginnings of the campus (circa 1923) and has been modified over time; the Main Courtyard also dates to the early development of the campus (circa 1923). The West Courtyard dates to circa 1951 and was created by the arcade built at that time.

The Main Courtyard of the campus also includes “Storybook Land,” a four-foot-tall, cast stone sculpture that depicts two children reading a book and was created by artist Stefan De Vriedt in 1936. The sculpture was funded by the Works Progress Administration (WPA). In 1937, a bronze plaque was installed by the WPA in Building C after its reconstruction. As shown in Table 3-1, *Characteristics of Existing Buildings*, Buildings B and C were constructed in the 1920’s; Building A was constructed in the 1950’s; and Building D was constructed in the 1970’s.

5.3.1.6 CULTURAL RESOURCES WITHIN THE PROPOSED PROJECT’S AREA

Methods Used to Identify Known Cultural Resources

To evaluate the Proposed Project’s potential effects on significant cultural resources, Cogstone (2022) conducted a cultural resources assessment of the Proposed Project’s Site, which included archival research and a pedestrian survey. In 2021, the SMMUSD adopted several procedures for the identification of historic resources at school facilities and their recordation in historical resources inventory reports. Historic Resources Group (HRG 2023) completed an evaluation of the McKinley Elementary School campus using these procedures. The methodology and results of these studies are summarized below and are described in more detail in Appendices F1 through F3 of this DEIR.

Records Search Results

On February 4, 2022, a records search of the California Historical Resources Information System (CHRIS) was conducted at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. The records search was conducted for the entire Proposed Project’s Site as well as a half-mile radius. The purpose of the records search was to determine the extent and location of previous surveys, previously identified prehistoric or historic archaeological site locations, architectural resources, historic properties, cultural landscapes, or ethnic resources within a one-half mile radius of the Proposed Project’s Site. Results of the record search indicate that no previous studies have been recorded within the Proposed Project’s Site; however, 14 cultural resources studies have been conducted within a half-mile radius of the Proposed Project’s Site.

Five previously recorded cultural resources have been recorded within the search radius, as shown in Table 5.3-1, *Previously Recorded Cultural Resources Within a Half-Mile Radius of the Proposed Project’s Site*. Of the five previously recorded cultural resources, two have been recorded within the Proposed Project’s Site (P-19-188708 and P-19-188709).

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Table 5.3-1 Previously Recorded Cultural Resources within a Half Mile Radius of the Proposed Project's Site

Primary No. (P-19-)	Resource Type	Resource Description	Year Recorded	Distance (miles) from Proposed Project's Area	NRHP/CRHR Status
003803	Historic Archeological Site	Santa Monica Air Line Segment. 6-mile segment of Southern Pacific Railroad right-of-way, 1875	2008	0.25-0.5	NR Eligible: Criterion A
004666	Historic Archeological Site	Refuse deposit comprised of one rusted, metal folding chair, one intact, 4 oz. glass instant coffee jar, a broken, unglazed terra cotta pipe, a brick wall or collar segment, concrete, fragments of glass and 2,000+ standard size, red, unmarked bricks, 1960s	2012	0.25-0.5	Unevaluated
188708	Historic Archeological Site	Santa Monica Public Schools Thematic District, 1924.	1993	Within	NR Eligible: Criterion A, and Criterion C
188709	Historic Archeological Site	McKinley Grammar School, 2401 Santa Monica Boulevard. Spanish Colonial Revival style, 1922	1993	Within	NR Eligible: 5D3 and Criterion A.1
189756	Historic Archeological Site	Single Family Residence. 1625 20th St. Spanish Eclectic, constructed 1927 and relocated 1954.	2008	0.25-0.5	NR Not Eligible; CR: Not Evaluated

Source: Cogstone 2022

In addition to the SCCIC records search, a variety of sources were consulted to obtain information regarding the cultural context of the Proposed Project's Site. Additional sources included listings of the NRHP, CRHR, California Points of Historical Interest (CPHI), and California Historical Landmarks (CHL). The Proposed Project's Site was not listed in any of these sources. Historic-period aerial photographs and maps were also reviewed as a part of the study. The Bureau of Land Management (BLM) General Land Office records indicated a positive report of land patents for Ramona, Sepulveda (Accession No. CACAAA 074985; Issued: 7/23/1881; Authority Grant-Spanish/Mexican).

The 2018 Santa Monica Citywide survey lists 1343-1345 Chelsea Avenue as eligible for listing as a Santa Monica Landmark as an excellent example of a 1920s duplex.

Sacred Lands File Search

A Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC) on February 4, 2022. The NAHC responded on March 24, 2022, and indicated that there is positive result of sacred lands or resources known within the same USGS Quadrangle, Township, Range, and Section as the Proposed Project's Site. The NAHC also provided a consultation list of tribes that may have knowledge of cultural

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resources and/or sacred lands within or near the Proposed Project's Site. See also Chapter 6, *Other CEQA Considerations*.

Tribal Consultation

In accordance with Assembly Bill (AB) 52 and PRC section 21080.3.1, the SMMUSD sent formal notification letters of the Proposed Project, dated January 5, 2023, to two Native American tribes that have requested notification from the District: the Gabrieleño Band of Mission Indians – Kizh Nation and the Torres Martinez Desert Cahuilla Indians. No responses were received from the Native American tribes. Therefore, consultation did not take place. No known resources within the campus area were identified as tribal cultural resources as defined in PRC section 21074.

Historical Resources Inventory

After Board Policy 7113 was adopted on February 17, 2021, a Historical Resources Inventory (HRI) was completed by Historic Resources Group (HRG) in 2022. The buildings and features of the McKinley ES campus were considered collectively for their potential eligibility for listing in the NRHP, the CRHP, and/or listing at the local level as a historic district. The findings were recorded in a Historic Resources Inventory Report, which is included as Appendix F1 of this DEIR. In March 2023, HRG prepared a Historic Resources Impact Assessment analyzing potential impacts to the historic district at McKinley ES. This analysis is provided in Section 5.3.3, *Environmental Impacts* below. The Historic Resources Impact Assessment is included as Appendix F2 of this DEIR.

Because the McKinley ES campus contains a grouping of related buildings and features, and was originally developed as a public school, consideration of this property as a historic district is an appropriate analytical framework for its evaluation.

The period of significance for McKinley ES spans from 1923 to 1937. This timeframe includes the original period of development on the campus by Allison & Allison to its rehabilitation by Parkinson & Parkinson following the Long Beach Earthquake. Contributing features are those buildings and features that were constructed during the period of significance and retain their integrity. Table 5.3-2, *Features Included in the Historic District*, identifies buildings and features dating from the period of significance (1923-1937) that are contributors to the historic district. The location of contributing buildings, site features, and additional features to the historic district as well as the campus boundary is shown in Figure 3-6, *Historic District Boundary*.

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Table 5.3-2 Features Included in the Historic District

Feature Name	Year Built	Integrity	Status
Building B	1923	Fair	Contributor
Building C	1923	Fair	Contributor
Santa Monica Boulevard Quad	1923	Good	Contributor
Main Courtyard	1923	Good	Contributor
"Storybook Land" Sculpture	1936	Very Good	Contributor
WPA Bronze Plaque	1937	Very Good	Contributor

Source: Historic Resources Group 2023.

McKinley ES contains a cohesive concentration of two contributing buildings, two contributing site features, and two contributing additional features that dates from the period of significance and has been identified as the historic district. These contributing resources within the boundaries of the historic district remain in their original locations in the southern region of the site, retaining spatial relationships and circulation patterns that have remained unchanged since the late 1920s when it was designed by Allison & Allison. Later development at the campus was tangentially situated to the west (1951) and east (c. 1973) of the contributing buildings.

Assessment of Integrity

Integrity of the property's individual features is varied, and all buildings and features have been subject to varying levels of alteration. However, despite some degree of alteration, the property retains much of the circulation pattern and spatial relationships established during the period of significance that characterize the historic district. A detailed assessment of the integrity of the historic district is discussed below.

Location. The buildings constructed during the period of significance remain in their original locations in the southeastern region of the campus. Therefore, the historic district retains integrity of location.

Design. The historic district retains most of the character-defining features of its original construction and subsequent development during the period of significance. Buildings constructed during the period of significance include Italian Renaissance Revival style buildings that are representative property types typical of design in the 1920s. In addition, the main courtyard and Santa Monica Boulevard Quad are also important features of the site, and reflect the importance given to outdoor spaces in school design from that period. Although some aspects of the design have been altered, such as the reconfiguration of the main entrance, a majority of the essential physical features reflecting the original design and organization of the property as a school from the 1920s to late 1930s, when the building was rehabilitated, remain intact within the historic district. Therefore, the historic district retains integrity of design.

Setting. The historic district is located in the southern region of the school property. Since the period of significance, the school has undergone periodic development, with the addition of two buildings (1951, c. 1973) to the east and west of the school. The property continues to function as a school and newer buildings have

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been constructed for similar uses and functions; as a result, the historic district's immediate surroundings have retained the historic character and identity of a public elementary school. The surrounding area of Santa Monica has a whole has experienced consistent development since the school's establishment in the area in 1923. Particularly, some commercial development was expanded along Santa Monica Boulevard. However, the school's surrounding property uses of residential, educational, and commercial development remain intact. Thus, the historic district retains integrity of setting.

Materials. The historic district retains most of its original materials. Contributors retain most physical elements from the period of significance, including original cladding and detailing such as outdoor corridors. However, all contributors have been altered to some degree. Common alterations include infill additions and replacement of most, if not all, original doors and windows. Therefore, the historic district's integrity of materials has been compromised.

Workmanship. The historic district retains the physical evidence of workmanship. This includes the contributors' general massing, construction methods, and aesthetic principals. Moreover, most exterior cladding and even detail work have been retained. Overall, the buildings continue to retain substantial physical evidence of period construction techniques from initial construction in the 1920s and rehabilitation in the 1930s, including original finishes and design elements that reflect the character and identity of the historic district as the work of notable architects. Therefore, the historic district retains integrity of workmanship.

Feeling. The historic district retains most of the character-defining features of its original construction, including representative building types as well as spatial relationships and circulation patterns that are typical of campuses from this time. These essential physical features continue to convey the original aesthetic and historic sense of a small public school completed in the late 1920s. Thus, the historic district retains integrity of feeling.

Association. Because the historic district retains integrity of location, design, setting, workmanship, and feeling, it retains sufficient integrity to convey its significance as an Italian Renaissance Revival-style public school built during the growth of Santa Monica in the 1920s and rehabilitated following the 1933 Long Beach Earthquake. Therefore, the historic district retains integrity of association.

The integrity of each contributing resource was evaluated and given an assessment of Very Good, Good, or Fair. Integrity assessments and associated thresholds are described in greater detail below.

Buildings which have been given an assessment of Very Good possess the following characteristics (HRG 2022):

- Retain most or all of the seven aspects of integrity
- Exhibit the character-defining features of a distinct architectural style or type
- May exhibit minor alterations, including the replacement of some windows and/or entrance doors or the replacement of roofing material

Buildings which have been given an assessment of Good possess the following characteristics:

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- Retain most or all of the relevant aspects of integrity; likely retains integrity of design and/or workmanship
- May exhibit some character-defining features of a distinct architectural style or type
- May exhibit some degree of alteration, including the replacement of windows, entrance doors, railings, cladding, and/or roofing material, with generally compatible substitutes
- May include subsequent additions that do not disrupt the overall building form

Buildings which have been given an integrity assessment of Fair possess the following characteristics:

- Retain some of the relevant aspects of integrity, but may not retain integrity of design and/or workmanship
- Retain original building form, massing, and scale
- Exhibit multiple alterations, including the replacement of windows, entrance doors, cladding, and/or roofing material, possibly with incompatible substitutes
- May exhibit infill of some original windows and/or entrance doors and/or resizing of original window and door openings
- May include subsequent additions to primary and/or secondary facades, but the original building form is still discernible

Non-contributing buildings are those which were constructed outside the period of significance, or which date from the period of significance but lack sufficient integrity due to extensive alterations. These buildings may have retained the majority of their original massing and may remain in their original locations, and as such, they continue to convey the original plan and spatial relationships associated with the early school period, but ultimately lack the integrity to be considered contributors. Non-contributing resources that were constructed during the period of significance but no longer convey their historic identity due to substantial alteration are given an assessment of Poor.

Evaluation of Eligibility

Based on visual observation of the property, research of primary and secondary sources, and an analysis of the eligibility criteria for listing at the federal, state, and local levels, HRG identified a historic district at McKinley ES eligible for listing in the CR and for designation as a City of Santa Monica historic district. The historic district consists of two (2) contributing buildings, two (2) site features, and two (2) additional features with a period of significance from 1923 to 1937.

The historic district does not appear to be eligible for listing in the NRHP due to integrity considerations. The integrity of materials has been compromised by alterations, which include infill additions and the replacement of original doors and windows. For these reasons, the historic district does not appear to meet the criteria for listing on the NRHP (HRG 2022).

The historic district was determined to be significant under California Register Criterion 1/3 and City of Santa Monica Criterion 1/4-5. The historic district was found eligible for listing within the context of the pre-1933 institutional development in the City of Santa Monica, WPA associations, and for its Italian Renaissance Revival

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design. The historic district has retained integrity of location, design, setting, feeling, workmanship, and association. While integrity of materials has been somewhat compromised by alterations, the CRHP and local designation do not require the same level of integrity as required for the NRHP. Therefore, the historic district retains sufficient integrity to convey its significance at the state level and local level. For these reasons, the historic district appears to meet the criteria for listing on the CRHP and in the city of Santa Monica (HRG 2022).

Character Defining Features

Character-defining features are distinctive elements and physical features that convey the historical appearance of a property and are required for it to convey its historical significance. According to Preservation Brief 17, there is a stepped process to identifying character-defining features (HRG 2022). The first step involves assessing the distinguishing physical aspects of the building. This second step involves examining the building more closely. While on their own each of the elements above may not convey historical significance, in combination they define the property and convey the associations for which it is significant. Table 5.3-3, *Character Defining Features*, provides the character-defining features of each contributing resource to the historic district.

Table 5.3-3 Character Defining Features

Feature Name	Shape/Form	Roof	Openings	Projections	Trim and Secondary Features	Materials	Setting
Building B	-Rectangular Plan -2-story height	-Gable roof	-Original door and window openings -Tripartite arched vents	-Courtyard patio	-	-Smooth stucco exterior -Red clay roof tiles	-Location and proximity to Building C
Building C	-Irregular, 'F'-shaped plan -1- to 2-story height -Central body with four wings	-Gable roof with vent dormers	-Original arched window openings -Tapered chimney	-Front-gabled bays -Tapered chimney	-Blind arch -Terracotta medallions/ cartouches -Pilasters and Solomonic column -Stringcourse -Arched windows	-Smooth stucco exterior -Terracotta cartouche	-Setback from 14th Street -Location and proximity to other contributing buildings
Santa Monica Boulevard Quad	-Rectangular shape	-	-	-	-	-	-Setback from Santa Monica Blvd. -Location and proximity to contributing buildings
Main Courtyard	-Rectangular shape -Central sculpture and pedestal	-	-	-	-	-	-Proximity to Buildings B and C

Source: Historic Resources Group 2022.

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5.3.2 Thresholds of Significance

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

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

The IS/NOP, included as Appendix B, substantiates that impacts associated with the following thresholds would be less than significant; therefore, these impacts will not be further addressed in this DEIR:

- Threshold C-3

These impacts are addressed in Chapter 6, *Other CEQA Considerations*, and in Appendix B of this DEIR.

5.3.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study/Notice of Preparation disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.3-1: The Proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. [Threshold C-1]

As discussed in Section 5.3.1.6, *Cultural Resources within the Project Area*, HRG conducted an analysis of potential impacts to the historic district as McKinley ES from Project implementation (HRG 2023). The Proposed Project would include renovations, modernizations, and new construction on the campus, in addition to the demolition of non-contributing buildings and structures. The Proposed Project includes the demolition of one modular Building D and eleven portables that are located outside of the historic district (see Figure 3-6). Because Building D and the portable buildings are located outside of the historic district, the overall integrity of the historic district would be retained following implementation of the Proposed Project. The historic district would remain eligible for listing in the California Register and for designation as a City of Santa Monica Landmark under Criteria 1/1 and 3/4-5. Therefore, the Proposed Project would not result in the demolition of a significant resource. The historic district would retain eligibility following demolition of Building D.

The Proposed Project involves the construction of two new two-story classroom building that would replace the 11 portable classrooms and would be constructed in the location of the former parking lot. The new classroom building would be located outside of the historic district, to the east of Buildings B and C, and sited on Chelsea Avenue along the northeastern perimeter of the campus.

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The on-site historical resources (see Figure 3-6) would be susceptible to vibration impacts. As described in Section 5.10, Noise, the FTA vibration damage criterion for historical structures is 0.12 in/sec PPV, which this analysis uses as the limit for to identify impact significance. However, all construction equipment that is anticipated to be used within 25 feet of these historical resources would generate vibration levels similar to those identified in Table 5.10-9 and would not involve the use of a vibratory roller. Therefore, vibration levels would be less than 0.12 in/sec PPV at the historical structural facades. Impacts would be less than significant.

The new classroom building would be visible from the northeast edge of the campus along Chelsea Avenue. The view of the school would be altered from the public right-of-way along this street, as the new building would be placed in front of the historic wing of Building C. Building C would remain intact but would be sited behind the new building. New construction would not disrupt or alter the appearance of the campus along Santa Monica Boulevard. The primary façade of Building C, which faces onto Santa Monica Boulevard, served as the historic primary entrance to the campus. This region of the campus also features the Santa Monica Boulevard Quad, which maintains original landscaping and circulation paths. The campus would continue to retain its historic appearance from the public right-of-way along Santa Monica Boulevard.

The new classroom building would be compatible in size, scale, proportion, and massing to Buildings B and C. With a proposed height of approximately 38 feet the new classroom building would be shorter than Building B and C. The new building would therefore be comparable to the existing buildings' height and would not introduce substantial new verticality to the site. The front arched loggia of the classroom building would have a height of approximately 22 feet and would be modest in scale as viewed from the sidewalk on Chelsea Avenue.

The new classroom buildings would have a 32-foot separation from Buildings B and C; this space would be landscaped to serve as a new East Courtyard. The new classroom buildings would be constructed as a separate and distinct building that would be physically and visually separated from the new courtyard. The historic facades of Buildings B and C would continue to be visible from the new courtyard. Physical connection of the new classroom buildings to existing Buildings B and C would be limited to connecting open walkways attached at the second floor. Both walkways would attach with minimal intrusion or alteration of the contributing buildings. As such, the new construction does not substantially alter or destroy historic materials, features, or affect important spatial relationship between contributing buildings.

The new classroom buildings would be compatible with historic design, style, and materials on the campus. The new buildings would have simple, opaque white surfaces, gable terra cotta roofs, and arched loggias. The contributors to the historic district and new construction exhibit similar designs with low massing, smooth surfaces, and decorative detailing.

New building construction would be outside of the historic district and is separated from contributors to the historic district by open spaces and/or landscaping. New work would be differentiated from the old and would be compatible with the historic materials, features, size, scale and proportion, and massing. The essential form and integrity of the historic district would be unimpaired if the new construction were removed in the future.

The Proposed Project would renovate the library and administration spaces in Building C a contributor to the historic district. An addition would also be added on the northwest façade of Building C to accommodate a new elevator and stair core for Buildings B and C. Alterations would include the replacement of some

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nonoriginal windows and doors. Otherwise, the renovations are limited to interior work, and the Proposed Project would not increase the library area size. Improvements would be limited to new floor framing, new ceiling and casework, upgraded lighting, new electric and data systems, and modifications to the heating ventilation air conditions (HVAC) system. As such, these renovations would be minimal to Building C's historic fabric.

The Proposed Project would retain the character-defining features on contributing buildings and would preserve those features which convey the school's historical and architectural values. Therefore, the Proposed Project would not result in a major change to the physical significance of contributors to the historic district on the Proposed Project's Site.

The Proposed Project does not propose any demolition, construction, or rehabilitation that reduces the integrity or significance of the property at 1343-1345 Chelsea Avenue. While the property at 1343-1345 Chelsea Avenue is located within close visual proximity to the Proposed Project's Site, the Proposed Project is not proposing significant height or density that would impact the setting or other characteristics of the property. The proposed new construction is two-stories in height and would be compatible with the historic materials, features, size, scale and proportion, and massing the existing resources on-site. The Proposed Project's Site would retain an educational use, and its character-defining features would be visible from the public right-of-way. The Proposed Project's Site would maintain the same relationship with the surrounding neighborhood as it did historically in the 1920s. The Proposed Project would not affect nearby historic resources' eligibility for listing at the federal, State, or local levels.

Implementation of the Proposed Project would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the historic district. Therefore, impacts to historical resources would be **less than significant**.

Impact 5.3-2: The Proposed Project would not cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5.

The SCCIC records search results indicate that no previously conducted studies or previously recorded archaeological sites were identified within the campus. Only built-environment features have been identified within the half-mile search radius. Although the majority of the campus has already been subjected to grading activities associated with existing development, the campus may still contain buried deposits in undeveloped areas and in sediments that are located beneath the previous level of disturbance. Construction of the Proposed Project would involve ground disturbance, earthwork, and excavation across portions of the site. Therefore, there is a potential for unknown buried resources to be uncovered during ground-disturbing activities, and impacts are considered **potentially significant**. Implementation of **Mitigation Measure CUL-1** would reduce impacts to less than significant levels.

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5.3.4 Mitigation Measures

Impact 5.3-2

CUL-1 Prior to issuance of any permits allowing ground-disturbing activities for the Project (for each individual phase of the Project), the District shall ensure that an archaeologist who meets the Secretary of the Interior's standards for professional archaeology has been retained for the Project and will be on-call during all grading and other significant ground-disturbing activities. The Qualified Archaeologist shall ensure that the following measures are followed for the Project:

- Prior to any ground disturbance, the Qualified Archaeologist, or their designee, shall provide worker environmental awareness protection training to construction personnel regarding regulatory requirements for the protection of cultural (prehistoric and historic) resources. As part of this training, construction personnel shall be briefed on proper procedures to follow should unanticipated cultural or paleontological resources be made during construction.
- In the event that a prehistoric archeological site (such as any unusual amounts of stone, bone, or shell) or a historic-period archaeological site (such as concentrated deposits of bottles or bricks, amethyst glass, or other historic refuse), is uncovered during grading or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted. The District shall be notified of the potential find and a qualified archeologist shall be retained to investigate its significance.
- If significant Native American cultural resources are discovered for which a treatment plan must be prepared the project applicant or the archaeologist on call shall contact the applicable Native American tribal contact(s). If requested by the Native American tribe(s), the project applicant or archaeologist on call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, reburial, return of artifacts to tribe).
- Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.

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5.3.5 Level of Significance After Mitigation

Mitigation Measure CUL-1 would be implemented as part of the Proposed Project and would require cultural resources sensitivity training for construction workers, avoidance of any previously unidentified archaeological sites, and appropriate treatment of unearthed archaeological resources during construction. Potential impacts to unknown resources would be mitigated to **less than significant** through the implementation of **Mitigation Measure CUL-1**.

5.3.6 Cumulative Impacts

Development of the Proposed Project and related projects have the potential to encounter and potentially degrade historic resources and cultural resources. However, similar to the Proposed Project, each related project would be expected to comply with PRC Section 15064.5, perform site-specific cultural analyses, implement mitigation measures if needed, and comply with other applicable regulatory compliance measures. The Proposed Project would not result in an adverse change in the significance of a historical resource. The Proposed Project's Site does not contain known archeological resources or human remains. However, because the Proposed Project would conduct earthwork activities on previously undisturbed portions of the Proposed Project's Site, the Proposed Project would require mitigation measures to minimize its impact to potential archeological materials to a less than significant level and reduce the potential for the project to contribute to cumulative impacts to cultural resources. Therefore, the Proposed Project's contribution to cumulative cultural resource impacts would be considered less than cumulatively considerable, and the Proposed Project's impacts would be **less than significant**.

5.3.7 References

- Cogstone. 2022, August. *Archaeological and Paleontological Resources Assessment for the McKinley Elementary School Campus Master Plan Project, City of Santa Monica, Los Angeles County, California*.
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- National Park Service (NPS), 2010, *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns*, by Anne E. Grimmer and Kay D. Weeks, Washington, DC, August
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