

IV.D.3 Historical Resources

1.0 INTRODUCTION

This section describes historic resources on the Loyola Marymount University (LMU) campus and discusses potential direct and indirect impacts to those resources due to implementation of the Proposed Project. The following analysis is based on a historic resources assessment prepared by Historic Resources Group, LLC, dated 2009, and included as **Appendix IV.D.3**.

2.0 REGULATORY FRAMEWORK

2.1 Federal Regulations

2.1.1 National Register of Historic Places

The National Register of Historic Places (National Register) is the nation's master inventory of known historic resources and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. The National Park Service administers the National Register program.

To be eligible for listing in the National Register, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. A structure, site, building, district or object can be considered significant and eligible for listing on the National Register if it meets one or more of the following four criteria:

- Criterion A: Is associated with events that have made a significant contribution to the broad patterns of history (such as a Civil War battlefield or a Naval Ship building Center);
- Criterion B: Is associated with the lives of persons significant in our past (such as Thomas Jefferson's Monticello or the Susan B. Anthony birthplace);
- Criterion 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 (such as Frank Lloyd Wright's Taliesin or the Midwestern Native American Indian Mounds); or
- Criterion D: Has yielded or may likely yield information important in prehistory or history (such as prehistoric ruins in Arizona or the archaeological sites of the first European settlements in St. Augustine, Florida or at the Presidio of San Francisco).

2.1.1.2 **Period of Significance**

For any resource eligible for listing in the National Register its period of significance must also be established. According to National Register Bulletin 16A, the period of significance is defined as the length of time that a property was associated with important events, activities, or persons, or attained the characteristics that qualify it for National Register listing. The following guidelines have been established to define the period of significance for resources meeting one or more of the four criteria of historical significance:

- Criterion A: For the site of an important event, such as a pivotal five-month labor strike, the period of significance is the time when the event occurred. For properties associated with historic trends, such as commercial development, the period of significance is the span of time when the property actively contributed to the trend.
- Criterion B: The period of significance for a property significant for Criterion B is usually the length of time the property was associated with the important person.
- Criterion C: For architecturally significant properties, the period of significance is the date of construction and/or the dates of any significant alterations and additions.
- Criterion D: The period of significance for an archeological site is the estimated time when it was occupied or used for reasons related to its importance, for example, 3000–2500 B.C.

2.1.1.3 **Integrity**

In addition to meeting any or all of the criteria of historical significance, integrity, or the ability of a property to convey its significance, must be present in order for a property to be eligible for listing in the National Register. National Register Bulletin 15 recognizes seven aspects of integrity, which are defined below.

- Location: Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design: Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting: Setting is the physical environment of an historic property.
- Materials: 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 an historic property.
- Workmanship: Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or pre-history.

- Feeling: Feeling is a property's expression of the aesthetic or historical sense of a particular period of time.
- Association: Association is the direct link between an important historic event or person and an historic property.

According to National Register Bulletin 15, Section VIII, historic properties either retain integrity (that is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognize the seven aspects or qualities listed above that, in various combinations, define integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects.

2.1.1.3 Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as districts. The National Park Service defines an historic district in National Register Bulletin 15 as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”

2.1.2 The Secretary of the Interior’s Standards for Rehabilitation

The *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* were published in 1995 and codified as 36 CFR 67.¹ Neither technical nor prescriptive, these standards are intended to promote responsible preservation practices that help protect irreplaceable cultural resources.² The Secretary of the Interior's Standards for Rehabilitation (Secretary’s Standards, or Standards) consist of 10 basic principles created to help preserve the distinctive character of a historic building and its site while allowing for reasonable change to meet new needs. The Standards apply to historic buildings of all periods, styles, types, materials, and sizes, and apply to both the exterior and the interior of historic buildings. The Standards also encompass related landscape features and the building's site and environment, including attached, adjacent, or related new construction. The Standards have been adopted, or are used informally, by many agencies at all levels of government to review projects that affect historic resources.

¹ “Preservation” acknowledges a resource as a document of its history over time and emphasizes stabilization, maintenance, and repair of existing historic fabric. “Rehabilitation,” while also incorporating the retention of features that convey historic character, also accommodates alterations and additions to facilitate continuing or new uses. “Restoration” involves the retention and replacement of features from a specific period of significance. “Reconstruction,” the least-used treatment, provides a basis for recreating a missing resource.

² Weeks, Kay D. and Anne E. Grimmer. 1995. *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction Historic Buildings*. Washington D.C.: U.S. Department of the Interior, National Park Service.

The Secretary of the Interior's Standards are used as a measure in determining whether or not a project or new development or rehabilitation adversely impacts a historic resource. The Secretary of the Interior's Standards state:

1. A property shall be used as its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of distinctive materials or alteration of features, and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture and other visual qualities and, where possible, materials. Replacement of missing features will be substantiated by documentary, physical or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Infill and redevelopment projects that could affect historic resources may be subject to review based on Standards 9 and 10 of the Standards, which state:

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 integrity of the property and its environment.
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.

2.2 State Regulations

2.2.1 CEQA Guidelines

The determination of historical significance is discussed in advance of the evaluation of project impacts to first establish whether or not any building or object on the campus, either individually or collectively, qualifies as a historic resource under CEQA. Section 15064.5(a) of the *State CEQA Guidelines* provides the following guidelines for determining whether a property is a historic resource, and therefore significant, for purposes of CEQA:

- A resource listed, or determined to be eligible by the State Historical Resources Commission for listing, in the California Register is considered an historic resource.
- A resource included in a local register of historic resources, as defined in Section 5020.1(k) of the Public Resources Code, or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant, unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.
- The fact that a resource is not listed, or determined to be eligible for listing, in the California Register, not included in a local register of historical resources, or not identified as significant in an historical resources survey does not preclude a lead agency from determining that the resource may be an historical resource, as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

According to Section 15064.5(b) of the *State CEQA Guidelines*, a substantial adverse change in the significance of a historic resource is defined as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired. Material impairment occurs when a project:

- 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;
- 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

- Demolishes or materially alters in an adverse manner those physical characteristics of an 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.

CEQA regulations identify the Secretary of the Interior's Standards as a measure to be used in determining whether or not a project of new development or rehabilitation adversely impacts an historic resource. Section 15064.5(b)(3) of the *State CEQA Guidelines* states, "Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards, Weeks and Grimmer, 1995) shall be considered as mitigated to a level of less than a significant impact on the historic resource."³

2.2.2 California Register of Historical Resources

The California Register of Historical Resources (California Register) is the authoritative guide to the state's significant historical and archeological resources. It serves to identify, evaluate, register, and protect California's historic resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance, identifies historic resources for state and local planning purposes, determines eligibility for historic preservation grant funding, and affords certain protections under CEQA.

The California Register automatically includes the following:

- California properties listed or formally determined eligible for listing in the National Register of Historic Places;
- California Registered Historical Landmarks from #0770 onward; and
- California Points of Historical Interest that have been evaluated by the Office of Historical Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion in the California Register.

³ While compliance with the Secretary's Standards indicates that a project may have a less than significant impact on an historical resource, the converse of this does not hold. Failure to comply with the Secretary's Standards is not, by definition, a significant impact under CEQA. CEQA recognizes that alterations that are not consistent with the Secretary's Standards may still not result in significant impacts on the historical resource.

Resources that are not automatically listed in the California Register must be nominated for listing through an application and public hearing process. They must also meet one or more of the following four criteria, which are based upon the four National Register criteria:

- Criterion 1: 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.
- Criterion 2: Is associated with the lives of persons important to local, California, or national history.
- Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.
- Criterion 4: Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state or the nation.

As with the National Register, all properties eligible for listing on the California Register must retain historic integrity in terms of location, design, setting, materials, workmanship, feeling, and association. Most resources must also be at least 50 years old; however resources less than 50 years in age may be eligible for listing on the California Register if it can be demonstrated that sufficient time has passed to understand their historical importance.

2.2.3 Assembly Bill 133

California Assembly Bill 133 exempts non-commercial property owned by specified religiously affiliated associations or corporations from local landmarks laws. Such property may include religiously affiliated hospitals, schools, and community charity centers, as well as residential, recreational and other properties owned by religious institutions. In order to invoke the exemption, the religiously affiliated organization must formally object to the application of the law, and determine in a public forum that application of the law will result in a substantial hardship, which is likely to deny the organization either an economic return on its property, the reasonable use of its property, or the appropriate use of its property.

2.3 Local Regulations City of Los Angeles

2.3.1 City of Los Angeles Historic-Cultural Monument Designation

The City of Los Angeles Cultural Heritage Ordinance, enacted in 1962, facilitates the designation of buildings and sites within the City as Historic-Cultural Monuments. The City's Cultural Heritage

Commission oversees the designation and protection of these local landmarks. Article 4, Section 22.130 of the City of Los Angeles Administrative Code defines a historical or cultural monument as:

Any site (including significant trees or other plant life located thereon) building or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state or local history or which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age.

Designation of a Historic-Cultural Monument recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Cultural Heritage Commission review is required for proposed exterior and interior alterations to Historic-Cultural Monuments in accordance with the Secretary of the Interior's Standards for Rehabilitation, the nationally accepted criteria for evaluating change to historic properties.

2.3.2 City of Los Angeles Historic Preservation Overlay Zones

The Historic Preservation Overlay Zones (HPOZ) Ordinance (Section 12.20.3 of the Los Angeles Municipal Code) was adopted by the Los Angeles City Council in 2004. A designated Historic Preservation Overlay Zone may apply to any area of the City of Los Angeles containing structures, landscaping, natural features, or sites having historic, architectural, cultural, or aesthetic significance. The purpose of a Historic Preservation Overlay Zone is to:

- Protect and enhance the use of structures, features, sites and areas that are reminders of the City's history or which are unique and irreplaceable assets to the City and its neighborhoods or which are worthy examples of past architectural styles;
- Develop and maintain the appropriate settings and environment to preserve these structures, landscaping, natural features, sites, and areas;
- Enhance property values, stabilize neighborhoods, and/or communities, render property eligible for financial benefits, and promote tourist trade and interest;
- Foster public appreciation of the beauty of the City, of the accomplishments of its past as reflected through its structures, landscaping, natural features, sites and areas;
- Promote education by preserving and encouraging interest in cultural, social, economic, political and architectural phases of its history; and
- To ensure that all procedures comply with the California Environmental Quality Act.

There are currently 24 Historic Preservation Overlay Zones in Los Angeles ranging in size from 26 properties in the Vinegar Hill Historic Preservation Overlay Zone to over 2,000 properties in the Highland Park Historic Preservation Overlay Zone. Currently, 15 more Historic Preservation Overlay Zones are proposed. No existing or proposed Historic Preservation Overlay Zone overlies the campus.

3.0 EXISTING CONDITIONS

3.1 History of Westchester-Playa del Rey

The area that would become Westchester and Playa del Rey began the 20th century as an agricultural area, growing a wide variety of crops including wheat, barley, and lima beans. The area remained rural until 1941, when developer Fritz Burns developed a tract of inexpensive prefabricated single-family homes on the site of a former farm at the intersection of Manchester and Sepulveda Boulevards. This community, named "Westchester," was strategically located near several aviation firms associated with Mines Field (later Los Angeles International Airport, or LAX). Westchester was also home to Hughes Electronics Corporation's corporate headquarters.⁴

When the aerospace industry boomed during World War II and the post-War years, Westchester grew with it. The return of war veterans and need for expanded aircraft and related industries during and after World War II created a tremendous expansion of development in the Westchester-Playa del Rey area. By 1948, approximately 30,000 people were living in the area, creating an urgent need for additional housing and commercial uses. In response, developer Henry Kaiser completed 7,000 dwelling units near the intersection of La Tijera Boulevard and Manchester Avenue in 1950, with similar subdivision development continuing through the 1950s and '60s. Today, only a small portion of Westchester-Playa del Rey remains undeveloped.

3.2 History of the LMU Westchester Campus

3.2.1 Founding of Westchester Campus, 1928-1930

The present Loyola Marymount University is the successor to St. Vincent's College for boys, the first institution of higher learning in Los Angeles, founded in 1865. St. Vincent's College was folded into the newly founded Los Angeles College in 1911, which was followed by expansion to a new campus in 1917. In 1918, the name was changed to Loyola College of Los Angeles. Graduate education was introduced in 1920 with the foundation of a separate Law School.

⁴ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, (2009).

LMU's Westchester campus was founded in 1928, when real estate developer Harry Culver offered Loyola College approximately 100 acres of land on a high bluff overlooking the Pacific Ocean. Loyola College quickly announced ambitious plans for a new campus and broke ground on May 20, 1928.

Original architectural plans developed by Thomas Franklin Power feature Tudor-Gothic building styles and a north-south central spine traversing the campus. By October 1928, a new plan completed by architect David Elms Graham featured Spanish-Colonial building styles. The plan enhanced the originally-proposed cross-axial alignment of structures on campus by narrowing the central spine and establishing a formal green space perpendicular to the central spine within the center of Campus. The siting of a church at the terminus of the central spine remained from Power's original plan.

Construction of the first two buildings on campus, both of which were designed by Graham, was completed in 1929. One was designed to contain administrative offices and housing for the resident Jesuit community. First referred to as the Faculty Building, it was eventually named Xavier Hall and is sited in the northwestern corner of the original campus. A second building, first referred to as the Arts Building and eventually named St. Robert's Hall, contained classrooms and lecture halls. The letter "L" located on the bluff below Xavier Hall was established in 1929. In 1930, Loyola College achieved university status to become known as Loyola University.

3.2.2 The Great Depression, World War II and the Post-War Period, 1930-1949

The 1929 stock market crash and subsequent Depression curtailed Loyola University's initial building program. Enrollment increased in 1939, but declined again with the advent of World War II. Immediately after the war, returning servicemen resulted in an increase in the student body to almost 1,800 students. To accommodate the influx of veterans, temporary buildings were constructed to provide classroom and laboratory facilities. During and immediately after World War II noted Southern California architect Wallace Neff became involved with the campus. A well-known architect in Southern California, Neff is generally credited with creating a romanticized regional style that would define Southern California architecture during the first half of the twentieth century. In addition to temporary campus structures, Neff designed two single-story dormitory buildings (Huesman and Sullivan Halls) in 1947. The U-shaped buildings are oriented towards each other around a central green space. Neff also designed the Memorial Gymnasium, the campus's first gym building, in 1948. The Memorial Gymnasium was demolished in 2000.

By 1950, much of the original 1928 campus plan had been abandoned, with the placement and orientation of the Wallace Neff dormitories and gym deviating from the plan. The athletic fields had been placed in the southeastern portion of the campus, also a substantial change from the original 1928 plan. However,

the basic circulation pattern, with its north-south central axis, cross-axial pathways, and U-shaped outer road, was maintained, but is more oriented toward automobile circulation (and parking) than what was envisioned in 1928.

3.2.3 Mid-Century Development and Growth, 1950-1967

Loyola University continued to develop its campus into the 1950s. A master plan, dated 1951 and credited to George De Masirevich, proposed extensive academic, housing and athletic facilities, but nothing from the plan appears to have been realized.

A defining feature of Loyola University's original plan was realized when Sacred Heart Chapel was constructed in 1953. Designed by Los Angeles architects M.L. Barker and G. Lawrence Ott, Sacred Heart Chapel became the terminus and focal point of the campus's central spine first envisioned in 1928. It also provided an appropriate location to hold religious services.

In 1954, a new plan for the further growth and development of the campus was developed by San Francisco landscape architect and planner Prentiss French. French's plan placed buildings to reinforce the symmetrical, cross-axial orientation of the campus and to define important public spaces. The French plan also reconciled vehicle and pedestrian circulation patterns and parking areas. French designed the semi-hexagonal Sunken Garden directly south of Sacred Heart Chapel and Regent's Terrace, a raised plaza marking the transition from the Sunken Garden to the central spine that would later become known as the Alumni Mall.

In 1955, the Pereira Hall of Science and Engineering (Pereira Hall) was constructed in accordance with French's master plan. The modern, U-shaped building, designed by Los Angeles architect C.B. Williams, was the Loyola University's first substantial academic structure to be built since the original buildings in 1928. Pereira Hall's modernist style signaled the Loyola University's shift from the traditional architectural styles of the earlier buildings to more modern architectural styles that would continue into the 1970s.

In 1956, the Los Angeles architectural firm A.C. Martin and Associates was retained to help realize Loyola University's expansion goals. A.C. Martin and Associates was instrumental in establishing modern Los Angeles after World War II and designed some of the first modern high-rise buildings in downtown Los Angeles. A.C. Martin designed six buildings for Loyola University between 1958 and 1965. These included the Malone Memorial Student Center in 1958; a three-building dormitory complex (Desmond Hall, Rosecrans Hall, and Whelan Hall) constructed between 1958 and 1965; the Charles Von der Ahe Library in 1959; and the Seaver Science Hall in 1962. These buildings were constructed on building pads sited by the French master plan and designed in the modernist architectural styles

characteristic of the mid-20th century. The transformation to a modern campus was complete with the construction in 1962 of the Edward T. Foley Center (also called the Foley Hall of Communication, or Foley Hall), including the Strub Memorial Theater, designed by New York architect Edward Durrell Stone.

3.2.4 Affiliation and Merger with Marymount College, 1968-1989

In 1967, a cooperative agreement was announced between Loyola University and Marymount College, a women's college founded in Westwood in 1923 and relocated to Palos Verdes. Under the agreement, the smaller Marymount College would relocate to Loyola University's campus, where both institutions would maintain separate identities but share faculty and facilities. In response, Loyola University quickly constructed new facilities to accommodate the increase in students. These facilities included the Leavey Center, designed by John Galbrith and Associates, which provided living quarters and offices for Marymount faculty and staff, and McKay Hall, which provided housing for Marymount students. Both buildings were completed in 1968. Additionally, the Von der Ahe Communication Arts Complex, completed in 1971, provided faculty offices, classrooms, workshops, film and television studios and a theater for the Communication Arts Department. It was designed by the architectural design department of the Bechtel Corporation. In 1972, the northern half of the campus' central spine was closed to automobiles and landscaped to form the pedestrian-oriented Alumni Mall. Additional residential facilities as well as small academic spaces were also constructed on campus during this time.

In 1973, after five years of affiliation and shared resources, Loyola University and Marymount College announced a merger to form a single institution, Loyola Marymount University. The merger did not immediately result in substantive changes to the campus; the Hannon Apartments were subsequently built in 1978 to provide additional student housing. The Van der Ahe Library was expanded that same year, nearly doubling its size.

Athletic facilities were enhanced with the opening of the Albert Gersten Pavilion in 1982. Built to accommodate the 1984 Summer Olympic Games in Los Angeles, the Pavilion hosted the weightlifting competition during the Games. The Gersten Pavilion was built directly adjacent to the 1948 Memorial Gymnasium. In 1983, the George C. Page Baseball Stadium was built on the site of the original ball field.

Other additions to the campus included the Fritz Burns Fine Arts Center, which was constructed in 1983. Designed by A.C. Martin and Associates, the center combined four buildings around a series of courtyards and outdoor spaces. Sited on the southwestern end of Alumni Mall, the Burns Center completed the core of buildings immediately adjacent to the Mall. In 1985, an additional building, or annex, was added onto the western side of the Pereira Hall of Science and Engineering; the additional

building was renamed Doolan Hall in 1991. In 1986, the Doheny Residence Hall was built between Huesman and Sullivan Halls.

3.2.5 Campus Expansion, 1990-Present

The 1990s ushered in a period of significant building and expansion for the campus. Major projects during this period included the four-story, 88,000-square-foot Conrad N. Hilton Center for Business, which was opened in 1995 to house the College of Business Administration.

During the 1990s, LMU also began developing the 27.5-acre vacant parcel immediately west of the main campus that had been acquired in 1983, referred to since its acquisition as the Leavey Campus portion of the LMU campus. Development on this parcel includes the Drollinger Parking Plaza structure topped by the Leavey intramural field on the roof deck, constructed in 1995, and a grouping of student residence halls designed by architect David J. Flood and constructed between 1996 and 2005. On the area formerly known as the Burns Campus, Flood also designed the Jesuit Community Residences adjacent to Xavier Hall in 1999 and the Del Rey North and South Residential Halls in 2005. The William H. Hannon Library is presently under construction in the northwestern portion of campus and is expected to open in Fall 2009.

In 1996, the Malone Memorial Student Center, originally constructed in 1958, was renovated and expanded by 19,000 square feet. The building's mid-century exterior was refurbished to approximate more traditional architectural styles. In 2000, the 1948 Memorial Gymnasium was demolished and replaced with the Burns Recreation Center to increase LMU's athletic facilities.

In 2000, LMU also acquired the portion of campus formerly known as the Hughes Campus, which included the long-vacant 680,000-square-foot office building and surrounding land west of Leavey Campus, originally occupied by the Hughes Electronics Corporation's headquarters, constructed in 1985.⁵ Designed by Skidmore, Owings and Merrill and constructed in the 1980s, the rectangular, glass and steel structure was converted for academic and administrative purposes and renamed University Hall. A pedestrian bridge linking the property to the Leavey portion of campus was also added. The acquisition of University Hall allowed LMU to relocate its main entrance to Lincoln Boulevard by extending the former Hughes Terrace (renamed LMU Drive) to the Leavey and Burns portions of the campus.

⁵ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, (2009); "Completion Nearing on Hughes Headquarters" *Los Angeles Times*, Los Angeles County Edition, September 15, 1985; Ramos, Georg., "School With a View: Loyola Marymount remakes the bluff-top former world headquarters of Hughes Aircraft", *Los Angeles Times*, Los Angeles County Edition, January 22, 2001.

4.0 IMPACT ANALYSIS

4.1 Methodology

The information contained in this section is derived from an historic resources assessment of the LMU campus prepared by Historic Resources Group, LLC, in 2009.⁶ This technical report is provided in **Appendix IV.D.3** of this EIR. The methodology employed in the report includes archival research, field observations and evaluation according to applicable criteria of the National Register of Historic Places and the California Register of Historical Resources. The analysis focuses on exterior architectural features, landscape characteristics, public spaces and the spatial organization of the campus.

4.2 Significance Thresholds

The *Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on historical resources if it would result in:

- HIST-1 Demolition of a significant resource;
- HIST-2 Relocation that does not maintain the integrity and significance of a significant resource;
- HIST-3 Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- HIST-4 Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Appendix G of the State *CEQA Guidelines* provides sample questions for use in an initial study to determine a project's potential for environmental impacts. According to the sample questions⁷ included in Appendix G under Section V, Cultural Resources, a project would have a potentially significant impact if it would:

- V.a) Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5.

⁶ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, (2009).

⁷ The remainder of the Appendix G Cultural Resources sample questions (V.b, -c and -d) pertain to paleontological and archaeological resources and are addressed in **Sections IV.D.1, Paleontological Resources**, and **IV.D.2, Archaeological Resources**, respectively.

Section 15064.5(b)(1) states that in determining potential impacts a “substantial adverse change” means “demolition, destruction, relocation, or alterations of the resource such that the significance of an historical resource would be materially impaired.” The setting of a resource may also contribute to its significance, as impairment of the setting could affect the significance of that resource. Material impairment occurs when a project:

- 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
- 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
- Demolishes or materially alters in an adverse manner those physical characteristics of an 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.

The City of Los Angeles historical resource significance thresholds are inclusive of the sample questions provided in Appendix G of the *State CEQA Guidelines*. Therefore, thresholds **HIST-1** through **HIST-4**, above, are used for the following analysis of the Proposed Project’s potential impacts.

4.3 Project Design Features

Xavier Hall, St. Robert’s Hall, Sacred Heart Chapel, and the bluff-face letter “L” would be retained under the Proposed Project. Any renovations that would be made to these historic resources would be made in compliance with the Secretary of the Interior’s Standards.

4.4 Project Impacts

- | | |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HIST-1 | Would impacts related to historic resources be significant based on the demolition of a significant resource? |
| HIST-2 | Would impacts related to historic resources be significant based on relocation that does not maintain the integrity and significance of a significant resource? |

4.4.1 Identification of Campus Historical Resources

As discussed above, a resource is considered historically significant under CEQA if it is listed, or determined to be eligible for listing, in the California Register; included in a local register of historic

resources; or determined to be significant either in an historic resource survey or by a lead agency if substantial evidence of historical significance exists. No resource or resources contained within the LMU campus are currently listed in, nor have any been determined eligible for listing in, the National Register or the California Register.⁸ Similarly, no resource or resources have been designated as a Los Angeles City Historic-Cultural Monument, nor identified as eligible for listing in a local survey.⁹

The original Burns Campus contains nine buildings and one landscape object that are 50 years in age or older. The Hughes and Leavey portions of the LMU campus were not developed until the 1980s and 1990s, respectively, and therefore do not contain resources 50 years or older. Since a resource that is at least 50 years of age may be considered for listing on both the National and California Registers and since the 50-year threshold has become a standard baseline for screening properties for potential historic significance, on-campus resources constructed on or before 1958 are evaluated in this section. The National Register states that a property that has achieved significance within the past 50 years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. Therefore, a resource less than 50 years in age could meet specific criteria for historical significance and qualify as an historic resource under CEQA. Several buildings constructed after 1958 were designed by master architects and, for this reason, are evaluated to determine if they may be considered historic resources under CEQA.

Any distinguished persons and their academic accomplishments that are associated with LMU are understood to be associated with the university as a whole and not with individual campus buildings or sites. No specific building or site on the LMU campus was found to be individually associated with important administrators, faculty, or students and/or the academic achievements of such persons.¹⁰

All on-campus resources surveyed are identified in **Table IV.D.3-1, Resources Surveyed to Determine Historical Significance**, below. Photographs of buildings constructed between 1929 and 1959 and one object (the bluff face letter “L”) are provided in Appendices A and B of the *Historical Resources Assessment* located in **Appendix IV.D.3**.

⁸ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 10-11.

⁹ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 11. Many local municipalities, like the City of Los Angeles, opt to conduct local surveys of historical resources in their City to evaluate the existence of potentially eligible resources.

¹⁰ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 32.

**Table IV.D.3-1
Resources Surveyed to Determine Historical Significance**

Construction Date	Resource	Type	Architect
1929	Xavier Hall	Building	David Elms Graham
1929	St. Robert's Hall	Building	David Elms Graham
1929	Bluff-Face Letter "L"	Object	--
1947	Huesman Hall	Building	Wallace Neff
1947	Sullivan Hall	Building	Wallace Neff
1953	Sacred Heart Chapel	Building	M.L. Barker & G. Lawrence Ott
1955	Pereira Hall of Science and Engineering	Building	C.B. Williams
1958	Desmond Hall	Building	A.C. Martin and Associates
1958/1996 ¹	Malone Memorial Student Center	Building	A.C. Martin and Associates
1959	Charles Von der Ahe Library	Building	A.C. Martin and Associates
1962	Seaver Science Hall	Building	A.C. Martin and Associates
1962	Edward T. Foley Center	Building	Edward Durrell Stone
1962	Rosecrans Hall	Building	A.C. Martin and Associates
1965	Whelan Hall	Building	A.C. Martin and Associates

Source: *Historic Resources Group, LLC, (2009) 25-26.*

¹ A significant alteration to the Malone Memorial Student Center was undertaken in 1996.

4.4.1.1 Resources 50 Years of Age and Older

4.4.1.1.1 Xavier Hall (1929)

Xavier Hall was the first building constructed on campus. It was designed by David Elms Graham in accordance with his 1928 plan and originally contained administrative offices and housing for faculty and students. This T-shaped building was designed in a restrained, Mediterranean-Revival style with a formal entrance portal and decorative surround; the main building varies between two and three stories with a two-story addition at the edge of the bluff. A single-story section extends perpendicular to the main building at its southern end. A small extension was added in 1959 to house a dining room. A separate but connecting Jesuit Residence building was added to the northwest of Xavier Hall in 1999.

4.4.1.1.2 St. Robert's Hall (1929)

St. Robert's Hall, also designed by Graham, was the second building constructed on campus. It was originally referred to as the Arts Building and contained classrooms, a lecture hall, and office space. The L-shaped building was designed in a modified Spanish Colonial Revival style with a hipped roof of red

tiles, central entry portals, and symmetrical fenestration; the main building is three stories tall with a single-story addition at the western end.

4.4.1.1.3 Letter “L” (1929)

The letter “L” in the “LMU” logo situated on the bluff-face below Xavier Hall was installed in 1929 and has served as an important visual identifier for LMU from vantage points to the north. The letters “M” and “U” were added after Loyola University merged with Marymount College in 1973.

4.4.1.1.4 Sacred Heart Chapel (1953)

Sacred Heart Chapel was the first building on campus dedicated to religious services. By providing a proper location for services, the Chapel reinforced LMU’s identity as a Catholic-affiliated institution of higher learning. As the focal point to the campus’s central spine, the Chapel also realized the campus plan first envisioned in 1928. The Chapel was designed in 1953 by noted architects M.L. Barker and G. Lawrence Ott in an eclectic, Mediterranean style with a symmetrical, stepped southern facade distinguished by a tripartite, arched entry, and central circular window. Memorial Tower, a slender clock tower, sits alongside the Chapel on its eastern side. The Chapel interior features 29 stained glass windows depicting Jesuit saints and the seals of 27 Jesuit colleges and universities. Barker and Ott worked in a variety of architectural styles, often for church-affiliated projects. Important works include the Chapel and Faculty building at Mount St. Mary’s College in Brentwood (1939–1940) and Saint Anthony’s Church in Long Beach (1952).

4.4.1.1.5 Pereira Hall of Science and Engineering (1955)

The Pereira Hall of Science and Engineering (Pereira Hall) was designed by Los Angeles architect C.B. Williams in a modern style typical of mid-twentieth century commercial and institutional buildings. Pereira Hall was constructed in 1955 in accordance with French’s master plan. The modern, U-shaped building was Loyola University’s first substantial academic structure to be built since the original buildings in 1928. Pereira Hall’s modernist style signaled LMU’s shift from the traditional architectural styles of the earlier buildings to more modern architectural styles that would continue into the 1970s.

4.4.1.1.6 Desmond Hall (1958), Malone Memorial Student Center (1958/1966), Charles Von der Ahe Library (1959)

Los Angeles architectural firm A.C. Martin and Associates, headed by architects Albert C. Martin, Jr. and his brother Edward, designed seven buildings on campus between 1958 and 1983. During this period, A.C. Martin and Associates played a significant role in shaping post-World War II Los Angeles,

designing a variety of buildings from corporate skyscrapers to suburban schools. Important local designs include the May Co. Department Store on Wilshire Boulevard (1940), the Los Angeles Department of Water and Power headquarters building in downtown Los Angeles (1963), the Union Bank Building (1968), and Atlantic Richfield Plaza (1972). A.C. Martin and Associates became known for a rational and austere aesthetic associated with modernism and the International Style.

Three of the buildings designed by A.C. Martin and Associates were constructed between 1958 and 1959.

Desmond Hall was constructed in 1958. Desmond Hall is a Y-shaped building consisting of three three-story wings joined by a central pavilion. Its functional style features flat roofs, horizontal window overhangs, and brick accents. Rosecrans and Whelan Halls, two identical buildings constructed in the 1960s and also designed by A.C. Martin and Associates, flank Desmond Hall.

Malone Memorial Student Center was constructed in 1958. The Malone Memorial Student Center was designed in a modernist style typical of institutional buildings of the mid-twentieth century. The building features an irregular plan of connected, rectangular volumes two and four stories in height. An expansion completed in 1996 added additional floors and reshaped the building's exterior to approximate more traditional architectural style such that the original building can no longer be discerned.¹¹

Constructed in 1959, the Charles Von der Ahe Library just meets the 50-year threshold. The Von der Ahe Library was designed in a restrained, modernist style with simple, unadorned facades. An expansion completed in 1978 greatly increased the Library's square footage and altered much of the original building.

4.4.1.2 Application of Historical Significance Criteria

The period of significance of LMU's Westchester campus extends from 1928, when the campus plan by David Elms Graham was first announced, through 1930, when construction of the first two campus buildings was completed. This timeframe also marks the period during which Loyola University obtained full university status (obtained in 1930) and became one of several pioneer colleges and universities to locate in Los Angeles' west side during the late 1920s and early '30s as anchor institutions for further development in the Westchester area.

National Register Criterion B and California Register Criterion 2 are applied to determine if a resource is historically significant based on association with persons. Any distinguished persons and their academic accomplishments that are associated with LMU are understood to be associated with the university as a

¹¹ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 30.

whole and not with individual campus buildings or sites. No specific building or site on the LMU campus was found to be individually associated with important administrators, faculty, or students and/or the academic achievements of such persons.¹²

4.4.1.2.1 Xavier Hall (1929), St. Robert's Hall (1929), Letter "L" (1929), Sacred Heart Chapel (1953)

Xavier Hall, St. Robert's Hall, and the bluff-face letter "L" are associated with this locally historic event, and therefore appear to be significant in local history under National Register Criterion A and California Register Criterion 1 for their association with the initial planning, design, and establishment of LMU's Westchester campus.¹³ Sacred Heart Chapel is associated with the establishment of LMU's heritage as a Catholic-affiliated educational institution by being the first building on campus dedicated to religious services, therefore Sacred Heart Chapel appears to be locally significant under National Register Criterion A and California Register Criterion 1 as the first building on the Westchester campus dedicated to religious services.¹⁴ Sacred Heart Chapel also appears to be significant under National Register Criterion C and California Register Criterion 3 as an example of the work of noted Los Angeles architects M.L. Barker and G. Lawrence Ott, known for church-affiliated projects throughout Southern California.¹⁵ Therefore, Xavier Hall, St. Robert's Hall, the bluff-face letter "L," and Sacred Heart Chapel can be classified as historically significant.¹⁶ Furthermore, all four resources have retained the seven aspects of integrity: design, materials, workmanship, feeling, association, location, and setting.¹⁷ Therefore, all four resources may be eligible for listing on both the National and California Registers. All four resources also appear to be eligible for listing as a Los Angeles Historic-Cultural Monument.¹⁸ A map showing the locations of these four resources is provided on page 37 of the *Historical Resources Assessment* located in **Appendix IV.D.3**.

4.4.1.2.2 Pereira Hall of Science and Engineering (1955)

The Pereira Hall of Science and Engineering does not appear to be associated with important persons or events in history, nor is it a particularly distinctive example of type, period, region, or method of construction. Little is known about architect C.B. Williams, and no evidence was uncovered to suggest

¹² Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 32.

¹³ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 32.

¹⁴ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 34-35.

¹⁵ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 34-35.

¹⁶ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 33-35.

¹⁷ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 33-35.

¹⁸ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 35-36.

anything particularly distinguished or important about his body of work.¹⁹ For these reasons, Pereira Hall does not appear to be historically significant.²⁰

4.4.1.2.3 Desmond Hall (1958), Malone Memorial Student Center (1958/1966), Charles Von der Ahe Library (1959)

Desmond Hall does not appear to be associated with important persons or events in history nor is it a particularly distinctive example of type, period, design, or method of construction.²¹

The expansion completed in 1996 added additional floors and reshaped the Malone Memorial Student Center building's exterior to approximate more traditional architectural style such that the original modernist-style 1958 building can no longer be discerned.²²

The Von der Ahe Library does not appear to be associated with important events in history nor is the building a particularly distinctive example of type or period.²³

4.4.1.3 Resources Less than 50 Years of Age

Eight buildings listed in **Table IV.D-3-1** are less than 50 years old, but because they are associated with noted architects, they are evaluated to determine if they are historic resources under CEQA. These buildings which are less than 50 years old are: Huesman and Sullivan Halls, designed by Wallace Neff; Rosecrans Hall, Whelan Hall, and Seaver Science Hall, designed by A.C. Martin and Associates; and the Edward T. Foley Center, designed by Edward Durrell Stone. Because of the association with noted architects, these buildings are evaluated for eligible for listing in the National Register only under Criterion C and in the California Register only under Criterion 3.

4.4.1.3.1 Huesman and Sullivan Halls (1947)

Wallace Neff was an active architect on campus from the mid- to late-1940s, during which he designed several temporary buildings that have since been removed and replaced, Memorial Gymnasium, which was demolished in 2000, and the existing Huesman and Sullivan Halls. These two buildings were constructed in 1947 as simple, single-story U-shaped buildings combining elements of Spanish Colonial, Mediterranean, and modern styles. The twin buildings feature stucco cladding, gabled roofs, and

¹⁹ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 26.

²⁰ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 26.

²¹ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 30.

²² Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 30.

²³ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 30.

semicircular extensions at the ends of each wing. The buildings are oriented around a central green space, where slender columns support an overhanging roofline. Originally constructed as dormitories, Huesman and Sullivan Halls were converted to office space in the 1970s and then re-converted for residential use in 1984, providing housing for both faculty and students. Successive renovations of both buildings continued through 2000.

Neff's reputation rests largely on his use of imaginative interpretations of Spanish Colonial, Mediterranean, and other period revival styles, especially for private residences. He helped establish a regional style of domestic architecture, with many quality examples of his work found throughout Southern California. Important works by Neff include the King Vidor House in Beverly Hills (1928), the Gillette Ranch in Calabasas (1929), the Frederick March Estate in Beverly Hills (1934), and the Doheny Memorial Library in Camarillo (1939). As modest institutional buildings, Huesman and Sullivan Halls are not representative of the type of work Neff's is celebrated for, nor do they feature any technical or design innovations associated with Neff. Visual inspection of both buildings indicates that original doors, windows, and roof material have been replaced. Successive interior conversions appear to have substantially compromised the material integrity as well. For these reasons, Huesman and Sullivan Halls would not qualify as important examples of the work of master architect Wallace Neff.²⁴

4.4.1.3.2 Rosecrans Hall (1962), Seaver Science Hall (1962), Whelan Hall (1965)

Los Angeles architectural firm A.C. Martin and Associates designed seven buildings on campus, three of which were constructed between 1962 and 1965.

Rosecrans Hall and Whelan Hall, two identical buildings constructed in the 1960s and also designed by A.C. Martin and Associates, flank Desmond Hall. Rosecrans and Whelan Halls do not appear to be associated with important persons or events in history nor are they a particularly distinctive example of type, period, design, or method of construction.²⁵

The remaining mid-twentieth century building designed by A.C. Martin and Associates is the Seaver Science Hall. Seaver Science Hall, constructed in 1962, consists of two rectangular volumes connected by a two-level passageway of glassed-in arches. The larger volume rises three stories and features recessed window bays fronted by concrete grillwork. A flat-roofed portico marks the main entrance. The Seaver

²⁴ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 29.

²⁵ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 30.

Science Hall does not appear to be associated with important events in history nor is either building a particularly distinctive example of type or period.²⁶

A.C. Martin and Associates also designed the Fritz Burns Fine Arts Center, constructed in 1983. Only twenty-six years old in 2009, more time would be needed to establish historic significance.²⁷

4.4.1.3.3 Edward T. Foley Center (1962)

The Edward T. Foley Center, constructed in 1962, was designed by New York architect Edward Durrell Stone. Beginning in the 1950s, Stone broke from the constraints of strict Modernist orthodoxy and designed buildings emphasizing expressive forms, ornamentation, and decorative detailing. Due to its departure from Modernism's emphasis on function, his expressive architectural style was subsequently titled "New Formalism." Characteristic features include the extensive use of decorative grillwork facades, colonnades and elaborate fountains and landscaping. While Stone's New Formalism was popular and brought him many high-profile commissions, some critics of the time derided his designs as shallow exercises in surface decoration. However, the recent destruction or alteration of buildings designed by Stone has brought renewed discussion regarding the merits of his work and the preservation of his legacy. Stone's work has been recognized as a distinctive style in the evolution of American architecture and his importance and influence as an architect is now widely accepted.

Constructed in 1962, the Foley Center is not yet 50 years old. While many of its design features are characteristic of Stone's distinctive style, including the perforated overhanging roof, arched colonnade, and decorative, lozenge-shaped wall pattern, these elements are not deployed in the dramatic and expressive manner that characterizes Stone's more celebrated works. The Foley Center is not generally mentioned in the available literature regarding Stone and it appears that the Foley Center is not considered a particularly noteworthy example of Stone's work when compared with Stone-designed buildings for other college and university campuses throughout the United States. In California, more distinguished and representative examples of Stone's designs can be found in the campus plan and buildings of the Harvey Mudd College (1955) and the Claremont School of Theology (1963), both in Claremont; the Stanford University Medical Center in Palo Alto (1955); the Von KleinSmid Center (1965), Waite Phillips Hall (1966) and the Social Sciences Building (1968) at the University of Southern California; and Beckman Auditorium on the California Institute of Technology campus in Pasadena (1963). Local commercial buildings such as the Perpetual Savings and Loan (1963) in Beverly Hills and the partially demolished Stuart Pharmaceutical building (1956) in Pasadena can also be viewed as more representative

²⁶ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 30.

²⁷ Ibid.

examples of Stone's signature style. For these reasons, the Foley Center does not appear to be significant as an important example of the work of Edward Durrell Stone.²⁸

4.4.1.4 Application of Historical Significance Criteria

With the exception of the Sacred Heart Chapel, none of the buildings constructed after 1929 are prime examples of the work of a master architect or embody distinctive characteristics of a type, period, or method of construction. Therefore, these buildings are not eligible for listing in the National Register under Criterion C or in the California Register under Criterion 3, are not eligible for listing as a Los Angeles Historic-Cultural Monument and, consequently, are not considered historically significant.

4.4.1.5 Evaluation of LMU Campus as an Historic District

Although the LMU campus can be understood as a grouping of buildings and sites, no portion of the campus appears to qualify as a historic district due to the campus's discontinuous and fragmented physical development.²⁹ Formation of the campus involved multiple campus plans (Thomas Franklin Power, David Elms Graham, De Massirevich, Prentiss French), none of which were ever fully realized. In addition, the Great Depression and World War II caused major disruptions in the development process, delaying for many years the establishment of a coherent campus pattern. Subsequently, the older portions of the LMU campus display a patchwork of only partially related planning strategies and architectural styles. No grouping or concentration of buildings exists today that is representative of a significant period in LMU's history.

4.4.2 Evaluation of Potential Impacts to Campus Historical Resources

Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face letter "L" are considered historic resources for purposes of CEQA according to Section 15064.5(a)(3). All four resources were determined to be associated with historic events which, in this instance, include the founding of LMU's Westchester campus in 1928 and the establishment of its identity as a Catholic-affiliated educational institution. None of these historic resources would be demolished or relocated under the Proposed Project. Any renovations that would be made to these historic resources would be made in compliance with the Secretary of the Interior's Standards.

All other structures and objects on the campus are not considered historic resources for purposes of CEQA and their removal would not constitute a significant impact. Since no historic resources would be

²⁸ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 31-32.

²⁹ Historic Resources Group, LLC, *Historical Resources Assessment: Loyola-Marymount University*, 32.

demolished or relocated, impacts would be less than significant. However, to ensure that potential impacts continue to be avoided as the Proposed Project is implemented, mitigation measures **MM-HIST-1** and **MM-HIST-2** are required. **MM-HIST-1** requires documentation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel prior to issuance of a construction permit for any work on those buildings, and **MM-HIST-2** requires renovation and rehabilitation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel to conform to the Secretary of the Interior's Standards.

HIST-3 Would impacts related to historic resources be significant based on conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings?

The Proposed Project does not propose to substantially alter, convert, or rehabilitate Xavier Hall, St. Robert's Hall, or Sacred Heart Chapel such that the integrity or significance of the resources would be reduced. Any renovations that would be made to these historic resources would be made in compliance with the Secretary of the Interior's Standards. The Master Plan Project proposes the possible addition of an outdoor columbarium, a place for the respectful storage of cinerary urns, in the form of a memorial wall to be located in the landscaped groves flanking Sacred Heart Chapel to the east or west. However, this addition would not require any physical alteration to the Chapel. If, in the future, it is decided that conversion, rehabilitation, or alteration of any of the historic buildings on campus is required either to maintain safety standards or improve facilities to accommodate the evolving needs of LMU, all construction would be conducted in conformance with the Secretary of the Interior's Standards. Therefore, impacts would be less than significant. To ensure that potential impacts continue to be avoided as the Proposed Project is implemented, mitigation measure **MM-HIST-2** is required. **MM-HIST-2** requires renovation and rehabilitation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel to conform to the Secretary of the Interior's Standards.

HIST-4 Would impacts related to historic resources be significant based on construction that reduces the integrity or significance of important resources on the site or in the vicinity?

While typical groundborne vibration levels from construction activities very rarely reach levels that can damage structures, intensive vibration levels can be generated from pile drivers, large bulldozers, and other equipment used for earth excavation. Pile drivers would not be used as part of the Proposed Project's construction.

As the Proposed Project is intended to be implemented over a 20-year period and the specific siting of all buildings and structures has not yet been determined to ensure that potential impacts due to earth excavation, earth moving activities, and possible settlement due to the removal of adjacent soil are

avoided as the Proposed Project is implemented, mitigation measure **MM-HIST-3** is required. **MM-HIST-3** requires creation of a shoring plan to ensure the protection of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel prior to issuance of a permit for earth excavation or earth moving activities that could impact those buildings.

4.5 Mitigation Measures

No impacts to historic resources are expected to occur under the first three CEQA significance thresholds listed above, however to ensure that potential impacts continue to be avoided, mitigation measures **MM-HIST-1** through **MM-HIST-2** are required. Additionally, to ensure that potential impacts to historic resources during construction are avoided, **MM-HIST-3** is required.

MM-HIST-1 LMU shall prepare documentation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel prior to issuance of a construction permit for any work on those buildings. This documentation shall include:

- A brief written construction history in narrative format for each building,
- A site plan showing the location of each building. This site plan shall include a photo key,
- A sketch floor plan for each building
- Field photographs (35mm) based on Historic American Buildings Survey guidelines. Views shall include contextual views, all exterior elevations, detailed views of significant exterior architectural features, and interior views of significant historical architectural features or spaces (if any), and
- Available historic photographs and historic plans.

MM-HIST-2 Renovation and rehabilitation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel shall conform to the Secretary of the Interior's Standards

MM-HIST-3 Prior to issuance of a permit for earth excavation or earth moving activities that could impact Xavier Hall, St. Robert's Hall, or Sacred Heart Chapel, LMU shall create a shoring plan to ensure the protection of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel.

4.6 Level of Impact After Mitigation

Potential impacts related to implementation of the Proposed Project would be less than significant after mitigation; therefore, no adverse effects to historic resources would result from Project implementation.

4.7 Cumulative Impacts

Impacts upon historic resources tend to be site-specific and are assessed on a site-by-site basis. Where resources in close proximity or with similar valued characteristics would be adversely affected, implementation of cumulative development would represent an incremental adverse impact on historic resources. However, implementation of the Proposed Project would not adversely impact any historic resources on-Campus. The historic resources on LMU's Campus, which include Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face "L," would be retained as part of the Proposed Project, and mitigation measures would be implemented to ensure no impacts to historic resources would occur during construction. Therefore, Project implementation would not result in a cumulatively significant impact on historic resources.