3.4 CULTURAL AND TRIBAL CULTURAL RESOURCES

The Project site does not have known existing archaeological or historical resources. Decades of development and use within the Project site and vicinity has disturbed and filled native soils and redeveloped original buildings from the 1966 Zoo design, substantially reducing the potential for intact cultural resources on site. However, given the Project site setting in an area with known prehistoric occupation and use, there is a low potential for unknown buried archaeological resources to be discovered during Project construction. Based on input received through tribal consultation, there is a potential for tribal cultural resources to be discovered during Project construction as well. With mitigation to monitor construction activities and respond to incidental discovery, the proposed Project would not cause significant impacts to cultural or tribal cultural resources.

This section describes known or anticipated cultural and tribal cultural resources within or near the Project site, assesses the potential impacts to these resources that could result from implementation of the Los Angeles Zoo (Zoo) Vision Plan (Vision Plan), and identifies mitigation measures. Cultural resources are defined as historic-period buildings, structures, districts, and objects, and archeological sites dating from either the prehistoric or historic period. Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, listed in a local register of historic resources, or determined by a local agency. Paleontological resources are addressed in Section 3.7, Geology and Soils.

3.4.1 Environmental Setting

Regulatory Setting

Federal Regulations

National Register of Historic Places (NRHP)

The National Register of Historic Places (NRHP) was established by the National Historic Preservation Act of 1966 (NHPA) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment” (Code of Federal Regulations 36 Section 60.2). The NRHP recognizes both historic-period and prehistoric archaeological properties that are significant at the national, state, and local levels.

To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, site, buildings, structures, and
objects of potential significance must meet one or more of the following four established criteria (U.S. Department of the Interior 1995):

a. Are associated with events that have made a significant contribution to the broad patterns of our history.

b. Are associated with the lives of persons significant in our past.

c. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

d. Have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting the criteria of significance, a property must have integrity. Integrity is defined as “the ability of a property to convey its significance” (U.S. Department of the Interior 1995). The National Register recognizes seven factors that define 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 took place.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- 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.

**State Regulations**

**California Environmental Quality Act**

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state. CEQA requires lead agencies to
determine if a project would have a significant effect on the environment, including significant effects on historical or archaeological resources.

Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA Guidelines (Title 14 CCR Section 15064.4) recognize that an historical resource includes: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR; (2) a resource included in a local register of historical resources, as defined in the California Public Resources Code (PRC) Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is an historical resource, the provisions of CEQA Section 21084.1 and CEQA Guidelines Section 15064.4 apply. If a project may cause a substantial adverse change (defined as 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) in the significance of an historical resource, the lead agency must identify potentially feasible measures to mitigate these effects (CEQA Guidelines Sections 15064.4[b][1], 15064.4[b][4]).

If an archaeological site does not meet the historical resource criteria contained in the CEQA Guidelines, the site may be treated in accordance with the provisions of Section 21083, which is a unique archaeological resource. As defined in CEQA Section 21083.2 a “unique” archaeological resource is an archaeological artifact, object, or site, for which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site is to be treated in accordance with provisions which state that
3.4. Cultural and Tribal Cultural Resources

if the lead agency determines that a project would have a significant effect on unique archaeological resources the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1[a]). If preservation in place is not feasible, mitigation measures shall be required.

CEQA Guidelines note that if an archaeological resource is neither a unique archaeological resource nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CEQA Guidelines Section 15064.4[c][4]).

California Register of Historical Resources (CRHR)

Under PRC Section 5024.19(a), the California Register of Historical Resources (CRHR) was created in 1992 and implemented in 1998 as “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.” Certain properties, including California properties formally determined eligible for, or listed in, the NRHP, are automatically included in the CRHR. Other properties recognized as California Points of Historical Interest, identified as significant in historical resources surveys, or designated as local landmarks may be nominated for inclusion in the CRHR. A resource maybe listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

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

In addition, under California PRC 5024.1, Title 14 California Code of Regulations (CCR), Section 4852(c), a cultural resource must retain integrity to be considered eligible for the CRHR. Specifically, it must retain sufficient character or appearance to be recognizable as a historical resource and convey reasons of significance.

California Historical Landmarks (CHLs)

California Historical Landmarks (CHLs) are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific/technical, religious, experimental, or other value and that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resources also must be approved for designation; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks.
To be eligible for designation as a landmark, a resource must meet at least one of the following criteria:

1. It is the first, last, only, or most significant of its type in the state or within a large geographic region.
2. It is associated with an individual or group having a profound influence on the history of California.
3. It is a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

**California Points of Historical Interest (PHIs)**

California Points of Historical Interest (PHIs) are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific/technical, religious, experimental, or other value. The PHI designation is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance.

To be eligible for designation as a PHI, a resource must meet at least one of the following criteria:

- It is the first, last, only, or most significant of its type within the local geographic region.
- It is associated with an individual or group having a profound influence on the history of the local area.
- It is a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

**California Health and Safety Code**

In the event human remains are encountered, California Health and Safety Code Section 7050.5 requires that the coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the Native American Heritage Commission (NAHC) within 24 hours.

**California Public Resources Code**

PRC Section 5097.98 provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities consider the possibility of multiple burials. PRC Section 5097.8 further requires the NAHC, upon notification by a coroner, designate and notify a Most Likely
Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

**Assembly Bill 52 (AB52)**

Assembly Bill 52 (AB52) specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. AB52 requires that a lead agency consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a project.

**Senate Bill 18 (SB18)**

Passed in 2004, Senate Bill 18 (SB18) requires cities and counties to consult with Native American tribes to help protect traditional tribal cultural places as part of a general plan adoption or amendment. Unlike AB52, SB18 is not an amendment to, or otherwise associated with, CEQA. Instead, SB18 requires that, prior to the adoption or amendment of a city or county’s general plan, the city or county must conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects that are located within the city or county’s jurisdiction. Under SB18, cities and counties must notify the appropriate Native American tribe(s) of intended adoption or amendments to general plans and offer the opportunity for the tribe(s) to consult regarding traditional tribal cultural places within the proposed plan area. A Native American tribe is defined as “a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the Native American Heritage Commission” (Governor’s Office of Planning and Research 2005:6). Traditional tribal cultural places are defined in PRC Sections 5097.9 and 5097.993 to include sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines, or any historic, cultural, or sacred site that is listed on or eligible for the CRHR including any historic or prehistoric ruins, burial grounds, or archaeological site (Governor’s Office of Planning and Research 2005:4).

**Local Regulations**

**City of Los Angeles General Plan**

The City of Los Angeles General Plan Conservation Element, adopted in 2001, states as its objectives to “protect the city’s archaeological and paleontological resources for historical, cultural, research and/or educational purposes” by continuing “to identify and protect significant archaeological and paleontological resources known to exist or that are identified during land development, demolition, or property modification activities.”
In addition, the City protects historic and cultural sites and/or resources potentially effected by proposed land development, demolition, or property modification activities. The City’s environmental guidelines require archeological monitoring of excavations or other subsurface activities associated with a development project in which all or a portion is deemed to be of archaeological significance. Discovery of archaeological materials may temporarily halt the project until the site has been assessed, potential impacts evaluated, and, if deemed appropriate, the resources protected, documented and/or removed (City of Los Angeles 2001).

City Cultural Resource Designations
In additional to the NRHP and the CRHR, three additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument
2. Designation by the Community Redevelopment Agency as being of cultural or historical significance within a designated redevelopment area
3. Classification by the City Council as a Historic Preservation Overlay Zone

The City of Los Angeles Cultural Heritage Ordinance states that a Historic-Cultural Monument (HCM) designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature (City of Los Angeles, Department of City Planning 2009). An historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites:

- in which the broad cultural, political, 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 mains 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
- which are notable works of a master builder, designer, or architect whose individual genius influenced his or her age.

Griffith Park is City of Los Angeles HCM #942, CHC No: CHC-2008-2724-HCM, CF No: 08-3086, adopted on January 27, 2009. While the Project site is located within Griffith Park, the Zoo is excluded from this designation and, therefore, does not contribute to the cultural resource value of Griffith Park.
Los Angeles Historic-Cultural Monuments

The City of Los Angeles Cultural Heritage Ordinance, enacted in 1962 and amended in 2018, allows for the designation of buildings and sites as individual local landmarks in the City of Los Angeles, known as Historic-Cultural Monuments (HCMs).

Section 22.171.7 of Article 1, Chapter 9, Division 22 of the City of Los Angeles Administrative Code defines a Historic-Cultural Monument as “any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles.” A proposed Monument may be designated by the City Council upon the recommendation of the Cultural Heritage Commission if it meets at least one of the following criteria:

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Designation as a Historic-Cultural Monument is “reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature.” For integrity purposes, a resource eligible for local designation should retain enough of its historic character or appearance to convey the reason(s) for its significance.

Historic Districts

Standard preservation practice evaluates collections of buildings, structures or other features from similar time periods and historic contexts as historic districts. The National Park Service 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.” A historic district derives its significance as a single unified entity.

According to the National Park Service, “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.” Examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas, and rural villages.
Resources that have been found to contribute to the historic identity of a district are referred to as district contributors. Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

**Existing Conditions**

**Regional Setting**

**Prehistoric Setting**

The first occupants of southern California arrived as early as 12,000 BP during the Early Man or Paleocoastal period (10,000-6,000 BC / 11,950-7,950 BP). The first evidence of human occupation in the Los Angeles area dates to approximately 9,000 BP. Evidence of maritime adaptation including the use of shellfish, fish, and marine mammals has been found at coastal archaeological sites. During the Milling Stone or Early Period (6,000 – 3,000 BC / 7,950 – 4,950 BP), permanent settlements were primarily located on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of food resources including seeds, fish, shellfish, small mammals, and birds were exploited. Larger archaeological sites with a greater diversity of artifacts appear at the end of the Milling Stone Period but they seem to have been occupied seasonally. Aspects of the Milling Stone Period persisted into the Intermediate Period (3,000 BC – AD 500 / 4,950 – 1,450 BP), but the Intermediate period witnessed extensive population growth in Southern California and sedentary lifestyle in established camps. Evidence suggests these camps were located on the margins of rivers, marshes, and swamps within the Los Angeles River drainage. Major settlements continued to be occupied seasonally. Burials continued to be common in this period and cremations were not. During the Late Prehistoric or Late Period (AD 500 – 1542 / 1,450 – 408 BP), fully-developed villages with complex layouts and burial grounds exhibiting a variety of mortuary practices appear. This period also marks more formal placement and differentiation of burials than seen previously.

The Project area falls within the traditional ethnographic territory of the Takic-speaking Gabrieleño/Tongva who established residential communities of 50 to 150 people throughout a territory that included the Los Angeles Basin south to parts of Orange County and north to Topanga Canyon, and the southern Channel Islands (Santa Catalina, San Clemente, and San Nicolas) (Gumprecht 1999). The villages closest to the proposed Project site were Kaweenga, located about 3.5 miles to the west at Universal Studios Hollywood theme park, and
Haahamonga, most likely located about 3 miles to the northeast, between Griffith Park and the Verdugo Hills (McCawley 1996). Mococahuenga (Fern Dell), about 2 miles southwest of the proposed Project site in Griffith Park, was reportedly once a meeting ground and/or village for the Gabrieleño/Tongva (Cohen 1985). The Gabrieleño/Tongva population prior to Spanish contact has been estimated at approximately 5,000 (Kroeber 1925). For additional details about the Project’s prehistorical setting, please see Appendix F.

Tribal Cultural Resources & AB 52 Consultation

The National Park Service (NPS) defines a cultural landscape as a “geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values” (Birnbaum 1994). There are four types of cultural landscape that are not mutually exclusive:

- historic sites (a landscape significant for its association with a historic event, activity, or person),
- historic designed landscapes (a landscape that was consciously designed or laid out by a landscape architect, master gardener architect, engineer, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition such as parks, campuses, or estates),
- historic vernacular landscapes (a landscape that evolved through use by the people whose activities or occupancy shaped it such as rural historic districts or agricultural landscapes), and
- ethnographic landscapes (a landscape containing a variety of natural and cultural resources that associated people define as heritage resources such as contemporary settlements, sacred religious sites, and massive geological structures).

When a lead agency chooses to treat a resource as a tribal cultural resource, that determination will be supported with substantial evidence. Evidence that may support such a finding could include, among other evidence, elder testimony, oral history, tribal government archival information, testimony of a qualified archaeologist certified by the relevant tribe, testimony of an expert certified by the Tribal Government, official tribal government declarations or resolutions, formal statements from a certified Tribal Historic Preservation Officer, and historical notes (OPR 2017).

A cultural landscape that meets these criteria is a tribal cultural resource, to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria (ESA PCR 2017).

For this Project, a Native American Heritage Commission (NAHC) AB 52 Consultation Tribal Contact List and Sacred Lands File Search was requested on December 4, 2018, and
conducted on December 19, 2018 (Katy Sanchez, NAHC Associate Environmental Planner). The NAHC identified six Native American contacts:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians-Kizh Nation
- Anthony Morales, Chairperson, Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Sandonne Goad, Chairperson, Gabrieleño/Tongva Nation
- Robert F. Dorame, Chairman, Gabrieleño/Tongva Indians of California Tribal Council
- Linda Candelaria, Chairperson, Gabrieleño/Tongva Tribe
- Charles Alvarez, Councilmember, Gabrieleño/Tongva Tribe

Letters indicating that a formal decision to undertake the proposed Project had been made and identifying the opportunity to consult pursuant to Public Resources Code § 21089.3.1 were sent to these Native American contacts on or around January 10, 2019 (Appendix F). One response, from the Gabrieleño Band of Mission Indians-Kizh Nation, was received. The response, dated January 17, 2019, indicated that the Gabrieleño Band of Mission Indians-Kizh Nation desired to consult with the City on the proposed Project (Appendix F).

A conference call to discuss the proposed Project and Tribal Cultural Resources was held on February 5, 2019 (Appendix B). Participants included:

- Andrew Salas, Gabrieleño Band of Mission Indians-Kizh Nation, Chairman
- Matthew Teutimez, Gabrieleño Band of Mission Indians-Kizh Nation, Environmental Director
- Amanda Amaral, City of Los Angeles, Bureau of Engineering
- Darryl Pon, Los Angeles Zoo, Planning and Development Director
- Julia Pujo, Wood, Deputy Project Manager
- Ken Victorino, Wood, Senior Archaeologist

Mr. Salas indicated that the proposed Project site had significant cultural value. Mr. Salas indicated the area is considered a cultural landscape because:

- the Gabrieleño/Tongva have occupied the Los Angeles Basin for thousands of years;
- the village of Cahuenga is located west of Griffith Park;
- the rancheria of Maugna is located in the vicinity of Griffith Park; and
- sacred natural springs utilized for medicinal purposes are located in the general region.
3.4. Cultural and Tribal Cultural Resources

The cultural landscape defined by Mr. Salas would be an ethnographic landscape as defined by the NPS.

The Gabrieleño Band of Mission Indians-Kizh Nation submitted a series of historical maps and “mitigation language approved by our Tribal Government for use with this project” via email on February 7, 2019 (Appendix B). The mitigation measures recommended by the Gabrieleño Band of Mission Indians-Kizh Nation included:

- retain a Native American monitor/consultant,
- unanticipated discovery of tribal cultural and archaeological resources,
- discovery of unique archaeological resources,
- unanticipated discovery of human remains and associated funerary objects,
- resources assessment and continuation of work protocol,
- Kizh-Gabrieleño procedures for burials and funerary remains,
- treatment measures, and
- professional standards.

The Gabrieleño Band of Mission Indians-Kizh Nation consider that “human remains” represent more than human bones. Gabrieleño Band of Mission Indians-Kizh Nation traditions included, but were not limited to, the burial of funerary objects with the deceased and the ceremonial burning of human remains. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with the individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered an associated funerary object.

**Historical Setting**

The Project site now occupied by the Zoo was historically part of Rancho Los Feliz established in 1795 after Spanish Corporal, José Vicente Feliz, was gifted the property from the Spanish crown. This property stretched from the Cahuenga Pass on the west, to the Los Angeles River on the east and north, and well into the flatlands on the south, encompassing the present-day community of Los Feliz and what is now Griffith Park. As Rancho Los Feliz, the land was used to graze cattle. Following the Mexican-American War and the secession of California to the United States, a claim for Rancho Los Feliz was filed with the Public Land Commission in 1852. In 1871, the grant was finally patented to Maria Ygnacia Verdugo de Feliz.
Property ownership was transferred to Colonel Griffith Jenkins Griffith in 1882. Griffith used his acquired land to support pigs, cows, horses, and sheep. He also grew corn and hunted for jack rabbits and wildcats on the property. During the 1880s, Griffith opened a short-lived ostrich farm on the site where the Griffith Park merry-go-round would eventually be located. Griffith Park was created in 1896, when Colonel Griffith J. Griffith donated 3,015 acres of his land which included portions of the former Rancho Los Feliz, to the City of Los Angeles. However, the flatlands to the east between the hillsides and the Los Angeles River were outside the original park boundaries. These flatlands were part of a 351-acre plot of land known as Griffith Reservation, which was still owned by Colonel Griffith and remained undeveloped until 1911 when Griffith’s son Van, created an airfield on the site; the airfield was abandoned in 1916. In 1921, Van Griffith transferred ownership of the remaining flatlands to the City, which expanded Griffith Park. Under the City’s ownership, the airfield was leased for use by the 115th Observation Squadron, 40th Division Air Service of the California National Guard. The airfield reopened as the Griffith Park Airfield on January 25th, 1925 and was permanently closed in 1941. Today, there is no known physical evidence of aviation in Griffith Park on the site.

In 1957, the Golden State (I-5) Freeway was completed through the flatlands along the park’s eastern edge. This was followed in the early 1960s with the construction of the Ventura (SR-134) Freeway along the northern edge of the park. Together, these two projects completely cut Griffith Park off from the river. It was also in 1957 that Los Angeles voters overwhelming passed a bond measure to fund a new zoo.

In 1994, a City Department of Recreation and Parks (RAP) Primary Record and District Record found Griffith Park as a significant resource under National Register Criteria. This same form assigned Griffith Park a California Historical Resource Status Code of 2S2 (“Individual property determined eligible for the National Register) with a period of significance defined as 1896-1944. Griffith Park is listed in the California Historical Resources Inventory (HRI) with a status code of S2S. In 2009, Griffith Park was locally designated as Los Angeles Historic-Cultural Monument No. 942 with 1896-1957 defined as the period of significance. For additional details about the Project’s historical setting, please see Appendix G.
History of Regional Zoos

The City’s first zoo was the city-owned Eastlake Zoo, opened at 1885 in East Los Angeles Park (later renamed Lincoln Park) and closed in 1912. Also, in 1912, the Griffith Park Zoo was established in Griffith Park. Situated less than two miles south of the Zoo’s current location, the Griffith Park Zoo was created on the site of the former Griffith & Sketchley Ostrich Farm. The zoo started small, with just a few pens and cages and an assortment of animals, including all fifteen the animals transferred from the Eastlake Zoo. The Griffith Park Zoo would remain open until August 1966 when its animals could be transferred to the new facility. Today, extant remnants of the “Old Zoo”—including faux-stone caves and metal cages—make for a popular picnicking spot within the park.

In 1915, the Selig Zoo, later named Zoopark, opened at 3800 N. Mission Road in East Los Angeles Park and replaced the Eastlake Zoo in the City. Following financial difficulty, Zoopark closed in 1940. However, concrete animal sculptures decorating the main entrance of Zoopark remained until the 1960’s until they were removed and placed in storage. In 2000, they were rediscovered and ten were eventually restored. In 2009, seven of these sculptures were installed at the Los Angeles Zoo. In 1957, the same year the I-5 was completed through the flatlands along the park’s eastern edge, Los Angeles voters overwhelming passed a bond measure to fund a new zoo. The northeastern end of Griffith Park was selected and approved as the location for Los Angeles’ new zoo in 1962. For additional details about the Project’s historical setting, please see Appendix G.

Concrete statues decorating Zoopark were abandoned before being rediscovered and installed at the Los Angeles Zoo in 2009. Photo Source: Los Angeles Herald Examiner Photograph Collection, LAPL.

Project Site and Vicinity

Archaeological Setting

Topography of the Project site is undulating with approximately 150 feet of elevation change. Many areas of the Zoo comprise steep slopes over 20 percent, particularly in the California and Africa planning areas. Interior portions of the Zoo are relatively flat resulting from the natural topography and previous development involving heavy ground disturbance and imported fill to level out the Zoo site for development. The Zoo’s interior was constructed from artificial, uncompacted fill, including exhibit topography and visitor walkways. Visitor walkways within the Zoo have been cut between 6 feet and approximately 15 feet below the
original and constructed topographic surfaces. Subsurface utilities including electrical lines, sewer laterals, and water pipes have also been excavated and installed throughout the Zoo.

Both the Zoo Entry planning area and Nature Play planning area span across relatively level topography and have been fully developed. Likewise, the Asia and Rainforest planning areas have previously been developed and experienced extensive ground disturbances. The proposed California and Africa planning areas in the northeastern and southwestern portions of the Zoo, respectively, are undeveloped and generally consist of steep slopes greater than 20 percent.

Previous investigations concluded that steep slopes exceeding 20 percent within the Zoo have a low potential for the presence of prehistoric occupation. Granite bedrock below the ground surface exists in California and Africa planning areas and neither area contains bedrock outcrops that may have been used as temporary shelters. More level areas with greater potential have been substantially disturbed by grading and development over the last century.

**Historic Setting**

In 1962, a new site for a City zoo was selected in Griffith Park. That same year, the RAP Commission hired the architectural firm Charles Luckman Associates to develop a preliminary zoo master plan. Construction began in 1964 and the Los Angeles Zoo opened on November 28th, 1966. Upon opening, it was widely acknowledged that it was not the world-class zoo that had been promised to voters when they first approved the funding in 1957. For example, the original design did not include an efficient circulation system with accessibility for visitors of all ages and abilities and did not create an immersive visitor experience (refer to Section 2.3.2, *Project Objectives*). The Zoo’s Theme Building, modernly referred to as the Treetop Terrace, was of greatest architectural value. Treetops Terrace featured two hexagonal spires standing at 105 feet in height, constructed of 160,000 board feet of lumber and 496 windows, all supported by 12 massive, laminated beams, and painted gold. Treetops Terrace was the only building designed by Luckman that made a strong architectural statement. Sited on a small rise, Treetops Terrace was the centerpiece of Luckman’s plan with its twin hexagonal spires visible throughout the Zoo. The main entrance was also of notable architectural value. Luckman’s main entrance was Modern in its style, consisting of a reflecting pool with lily pads and an outcropping of
boulders; wide, low entrance steps; a canted white stucco wall with “Los Angeles Zoo” in simple, affixed metal lettering; and a series of flag poles.

At the time of opening, the Zoo spanned 110 acres. Luckman intentionally left room for future expansions, predicting that the Zoo would one day occupy nearly twice as many acres. As currently developed, the Zoo occupies 133 acres and contains structures dating as early as 1966 and as recent as 2015. Redevelopments began as early as the 1970s when the Zoo upgraded several exhibits and added new ones. In the early to mid-1980s, the Zoo constructed the Australia House and the China Pavilion and demolished the Children’s Zoo and replaced it with a new exhibit displaying the animals of the American Southwest. Modifications accelerated in the 1990s and 2000s. The Zoo’s 1992 master plan, as updated in 1998, led to an impressive series of improvements over the succeeding 17 years, which resulted in comprehensive redesign and redevelopment of the Zoo. Even the architecturally notable main entrance underwent several redesigns. For example, the original 1966 entrance featured reflecting pools with lily pads under a concrete Los Angeles Zoo sign with large multicolor flags. This entrance was demolished and replaced sometime between 1985 and 1987 with a yellow arc entrance. The current Zoo entrance was constructed in 2005. These “recently-completed projects” (1998 and later) include Chimpanzees of the Mahale Mountains (1998); Red Ape Rainforest (2000); Francois’ Langur (previously Golden Monkey) exhibit (2008); Winnick Family Children’s Zoo (2001); Gottlieb Animal Health and Conservation Center (2002); Entry Plaza (2005); Sea Life Cliffs (2005); Children’s Discovery Center (2005); California Condor Rescue Zone (2005); Campo Gorilla Reserve (2007); Elephants of Asia (2010); parking lot (2010); Tom Mankiewicz Conservation Carousel (2011); L.A.I.R. (2012); Angela Collier World of Birds Theater (2013); Rainforest of the Americas (2014); and the Jaguar Exhibit (2015). See Table 3.4-1.

During such redevelopment periods, major changes were made to the original Zoo facility, including alterations to circulation plans, regrading, and the loss of original buildings or structures. Approximately one third of visitor-serving areas (e.g. exhibits, circulation paths, support services) have been completely redeveloped since 1998. As such, the current setting of the Zoo consists of a mixture of animal exhibits, visitor-related amenities, and service facilities dating from the mid-1960s to the present, creating an inconsistent visual and historical character.
### Table 3.4-1. Existing Features within the Zoo

<table>
<thead>
<tr>
<th>Feature</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration Building</td>
<td>One-story building containing administrative offices for the Los Angeles Zoo and GLAZA.</td>
<td>1966* (expanded c. 1975; GLAZA addition c. 1990)</td>
</tr>
<tr>
<td>Angela Collier World of Birds Theater</td>
<td>Two-story theater venue presenting a showcase of avian behavior.</td>
<td>2013</td>
</tr>
<tr>
<td>Australia House (Ahmanson Koala House)</td>
<td>One of the first nocturnal exhibits with a reverse light cycle (dark during the day) so visitors could view the creatures during their active time.</td>
<td>1981 (renovated in 1995)</td>
</tr>
<tr>
<td>Botanical Gardens</td>
<td>Gardens and groves throughout the Zoo site with more than 7,000 individual plants representing over 800 different species; the Zoo also serves as a repository for exotic or rare plants, one of 62 Plant Rescue Centers in the nation. The City Council changed the Zoo’s name to include Botanical Gardens in 2003; however, the Zoo is not an accredited member of the American Alliance of Museums and therefore is not an accredited botanical garden.</td>
<td>1966*</td>
</tr>
<tr>
<td>California Condor Rescue Zone</td>
<td>Educational interactive play space for children located in the Children’s Discovery Center near the Entry Plaza.</td>
<td>2005</td>
</tr>
<tr>
<td>Campo Gorilla Reserve</td>
<td>Open-air environment with trees, brush, flowers, grassy areas, climbing rocks, waterfalls, and a shady retreat for two groups of western lowland gorillas.</td>
<td>2007</td>
</tr>
<tr>
<td>Children’s Discovery Center</td>
<td>Two-story facility adjacent to the Entry Plaza; includes classrooms, an auditorium, and education and volunteer offices.</td>
<td>2005</td>
</tr>
<tr>
<td>Chimpanzees of the Mahale Mountains</td>
<td>Exhibit with boulders, palms trees, an artificial termite mound, waterfall, and a tall rock ledge, which is home to one of the largest troops of chimpanzees in the United States.</td>
<td>1998</td>
</tr>
<tr>
<td>Circulation Plan</td>
<td>Interior circulation system of internal pathways and roadways used by both visitors and Zoo staff, accommodating pedestrians, trams, and service vehicles.</td>
<td>1966* (with modifications from 2002 to 2016)</td>
</tr>
<tr>
<td>Commissary Building</td>
<td>The hay barn and grain storage are part of the original service building complex (including the Hospital and Maintenance buildings) designed by Charles Luckman Associates. The main Commissary was rebuilt as part of the Gottlieb Animal Health and Conservation Center.</td>
<td>1966* (main Commissary rebuilt in 2002)</td>
</tr>
<tr>
<td>Elephants of Asia</td>
<td>Sprawling open-air exhibit including the Wasserman Family Thai Pavilion and four separate and connected yards which provide habitat space for four Asian elephants.</td>
<td>2010</td>
</tr>
<tr>
<td>Entry Plaza</td>
<td>Complex including the main gate, ticketing and guest relations, restaurants, retails shops, and the monumental Zoo marquee</td>
<td>2005</td>
</tr>
</tbody>
</table>
### Table 3.4-1. Existing Features within the Zoo (Continued)

<table>
<thead>
<tr>
<th>Feature</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Francois’ Langur exhibit</td>
<td>Animal exhibit built for Francois’ Langur, previously referred to as the Golden Monkey exhibit. The exhibit features an elevated patron viewing platform and artificial trees for the langurs.</td>
<td>2008</td>
</tr>
<tr>
<td>Gottlieb Animal Health and Conservation Center</td>
<td>Building complex, including animal medical treatment rooms, clinical laboratories, and an animal commissary.</td>
<td>2002 (renamed in 2006)</td>
</tr>
<tr>
<td>Hexagonal buildings/structures</td>
<td>Hexagonal-roofed buildings and structures which are repeated throughout the Zoo site and accommodate a variety of uses (information, vending, refreshments, restrooms, mechanical equipment, picnic tables, open shade structure).</td>
<td>1966*</td>
</tr>
<tr>
<td>Hospital Building</td>
<td>Part of the original service building complex (including the Commissary and Maintenance buildings) designed by Charles Luckman Associates. This building was repurposed for holding reptiles and condors and animal care.</td>
<td>1966*</td>
</tr>
<tr>
<td>Jaguar Exhibit</td>
<td>This exhibit was constructed as an addition to Rainforest of the Americas.</td>
<td>2015</td>
</tr>
<tr>
<td>L.A.I.R.</td>
<td>Two large buildings containing 49 exhibits of over 60 different species of amphibians, invertebrates, and reptiles from around the world.</td>
<td>2012</td>
</tr>
<tr>
<td>Maintenance Building</td>
<td>Part of the original service building complex (including the Hospital and Commissary buildings) designed by Charles Luckman Associates.</td>
<td>1966*</td>
</tr>
<tr>
<td>Parking Lot</td>
<td>Main parking area just east of the Zoo campus—composed of a north lot and south lot divided by Crystal Springs Drive Western Heritage Way—containing 2,345 spaces for Zoo visitors and staff.</td>
<td>1966* (renovated 2010)</td>
</tr>
<tr>
<td>Pit-and-Moat Exhibits</td>
<td>Amoeba-shaped pit with an animal display area surrounded by an open moat; used for larger animals.</td>
<td>1966*</td>
</tr>
<tr>
<td>Rainforest of the Americas</td>
<td>Immersive exhibit with a variety of tropical habitats—from forest treetops to the rivers—for a diverse mix of rainforest-dwelling species.</td>
<td>2014</td>
</tr>
<tr>
<td>Red Ape Rainforest</td>
<td>Orangutan exhibit with a large climbing platform and a behind-the-scenes living complex with an open-air group room and six heated night rooms.</td>
<td>2000 (renovated in 2015)</td>
</tr>
<tr>
<td>Roundhouse Exhibits</td>
<td>Central hexagonal space with a wood-slat roof surrounded by a circular cage of chain-link fencing, typically containing 2-3 exhibits plus support spaces; used for smaller animals.</td>
<td>1966*</td>
</tr>
<tr>
<td>Selig Zoo Sculptures</td>
<td>Four concrete lion sculptures that were restored and installed in 2009; remnants of the 1915 Selig Zoo which originally displayed fifteen elephant and lion sculptures by Italian sculptor Carlo Romanelli at its main entrance. The remaining sculptures are currently in storage. Several of the sculptures were not fully restored and one sculpture was never found.</td>
<td>1915 (installed in current Zoo 2009)</td>
</tr>
</tbody>
</table>
### Table 3.4-1. Existing Features within the Zoo (Continued)

<table>
<thead>
<tr>
<th>Feature</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sea Life Cliffs</td>
<td>Aquatic habitat with a replicated rocky cove, beach area, and saltwater pools with above- and below-water views of harbor seals and sea lions.</td>
<td>2005</td>
</tr>
<tr>
<td>Tom Mankiewicz Conservation Carousel</td>
<td>Carousel featuring 66 hand-carved and hand-painted wooden animals, many of which represent endangered species; named for the Hollywood screenwriter and former GLAZA chairman.</td>
<td>2011</td>
</tr>
<tr>
<td>Treetops Terrace</td>
<td>The Zoo’s theme building designed by Charles Luckman Associates; its twin spires originally served as a beacon and wayfinding feature visible throughout the Zoo. Its spires have since been removed, and its roof canopy cut back on the east side to accommodate the adjacent carousel.</td>
<td>1966*</td>
</tr>
<tr>
<td>Winnick Family Children’s Zoo</td>
<td>Features a petting zoo stocked with domesticated animals, as well as an outdoor amphitheater and indoor interactive learning center.</td>
<td>2001</td>
</tr>
<tr>
<td>World Aviary</td>
<td>70,000-square-foot aviary opened with the original Zoo in 1966; it is one of the largest and most immersive aviaries in the world, incorporating multiple waterfalls, pools, and other water features to showcase various species of birds from around the world.</td>
<td>1966*</td>
</tr>
</tbody>
</table>

Notes: This list is not comprehensive but is intended to provide a sense of the range and diversity of the Zoo’s existing features.

* These features date from the original 1966 plan, designed by Charles Luckman Associates.

### Historic Resource Assessment

In 1994, Griffith Park was recorded as “significant under National Register Criterion A”. A period of significance for the park was defined as 1896-1944. Griffith Park as a whole was assigned a California Historical Resource Status Code of 2S2 (“Individual property determined eligible for the National Register by the Keeper; listed in the California Register”). The Los Angeles Zoo is identified as a non-contributing feature of Griffith Park, having opened in 1966. A specific rationale for this evaluation is not provided. However, presumably the Los Angeles Zoo was not considered a contributing feature because it falls outside the period of significance for Griffith Park. While Griffith Park is a City historic resource, the Los Angeles Zoo is listed with a status code of 6Y (“Determined ineligible for National Register by consensus through the Section 106 process; not evaluated for California Register or local listing”). Similarly, when Griffith Park was locally designated as Los Angeles Historic-Cultural Monument with a period of significance for Griffith Park as 1896-1957, the Los Angeles Zoo was identified as “later-era” feature dating from 1966. The accompanying Historic Resources Map lists the Los Angeles Zoo as one of several “non-contributing or altered components.”

Pursuant to this analysis, a historic assessment was conducted to evaluate the buildings, structures, and other features of the Zoo for potential historic listing or designation at the federal, state, or local levels (Appendix G). The Zoo was determined ineligible for listing or
3.4. Cultural and Tribal Cultural Resources

designation at the federal, state, or local levels as a historic district. The historic resource assessment also considered individual resources for historic merit. Based upon an understanding of the Zoo’s original design and development by Charles Luckman Associates from 1964 to 1966, the only extant Zoo feature that could rise to the level of significance on its own and therefore be eligible for historic listing or designation as an individual resource is the Theme Building, now known as Treetops Terrace. However, the structure has since substantially altered such that it no longer reflects its original appearance and is not considered eligible for designation as a historical resource as defined by CEQA. Therefore, the Zoo is not a historic resource either individually or as a district, nor does it contribute to the historic resource value of Griffith Park. For additional details about the Zoo’s historic resource value, please see Appendix G.

3.4.2 Impact Assessment Methodology

Significance Thresholds

According to Appendix G of the CEQA Guidelines, a project would have a significant impact related to cultural resources if it would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
c. Disturb any human remains, including those interred outside of formal cemeteries?

Further, a project would have a significant impact to tribal cultural resources if it would cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC section 5020.1(k)?
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

In addition, the 2006 L.A. CEQA Thresholds Guide goes further to state that a project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:
• Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;

• Can provide information which both of demonstrable public interest is and useful in addressing scientifically consequential and reasonable archaeological research questions;

• Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;

• Is at least 100 years old and possesses substantial stratigraphic integrity; or

• Involves important research questions that historical research has shown can be answered only with archaeological methods.

**Methodology**

The impact analysis for archaeological and tribal cultural resources is based upon the *Draft Cultural & Tribal Cultural Resources Report* prepared by Wood in 2019 (Appendix F). This report included review of past literature and studies of the Zoo property or surrounding areas, a cultural records search conducted at the South Central Coast Information Center for the California Historical Resources Information System (CHRIS), and consultation with tribal representatives in accordance with AB52. In addition, Wood archaeological staff conducted an intensive, pedestrian ground surface survey of Project planning areas where near-term improvements are proposed on July 30th, 2019. AB 52 consultation was conducted by the City, as summarized above and in Appendix F. The results of the *Draft Cultural & Tribal Cultural Resources Report* serve as the basis for the EIR analysis of cultural and tribal cultural resources.

The impact analysis for historical resources is based upon the *Draft Historical Resources Technical Report*, prepared by Historic Resources Group in 2019 (Appendix G). This report includes research and review of historical maps, plans, aerials, building permits, and literature pertaining to the Zoo. In addition, qualified Historic Resources Group staff conducted field inspections on July 30th, 2019 and August 27th, 2019 to examine and document the existing conditions of the Project site. The results of the *Draft Historical Resources Technical Report* serve as the basis for the EIR analysis of historic resources.

**3.4.3 Environmental Impacts Analysis**

*CUL-1:* Would the project Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

The Project would involve phased redevelopment of the majority of the Zoo, which would demolish existing structures, reconfigure internal circulation patterns, remove vegetation, and construct modern buildings, exhibits, and animal enclosures. Over time, older structures would be replaced with improved buildings, signage, and infrastructure. During near-term
phases, the proposed Project would involve demolition of some structures dating from the 1960's, including the World Aviary exhibit. Few of the original 1966 buildings remain intact and unaltered on the site; examples include the maintenance, hospital, and commissary buildings in the Zoo’s service area. Most redevelopment would involve the demolition of structures dating from 1990s to the 2000s, constructed as implementation of the Zoo’s 1992 and 1998 master plans. Treetops Terrace, the most architecturally significant structure from the Zoo’s original construction, is highly altered, missing its iconic gold-painted spires.

The Zoo is listed the NRHP or the CRHR, either as a district or as individual resources within the Zoo. The Zoo is also not locally designated as a historic resource. Although Griffith Park is listed on the CRHR and has been identified as a designated Los Angeles Historical-Cultural monument, the Zoo was determined to be a non-contributing component. Further, the Los Angeles Zoo was opened in 1966, past the significance period defined in Griffith Park’s original DPR Primary Record and District Record (1896-1944) and the significance period defined in Griffith Park’s Los Angeles Historic-Cultural Monument application (1896-1957), indicating the Zoo does not represent the same historical merit as Griffith Park.

To assess potential impacts to historic resources within the Zoo, a new historical resources assessment was conducted to re-evaluate the Zoo for potential historic significance (Appendix G). The analysis considered both potential individually eligible resources and the cumulative value of the Zoo as a historic district. The analysis concluded the Zoo is not eligible for historic listing or designation at federal, state, or local levels. Additionally, no buildings, structures, or other features of the Zoo were found individually eligible for historic listing or designation.

The Zoo is not the city’s first zoo, nor was it even the first zoo in Griffith Park. Rather, it is the third zoo to be owned and operated by the City, and the fourth zoo to operate in the city. The Zoo also does not appear to have been the site of a specific event marking an important moment in Los Angeles history, nor did it make a significant contribution to the development of the City or the surrounding region. Thus, this property is not known to have had a significant association with an important event or trend in local, state, or national history.

The Project site does not appear to have any particular association with an individual that rose to prominence in their profession or group or made significant contributions to their respective field during the period when they were associated with the property. Originally completed in 1966, the Zoo was designed and master planned by noted Los Angeles architectural firm Charles Luckman Associates. Charles Luckman had a successful and prolific career both in partnership with William Pereira, as well as head of his own practice, and may be considered a master architect, but his contributions are common throughout the Los Angeles area. As an institutional property developed by a public agency, the Zoo is not associated with specific residents, occupants, tenants, or developers. Thus, this property is not known to have had a significant association with an important person in local, state, or national history. Further, the Zoo has been incrementally transformed by a succession of improvement projects—including substantial new construction and alteration and removal of
original features—such that it no longer retains its original appearance. As currently
developed, the Zoo is a collection of disparate features which do not represent any particular
design or period. Specifically, it no longer represents mid-20th century zoological design or
the original vision of noted architectural firm Charles Luckman Associates.

Because of ongoing expansion of its animal and plant collections, the Zoo’s physical campus
began experiencing alterations and modifications almost from the start. As early as the 1970s,
the Zoo upgraded several exhibits and added a few new ones. Such modifications to the Zoo’s
physical campus accelerated into the 1990s and 2000s. Improvement projects involved
alterations to the original circulation plan; regrading; tree removal or other landscaping
changes; and/or the loss of original exhibits, buildings, or structures. Focusing only on those
projects which are situated in the visitor-serving or “front-of-house” areas of the Zoo,¹ these
recently-completed projects have resulted in the wholesale redevelopment of some 19.8 acres
of the 55 acres of the Zoo campus devoted to visitor-serving uses, or approximately 36
percent. That is, approximately one-third of the Zoo campus experienced by visitors has been
completely remade since 1998. This does not include earlier redevelopment projects such as
the replacement of the original Children’s Zoo in the 1980s.

For the Zoo campus to be historically meaningful, it would need to retain a preponderance
of original features such that the visitor experience today would be substantially similar to the
visitor experience of 1966. However, the original visitor experience as designed by Luckman
effectively no longer exists. While many 1966 buildings and structures remain—notably the
roundhouse exhibits and the hexagonal buildings and structures—they are often interrupted
by later infill development that wholly deviates from Luckman’s original design intent. The
Zoo has been transformed not only by new construction, but also by the alteration and
removal of original features. In particular, the Zoo no longer retains the two strongest
architectural statements made by Luckman in his original design: the main entrance and the
Theme Building/Treetops Terrace. The original entrance with the reflection pools and
international flags was demolished c. 1987 and replaced with an entrance with yellow and
green arcs and red Los Angeles Zoo letters across the central arc. This main entrance was
demolished in 2005 and replaced with the existing Entry Plaza, including a contemporary-
looking entrance gate and marquee. Treetops Terrace originally featured twin 105-foot
hexagonal spires that served as a beacon and wayfinding feature visible throughout the Zoo.
However, around 2000, its twin spires were removed, effectively negating this function. In
2011, the building’s roof canopy was cut back on the east side to accommodate the adjacent
carousel.

As a whole, the Zoo does not possess historical significance under CEQA or the City’s
thresholds. The Zoo was not the first zoo to be constructed in Los Angeles, nor was it of
exceptional size or quality upon its original opening. It is not associated with an event or

¹ This calculation excludes the Gottlieb Animal Health and Conservation Center, California Condor Rescue Zone, and
parking lot improvements.
person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory. It is not a source of answers for historical research. It is less than 100 years old and has undergone significant redevelopment renovations or expansions for every decade since its opening in 1966. As currently developed, the Zoo no longer represents the original 1966 setting as designed by Charles Luckman Associates, nor is it a wholly updated facility from a later period. Rather, it is an amalgamation of animal exhibits, visitor amenities and other features which do not represent any particular design or plan, approach to zoological design, or period of development.

As such, due to previous renovations and expansions facilities within the Project site, potentially historic structures no longer retain historical integrity or overarching uniform character, indicating there are no individually eligible structures or a potential historic district associated with the Zoo. The Project site does not contain any historical resources as defined by CEQA, and therefore there is no potential for impacts to historical resources as a result of the proposed Project. Therefore, Project impacts to historic resources would be less than significant.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Under the proposed Project, redevelopment involving grading, excavation, and earth moving activities would occur on the Zoo’s previously developed interior and undeveloped hillsides. Excavation depths would potential range from surificial grading to approximately 30 feet below ground surface (bgs) for building foundations and structural footings. These excavations would be associated with the three proposed Visitor Centers in the California, Africa, and Asia planning areas, as well as the proposed aerial tram system traversing the Zoo from the Orientation Plaza to the Africa Visitor Center. While most of the developed areas of the Zoo overly artificial fill that was previously graded and disturbed during original Zoo construction in 1966, there is a potential for disturbance of native soils at depth below the artificial fill or on undeveloped hillsides in the California and Africa planning areas.

No previously recorded archaeological sites occur on the Project site (Appendix G). A ground surface survey was conducted to assess the presence or absence of cultural resources on site. No archaeological resources or unique geographical features were recorded in the assessment. Further, the potential for prehistoric resources is low in areas formerly developed as part of the original Zoo construction and on slopes over 20 percent.

Implementation of the proposed Project would involve the subsurface excavation of previously undisturbed hillsides of Africa and California Planning areas. These areas comprise steep slopes exceeding 20 percent, making them unlikely to have been used for prehistoric occupation or activity. Additionally, a ground surface survey conducted in these planning areas indicated no resources on site. The interior areas of the Project site are relatively level and more likely to have been used by prehistoric persons. However, these areas have been substantially disturbed by previous grading and development involving the
removal of native surface soils. Existing visitor walkways and exhibit topography were constructed from artificial, uncompacted fill. Walkways were cut between 6 feet and approximately 15 feet below the original and constructed topographic surfaces. Subsurface utilities including electrical lines, sewer laterals, and water pipes have also been excavated and installed throughout the Zoo. Consequently, these interior developed areas of the Zoo and highly unlikely to contain any intact, previously undisturbed cultural resources. Therefore, the potential for proposed Project improvements to impact unknown cultural resources is very low, but not impossible.

To address the potential for incidental discovery of prehistoric cultural resources during phased construction of the Project, MM CUL-1 would be implemented prior to ground disturbance for each Project phase to ensure that, in the unlikely event isolated unknown prehistoric and historic-period archaeological resources are encountered during construction activities, appropriate action would be taken to prevent adverse impacts. In the unlikely event that previously unidentified archaeological resources are discovered during Project construction, through implementation of MM CUL-2 any inadvertently discovered resources would be protected and curated, so that impacts are mitigated. Therefore, Project impacts to potential prehistoric resources would be less than significant with mitigation.

CUL-3: Would the project disturb any human remains, including those interred outside of formal cemeteries?

As described in CUL-2 above, the majority of the Project site has previously been developed/disturbed during construction of the Zoo, and undeveloped hillsides are unlikely to have supported prehistoric activity or occupation. Therefore, the possibility of discovering human remains during Project construction is very low. If, however, in the unlikely event that previously unidentified human remains are discovered, further disturbances and construction activities shall stop in any area or nearby area suspected to overlie remains in accordance with State Health and Safety Code Section 7050.5, and the Los Angeles County Coroner would be contacted in accordance with Title 14, CCR, Section 15064.5(e). Pursuant to PRC Section 5097.98, if the coroner determines that the human remains are of Native American origin, the NAHC would be notified. Arrangements for the human remains would be made, and further provisions of PRC Section 5097.98 are to be followed as applicable. Further, implementation of MM CUL-3 would ensure the protection and curation of any inadvertently discovered. Impacts would be less than significant with mitigation.

CUL-4: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or that is a resource determined by the lead agency, in its discretion and
As described in CUL-1 and CUL-2, there are no known cultural resources that are eligible for listing in the CRHR or in a local register within the Project site or that may be adversely affected by the Project. However, through consultation with Native American tribal representatives, there is potential for impacts to tribal cultural resources, including buried resources and cultural landscapes. Given the Project setting where the Gabrieleño/Tongva have occupied the Los Angeles Basin for thousands of years, this analysis considers the proximity of the site to the village of Cahuenga located west of Griffith Park, the rancheria of Maugna located in the vicinity of Griffith Park; a sacred natural springs utilized for medicinal purposes located in the general region, and the ethnographic landscape. No tribal cultural resources are specifically identified on site.

Due to previous ground disturbance and development within the interior of the Project site, there is little potential for the discovery of unknown buried tribal cultural resources during construction activities within the developed portions of the Project site. Nonetheless, the proposed Project would involve substantial ground disturbance in currently undeveloped areas within the Zoo that are proposed for development (i.e., Africa and California planning areas). Although these areas are considered unlikely to have supported prehistoric activity due to their steep slopes, the potential exists for the proposed Project to result in the discovery, alteration, removal, or destruction of tribal cultural resources, including objects, sites, or features with value to a California Native American tribe. With implementation of MM CUL-4 through MM CUL-7, requiring the monitoring of all construction activities by an appropriate Native American representative and the management of resources in the unlikely event that such resources are uncovered, impacts would be less than significant with mitigation.

3.4.4 Mitigation Measures

**MM CUL 1 Pre-Construction Workshop**

Prior to any ground disturbance activities during construction of each Project phase, a City-qualified archaeologist and shall conduct a cultural resources workshop for all construction personnel. The City-qualified archaeologist must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a Principal Investigator working with Native American archaeological sites in southern California. The qualified archaeologist will ensure that all other personnel are appropriately trained and qualified. The workshop will inform all construction personnel of the types of cultural material that may be encountered, and of the proper procedures to be followed in the event of an unexpected discovery of cultural material or human remains. Appropriate documentation will be completed to demonstrate attendance.
**MM CUL 2 Unexpected Discovery of Cultural Material**

In the event unexpected cultural resource material - such as flaked or ground stone, historic debris, building foundations, or non-human bone - is discovered during Project-related ground disturbances, construction personnel will stop all work within 50 feet of the discovery until a City-qualified archaeologist can evaluate the discovery for significance. Construction personnel will contact the City and Zoo staff immediately. Activities that may adversely impact the discovery will not resume without written authorization from the City that construction may proceed. The nature, extent, and significance of the discovery will be evaluated by a City-qualified archaeologist, and a Native American representative if the discovered resource is prehistoric. If the discovery is determined to be a significant cultural resource under CEQA, avoidance is the primary method of mitigation. If avoidance is not feasible, the City-qualified archaeologist will prepare a treatment plan consistent with CEQA Guidelines Section 15064.5(f) that addresses implementation of data recovery mitigation excavations. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation and public interpretation. A report of findings shall be prepared, and recovered materials curated, if needed, in an approved facility.

**MM CUL-3 Unexpected Discovery of Human Remains**

In the event human remains are encountered during Project-related ground disturbances, construction personnel will stop all work in the vicinity of the discovery and immediately contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. The City and Zoo staff will also be contacted. If the County Coroner determines the remains are prehistoric, the Coroner will contact the Native American Heritage Commission and the Native American Heritage Commission shall designate a Most Likely Descendant.

**MM CUL-4 Native American Monitoring**

A Native American representative approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and the NAHC will monitor ground disturbing construction activities. Ground disturbing construction activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that include, but are not limited to, pavement removal, pot-holing or augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. The Native American representative will complete daily monitoring logs that will provide the location of construction activities, and a description of the soil and any cultural materials identified. Native American monitoring will be terminated when all ground disturbing construction activities are complete or when the Native American representative determines that the proposed Project site has a low potential for impacting Tribal Cultural Resources during each phase of Project implementation. Native American monitoring during
ground disturbing construction activities will be conducted consistent with current professional standards.

**MM CUL-5 Unanticipated Discovery of Tribal Cultural and Archaeological Resources**

Pursuant to MM CUL-2, upon discovery of any archaeological resources, construction activities will cease in the immediate vicinity of the discovery until the discovery can be assessed. All archaeological resources identified during Project construction activities will be evaluated by the Native American representative approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation will coordinate with the City and the Zoo regarding treatment and curation of the resources including reburial or preservation for educational purposes. Per AR-2, if the discovery is a significant resource, avoidance measures or appropriate mitigation will be implemented.

**MM CUL-6 Preservation of Unique Archeological Resources**

If unique archaeological resources are discovered, preservation in place (i.e., avoidance) will be the preferred manner of treatment consistent with Public Resources Code Section 21083.2(b). If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resources and subsequent laboratory processing and analysis. Historic archaeological material that is not Native American in origin will be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it will be offered to a local school or historical society for educational purposes.

**MM CUL-7 Unanticipated Discovery of Human Remains and Associated Funerary Objects**

PRC Section 5097.98(d)(1) defines Native American human remains as an inhumation or cremation in any state of decomposition or skeletal completeness. Consistent with MM CUL-3, in the event human skeletal material is discovered, excavation will be stopped, and the discovery will be immediately reported to the Los Angeles County Coroner consistent with Health and Safety Code 7050.5. If the County Coroner recognizes the human remains to be Native American or has reason to believe the remains are Native American, the County Coroner will contact the NAHC within 24 hours. Public Resources Code 5097.98 will be followed.

In the event human skeletal material is discovered, the following will occur:

- The Native American representative monitor will immediately redirect construction activity a minimum of 150 feet from the discovery and place an exclusion zone around the discovery. The Native American representative will contact the construction manager who will then contact the Los Angeles County Coroner. The Native American representative will also contact the Gabrieleño Band of Mission Indians-Kizh Nation,
a City-qualified archaeologist, the City, and the Zoo. Construction activity will continue to be redirected while the County Coroner determines whether the human skeletal material is Native American. The discovery will be kept confidential and secure to prevent further disturbance. If the human skeletal material is determined to be Native American, the County Coroner will notify the NAHC. The NAHC will then appoint a Most Likely Descendant.

- Funerary objects/associated grave goods will be treated in the same manner as bone fragments.
- If discovered human remains cannot be fully documented and recorded on the same day, the remains will be covered with muslin cloth. A steel plate will be placed over the discovery to protect the remains. If a steel plate is not available, a 24-hour guard will be present onsite outside of regular construction hours.
- Redirecting construction activities to protect the human remains in place will be recommended if feasible. If construction activities cannot be redirected, the burials may be removed. Cremations will be removed in bulk or by any means necessary to ensure complete recovery of all material. The Gabrieleño Band of Mission Indians-Kizh Nation will work closely with the City-qualified archaeologist to ensure that any excavation to remove human remains is conducted carefully, ethically, and respectfully.
- If the discovery of human remains includes four or more burials, the location will be considered a cemetery and a separate treatment plan will be prepared.
- If data recovery excavations are approved by the Gabrieleño Band of Mission Indians-Kizh Nation, documentation will include detailed descriptive notes and sketches at a minimum. Additional documentation will be approved by the Gabrieleño Band of Mission Indians-Kizh Nation.
- All feasible care will be taken to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects.
- Scientific study of the human remains, including the use of invasive diagnostic procedures/techniques, will not be conducted.
- Each discovery of human remains or associated funerary objects will be stored in opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony will be removed to a secure container on-site if possible. These items will be retained and reburied within six months of discovery.
- Prior to the resumption of ground disturbing construction activities, the Zoo will designate a location within the proposed Project site for the respectful reburial of the human remains and/or funerary objects. The reburial/repatriation site will be a location agreed upon between the Gabrieleño Band of Mission Indians-Kizh Nation and the Zoo to be protected in perpetuity.
- There will be no publicity regarding a discovery of human remains.
• A final report will be submitted to the Gabrieleño Band of Mission Indians-Kizh Nation and the NAHC.

3.4.5 Impacts Summary

With implementation of the above identified mitigation measures, impacts to cultural and historical resources would be less than significant. There would be no unavoidable adverse impacts on cultural, historical, or tribal resources associated with implementation of the proposed Project.