

Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section addresses potential impacts to cultural resources—including historical and archaeological resources—that could result from implementation of the Project. Historical Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological Resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory.

This section is based on information and findings contained in the *Historic Resource Assessment and Conformance Review, 1246-1248 South Hope Street Los Angeles, California* (Historic Resource Assessment) prepared by Chattel, Inc., *The Morrison, Los Angeles, California, Historical Resource Technical Report* (Historical Report) prepared by GPA Consulting, and the *Archaeological and Paleontological Resources Assessment for the Morrison Project, City of Los Angeles, Los Angeles County, California* (Archaeological Assessment) prepared by Dudek. These documents are attached to this Draft EIR as **Appendices C.1, C.2, and E**, respectively.

2. Environmental Setting

a) Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, state, and local laws governing and influencing the preservation of cultural resources of national, state, regional, and local significance include:

- The National Historic Preservation Act of 1966, as amended;
- The Secretary of the Interior's Standards (Secretary's Standards);
- The Native American Graves Protection and Repatriation Act;
- The Archaeological Resources Protection Act;
- The Archaeological Data Preservation Act;
- The California Environmental Quality Act (CEQA);

- The California Register of Historical Resources (California Register);
- The California Health and Safety Code;
- The California Public Resources Code;
- The City of Los Angeles General Plan;
- The City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171);
- The City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code, Section 12.20.3); and
- The City of Los Angeles Historic Resources Survey

(1) Federal

(a) *National Historic Preservation Act and National Register of Historic Places*

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) 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”.¹ The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.²

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.³

A district is defined as a geographically defined area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical

¹ 36 Code of Federal Regulations (CFR) 60.

² United States Department of the Interior, National Park Service, *National Historic Landmarks Frequently Asked Questions*.

³ United States Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 5*.

development. A district's significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁴

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.

A resource that is listed in or eligible for listing in the National Register is considered "historic property" under Section 106 of the National Historic Preservation Act.

(i) *Criteria*

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 Code of Federal Regulations, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

- 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; or

⁴ *United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, page 12.*

D. Have yielded, or may be likely to yield, information important in prehistory or history.⁵

(ii) *Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning... is made clear.”⁶ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(iii) *Integrity*

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance”.⁷ The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. Some buildings or features may be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

(iv) *Criteria Considerations*

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Consideration A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.⁸ Criteria Consideration G is intended to prevent the listing of properties

5 *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 8.*

6 *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pages 7 and 8.*

7 *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 44.*

8 *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 25.*

for which insufficient time may have passed to allow the proper evaluation of its historical importance.⁹ The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

(b) Secretary of the Interior's Standards

The National Park Service issued the Secretary's Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary's Standards. Although none of the four treatments as a whole applies specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary's Standards for Rehabilitation provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

⁹ *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 41.*

3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.¹⁰

It is important to note that the Secretary's Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

¹⁰ *United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating Restoring, and Reconstructing Historic Buildings, 2017.*

(c) *Native American Graves Protection and Repatriation Act*

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.¹¹

(d) *Archaeological Resources Protection Act*

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.¹²

(e) *Archaeological Data Preservation Act*

The Archaeological Data Preservation Act (ADPA) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

(2) State

(a) *California Environmental Quality Act*

The California Environmental Quality Act is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (Section 21084.1), a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognize that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in 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,

¹¹ *United States Department of the Interior, National Park Service, Native American Graves Protection And Repatriation Act.*

¹² *United States Department of the Interior, National Park Service, Technical Brief # 20: Archeological Damage Assessment: Legal Basis and Methods, 2007.*

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.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and Section 15064.5 of the CEQA Guidelines apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- 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; or,
- 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 PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that 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.¹³ If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.¹⁴

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired".¹⁵ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

¹³ *California Public Resources Code Section 21083.1(a).*

¹⁴ *State CEQA Statute and Guidelines, Section 15064.5(c)(4).*

¹⁵ *State CEQA Guidelines, Section 15064.5(b)(1).*

- B. 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 a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less-than-significant.¹⁶

(b) *California Register of Historical Resources*

The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁷ The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.¹⁸ Certain resources are determined statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

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

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

¹⁶ *State CEQA Guidelines, 15064.5(b)(3).*

¹⁷ *California Public Resources Code, Section 5024.1[a].*

¹⁸ *California Public Resources Code, Section 5024.1[b].*

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

(c) *California Health and Safety Code*

California Health and Safety Code sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resource Code), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

(d) *California Public Resources Code*

California PRC Section 5097.98, as amended by Assembly Bill 2641, 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 take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County 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. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

(3) Local

(a) *City of Los Angeles General Plan*

(i) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.¹⁹

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

(b) *City of Los Angeles Cultural Heritage Ordinance*

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The four criteria for HCM designation are stated below:

- The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community is reflected or exemplified; or

¹⁹ *City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5.*

- The proposed HCM is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.²⁰

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and Office of Historic Resources (OHR) staff often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a “master” architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained “integrity”? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Building Department “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an

²⁰ *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

application and pay all fees for the CEQA Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”²¹

(c) *City of Los Angeles Historic Preservation Overlay Zone Ordinance*

The Los Angeles City Council adopted the ordinance enabling the creation of HPOZs in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.²² Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.²³ For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

(d) *City of Los Angeles Historic Resources Survey*

The City of Los Angeles Historic Resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially significant historic resources representing important themes in the City’s history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning’s OHR. The program was managed by the OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City’s growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry,

²¹ *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

²² *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

²³ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan Area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by Community Redevelopment Agencies. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles' citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historic resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historic resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

b) Existing Conditions

Historic Context

The Project Site is located in the South Park area of Downtown Los Angeles (Downtown). Between the early 1900s and the late 1920s, the Historic Core of Downtown took shape and matured into a dense urban environment extending south from the original Pueblo. Residential hotels flourished Downtown and numerous buildings of the type were constructed to accommodate the seasonal tourists and new residents who arrived in the city by train. These buildings were classified as hotels, though most functioned as short-term apartments without private kitchens. By the early 1900s, hotels were located throughout Downtown, providing housing for large segments of the urbanizing population. By the 1920s, buildings classified as hotels in the Historic Core varied from prestigious, high-end hotels in the financial district along Spring and Main Streets in the northeast to smaller rooming houses in the southwest along Pico Boulevard. Hotels of all classes were designed by noted local architects as bold architectural statements that

showcased a mastery and appreciation of the Beaux Arts architectural tradition concurrently in the eastern United States.²⁴

In the early 1900s, the block containing the Project Site was known as Fiesta Park, a parade ground used for annual festivals, sports games, and police drills. The block was owned by Victor Ponet (1836-1914), a City pioneer, frame maker, banker, real estate developer, and later, consul from Belgium who owned large tracts of land in Los Angeles County, primarily north of Sunset Boulevard in the area now known as West Hollywood. Ponet began developing the southern half of Fiesta Park in 1906 with the construction of the Ponet Square Hotel at the corner of Grand Avenue and Pico Boulevard, east of the Project Site. The Ponet Square Hotel was one of the City's largest hotels at the time of its construction. Ponet commissioned a separate hotel, which became the Morrison Hotel, for the southwest corner of the Fiesta Park block in 1913.²⁵

The area around the Ponet Square Hotel and Morrison Hotel became an early center of automobile sales and repair in the City after the Motor Car Dealers of Los Angeles staged their first automobile show at the remaining Fiesta Park grounds adjacent to the Ponet Square Hotel in 1910. The area would be dominated by automobile-related businesses from the 1920s through 1960s. After World War II, the Downtown core experienced a period of precipitous decline as businesses and middle and upper-income residents left for more suburban environments. In the 1960s, offices and financial institutions relocated to new skyscrapers erected on and around Bunker Hill, steadily vacating older commercial buildings. By the 1970s, many of the older buildings were unoccupied above the ground story, and some were abandoned altogether. As automobile dealerships followed customers to new suburban developments, the light industrial buildings of Downtown were converted to garages or distribution centers. A fire destroyed the Ponet Square Hotel in 1970. At the time, it was the city's worst fire loss of life and led to new life safety requirements for older hotel buildings.²⁶

Morrison Hotel

The Morrison Hotel was commissioned by Victor Ponet in 1913. The architects of the building were Morgan, Walls & Morgan, one of the most prominent and prolific architecture firms in the City at the time. From 1876 to 1937, the firm was responsible for many of the city's major landmarks and its contribution to the architectural character of Los Angeles cannot be understated. Morgan & Walls, and later Morgan, Walls & Morgan, produced designs for hotels, theaters, commercial, and industrial buildings. The Morrison Hotel is a rare extant example of a typical building designed by the firm during the 1910s that contributed to the firm's reputation as the most prolific architects of early twentieth century Los Angeles.

The builder was F.O. Engstrum, a recognized authority on apartment house construction whose company was the largest construction firm west of Chicago. Though originally designed without

²⁴ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 8-11.*

²⁵ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 8-11.*

²⁶ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 8-11.*

a name, the building was listed as the Morrison Hotel by 1915. The name may have been a reference to the Morrison Hotel in Chicago, one of the premier American hotels of the 1910s. No early connection could be established between the City's Morrison Hotel and a person named Morrison.²⁷

During the 1910s and 1920s, the Morrison Hotel was home to a variety of lodgers. Many residential tenants worked in the automobile industry. The ground floor retail spaces of the Morrison Hotel were occupied by the Morrison Hotel Café, a corner drug store, and businesses selling automobile-related accessories such as tires. The Morrison Hotel achieved some fame in 1970 when The Doors, a rock band whose lead singer was Jim Morrison, released an album called *Morrison Hotel* and shot the cover images in the hotel's café and entryway.²⁸

The area around the Project Site, including the Morrison Hotel, slowly declined in tandem with Downtown during the 1960s and 1970s. Many of the buildings on the Project Site became warehouses for commercial equipment and electrical companies.

Alterations

In 1936, interior alterations to the Morrison Hotel building were made, including adding bathrooms to six rooms, adding new plaster partitions, cutting doors in existing walls, and changes to lights and bathroom ventilation. The building was reroofed in 1939 and again in 1990. In 1951, the raised parapet and projecting (likely sheet metal) cornice was removed to comply with the 1948 parapet correction ordinance in the City.

In 1989, seismic work was completed consistent with Division 88 Earthquake Hazard Reduction in Existing Buildings. Typical of Division 88 compliance work, the floor and roof elements were anchored to the exterior unreinforced masonry perimeter walls and shear walls consisting of reinforced concrete masonry unit (CMU) block were added. Anchor plates are visible at upper floor levels on all elevations. Some windows and storefronts are visibly enclosed with CMU block.

Existing Structural Considerations

The Morrison Hotel is a four-story unreinforced masonry (URM) building. The upper levels of the Morrison Hotel are supported on the 1st floor by double steel girders and columns. The girders, columns, and their connections are encased in concrete and are supporting a heavy load of URM walls and the wood floors for all the upper levels. The URM walls around the perimeter of the two light wells and the load bearing corridor walls are all supported by these steel girders and columns. This design feature accommodates the open 1st floor retail spaces and is a unique feature of a building from this era. See **Figures IV.B-1 through IV.B-3**, below, which show original architectural drawings of the hotel. This design impacts the ability to complete a comprehensive structural investigation, as discussed in detail below. The existing wood framing, steel beams, and column supports on all levels have also been damaged and have deteriorated extensively

²⁷ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report*, May 2019, adapted from pages 8-15.

²⁸ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report*, May 2019, adapted from pages 8-15.

due to exposure to weather, fire, dry rot, and lack of maintenance as a vacant building for over 15 years.

To assess the structural integrity of the Morrison Hotel, Englekirk Structural Engineers, Inc. (Englekirk) and Accu-Test Structural Laboratories, Inc. (Accu-Test) performed structural testing as part of a conditions assessment of the wood framing member and structural steel sections in accessible areas on all four levels and the roof. Accu-Test was able to test the exposed double steel girders, columns, and connections on the 1st floor not encased in concrete. The accessible steel beams and columns showed signs of extensive corrosion. Many of the steel girders, columns, and connections are inaccessible and not visible, so sizing, connections and other critical factors could not be documented or otherwise tested comprehensively. Given the scope of testing due to the inaccessibility, Englekirk determined that “there is a great possibility that there [is] hidden damage to the wood and steel members which [is] not visible or accessible.”²⁹

Comprehensive testing would require removal of concrete to expose and assess the beams and their connections. Englekirk deemed this level of testing infeasible due to the damage it might cause to the URM walls, steel girders, columns, and connections that are supporting the substantial weight of the upper levels of the building. Any damage to these members due to material deterioration or additional forces might further compromise the original strength for which the steel elements were designed.

Englekirk concluded that the building is unsafe in its current condition and to bring the building into compliance with Life Safety and Collapse Prevention requirements, the building would need a comprehensive materials assessment of all steel girders, columns, and connections and implementation of a comprehensive seismic retrofit program. Englekirk concluded that a comprehensive materials assessment is not feasible given that the steel girders and columns on the 1st floor are encased in concrete and supporting the URM walls and wood floors on the upper levels.³⁰

While not proposed as part of the Project, for informational purposes Englekirk prepared a seismic retrofit program that illustrates preliminarily the necessary seismic upgrades to retain the existing Morrison Hotel based on provisions of ASCE 41-13, Seismic Rehabilitation of Existing Buildings and the 2016 California Building Code, Chapter 4 Prescription Compliance Method. A full seismic retrofit of the building would require substantial improvements, including, but not limited to shotcrete shear walls around the perimeter of the building and around the light wells; new anchor connections between the URM walls and the wood diaphragm; and new plywood diaphragms throughout the floors over the existing diagonal sheathing. This seismic program was created based on the limited testing that could be completed.

²⁹ *Chattel, Inc. Historic Resource Assessment and Conformance Review, 1246-1248 South Hope Street, Los Angeles, California, May 2021, Attachment H, adapted from page 379.*

³⁰ *Chattel, Inc. Historic Resource Assessment and Conformance Review, 1246-1248 South Hope Street, Los Angeles, California, May 2021, Attachment H, adapted from page 380.*

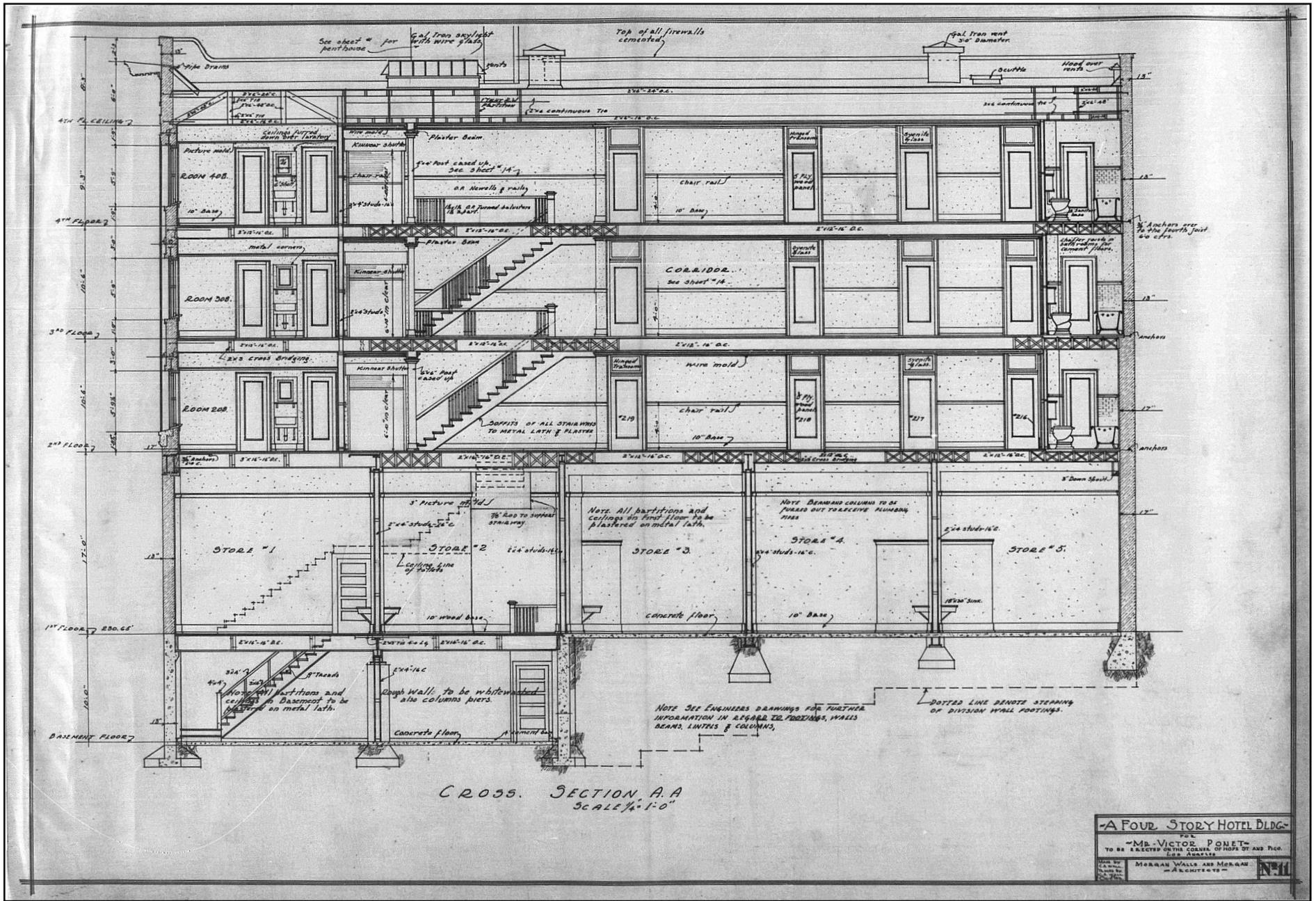


Figure IV.B-1
Original Cross Section Drawing

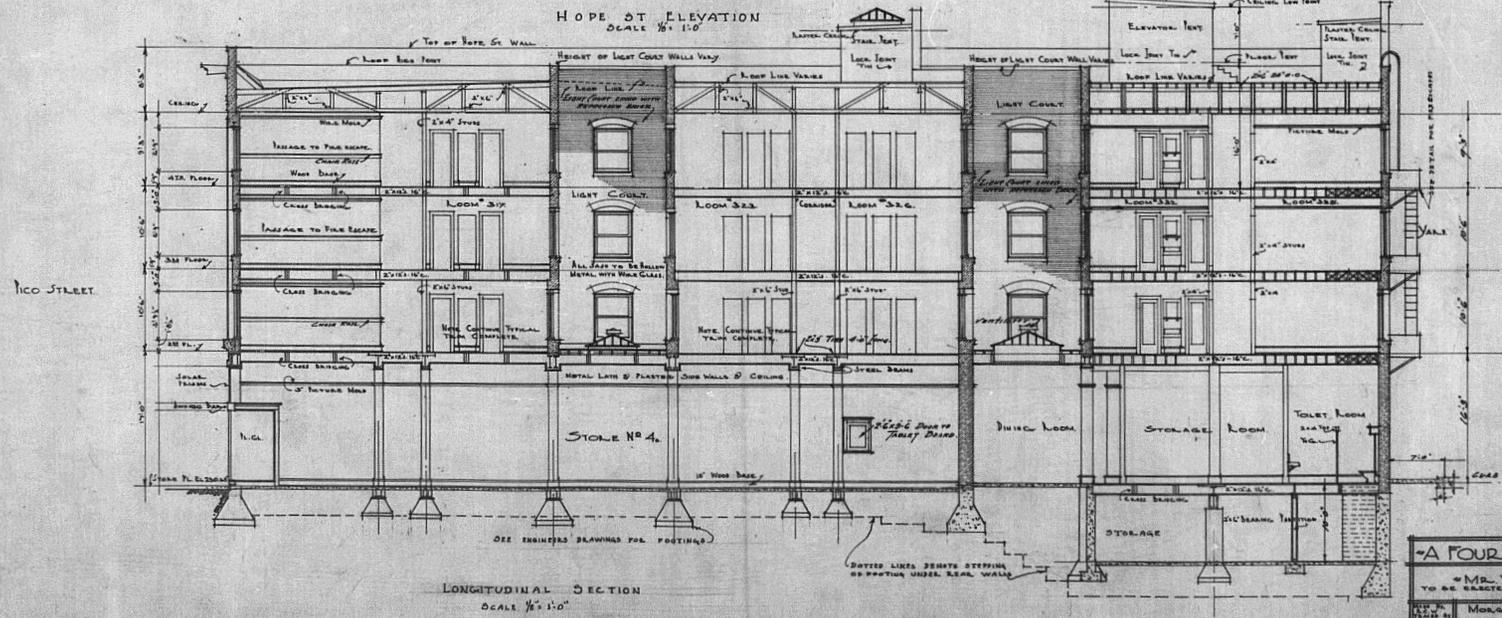


Figure IV.B-3
Original Hope Street Elevation and Longitudinal Section Drawing

Historic Evaluation

As part of the preparation of the Historical Report, a records search was conducted at the South Central Coastal Information Center (SCCIC) to determine whether the Project Site contains any properties that are currently listed under national, State, or local landmark or historic district programs and whether any properties have been previously identified or evaluated as potential historical resources. This involved a review of the California Historical Resources Inventory System (CHRIS), which includes data on properties listed and determined eligible for listing in the National Register, listed and determined eligible for listing in the California Register, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resources surveys and other planning activities. The Los Angeles Historic Resource Inventory website, HistoricPlacesLA.org was also consulted to determine if any listed historical resources were located on the Project Site. In addition, the SurveyLA findings for the Central City Community Plan Area were also consulted to determine if the Project Site buildings or parcels were identified as potential historical resources.

The Historic Resources Consultants also researched the study area at local libraries and archives to establish the general history and context, including a review of the relevant databases, newspapers, directories, books, and newspaper articles. The Context/Theme/Property Type (CTP) eligibility standards formulated for the Los Angeles Citywide Historic Context Statement were also consulted to identify the appropriate CTPs under which to evaluate the properties identified as potential historical resources.

The Morrison Hotel

The Project Site includes one historical resource: the Morrison Hotel. Historical resources are defined by CEQA Guidelines Section 15064.5(a), and include:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;
- (2) A resource included in a local register of historical resources, as defined in 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.

SurveyLA identified the Morrison Hotel as eligible for listing in the California Register and for designation as an HCM. The survey found the Morrison Hotel significant as an "Excellent example of a 1910s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development in Los Angeles' central business district. The building was immortalized on the album cover of The Doors' 1970 album Morrison Hotel."

SurveyLA determined that the building does not retain sufficient integrity for listing in the National Register due to alterations, including storefront modifications and window infill. For the purposes of this CEQA evaluation, the Historical Report assigned the Morrison Hotel corresponding Status Codes of 3CS and 5S3.³¹ In order to provide a conservative analysis of the Project's potential impacts, the Morrison Hotel is presumed to be a historical resource subject to CEQA, as it was identified as eligible for designation through the SurveyLA process.

Character-Defining Features

According to the National Park Service, “character refers to all those visual aspects and physical features that comprise the appearance of every historic building. Character-defining elements include the overall shape of the building, its materials, craftsmanship, decorative details, interior spaces and features, as well as the various aspects of its site and environment.”

Through in-person study of the Morrison Hotel as well as review of original drawings and historic aerial photographs, the Historic Resource Assessment and Conformance Review has identified character-defining features. The following list provides the character-defining features at the Morrison Hotel and are key to evaluating the Morrison Hotel.

“Preservation Brief 17: Architectural Character-Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character,” describes a three-step process to identifying the visual character of a historic building, (1) Overall Visual Character, (2) Visual Character at Close Range, and (3) Interior Spaces, Features and Finishes.³² The following list of character-defining features is organized based on this three-step process.

Overall Visual Character

- Overall shape and form of the four-story building, set at the northeast corner of Pico Boulevard and Hope Street
- “E”-shaped plan with two light courts above the first level
- Base, shaft, capital organization of primary elevations (south, west and partial north)
- Flat roof behind raised brick parapet (parapet reduced)
- Regular pattern of upper-level window fenestration
- Regular pattern of ground level tall storefront with transoms

³¹ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, page 18.*

³² *United States Department of the Interior, National Park Service, Technical Preservation Services, Preservation Brief 17, Lee H. Nelson, FAIA, September 1988.*

Visual Character at Close Range

- Primary elevations facing Pico Boulevard and Hope Street, as well as north elevation return, clad in white glazed brick with tile accents and cast stone accents
- Cast stone belt course with Greek fret pattern and egg and dart soffit visually separating first level (base) and upper levels (shaft)
- Galvanized iron (sheet metal) frieze along roofline
- Wood upper-level window frames and sashes in hung configuration, generally paired
- Tall, glazed retail storefronts with transoms and bulkheads
- Sheet metal framed transom windows
- Leaded prism glass transom (prism glass non-extant)
- Marble bulkheads (non extant)
- Inset corner retail storefront at Pico Boulevard and Hope Street with glazed brick clad pier
- Cast stone entrance surround and inset hotel entrance with tile clad walls and floor (inset tiled entrance)
- Marble base in tiled entrance (non-extant)
- Metal fire escapes
- Skylights from light courts to ground level retail spaces

Interior Spaces, Features and Finishes

- Vestibule and lobby beyond inset tiled entrance
- Upper-level double loaded corridor layout with open stairs
- Pattern of guestroom doors with transoms
- Exposed cast iron columns at tall storefronts

Period of Significance

The period of significance of the Morrison Hotel is from completion in 1914 to 1950. It was at this time that the building retained all of its character-defining features as an early twentieth century single-room occupancy (SRO) hotel in downtown and retained its original raised parapet and projecting cornice. It was likely in the post-World War II period that the Morrison Hotel went from a tourist hotel offering primarily short-term stays to a hotel offering long-term affordable stays. As noted by Daniel Prosser, many SRO hotels fell into disrepair in the post-World War II period and

some were demolished in the 1960s and 1970s, supporting the idea that properties like the Morrison Hotel would have transitioned to offering long-term stays in this period.³³

The Morrison Hotel was featured on the cover for The Doors' 1970 album Morrison Hotel; however, numerous locations across Los Angeles have served as backdrops for album cover art, and such events do not typically qualify a property as eligible for designation under Criteria A/1/1 or B/2/2. Therefore, this does not appear to be an important event in the history of the building and does not impart additional significance. As described by GPA Consulting in the 2018 Historic Resources Technical Report (HRTR), the Morrison Hotel achieved "some fame" from this event but does not appear eligible for this association. The Morrison Hotel also does not appear eligible for association with band frontman Jim Morrison.

Other Onsite Potential Resources

None of the other buildings or parcels located on the Project Site are included either on CHRIS or any list of potential historical resources as determined by HistoricPlacesLA.org or SurveyLA. For the purposes of this CEQA evaluation, the HRTR evaluated three of the Project Site's buildings (1220, 1224, 1230-1240 S. Hope Street) as potential historical resources because they are over 45 years of age and proposed for demolition. The descriptions, histories, and evaluations of these buildings is presented below.

1220 S. Hope Street: One-story, masonry, commercial, vernacular building; constructed as a paint-shop in 1918; tenants included Warren Auto Works, Wagner Electric Corporation, and Leonard Harold & Co. Inc.; uses included retail, warehouse, office, and showroom; has undergone several rounds of alterations to both the interior (configuration, partitions, remodeling) and exterior (doors, windows, rear parapet).

1224 S. Hope Street: One-story, masonry, commercial building that exhibits elements of the Colonial Revival style; constructed in 1918, likely as part of the Ponet estate development of adjacent parcels; tenants included Carter Automobile Works, Electric Equipment Company, Ray Thomas Inc., AGFA ANSCO, A. Lietz Co. and various specialized goods vendors; uses included sheet metal repair and enameling, showroom, wholesale supply, and retail; has undergone substantial alterations to both the interior (configuration, partitions, remodeling) and exterior (doors, roof, storefronts, front and rear parapets).

1230-1240 S. Hope Street: One-story, masonry building constructed in 1918 for an automotive electrical equipment company; tenants included Electric Equipment Co. Inc., Wagner Electric Corp., and the Pine Tree Company; uses included automobile servicing, wholesale, and printing shop; has undergone several rounds of alterations to both the interior (two interior mezzanine floor additions) and exterior (metal window installation for the mezzanine floor, rear parapet, sandblasting and painting, seismic retrofitting); approximately 25 percent of the building was destroyed in a fire in 1968.

³³ *Chattel, Inc. Historic Resource Assessment and Conformance Review, 1246-1248 South Hope Street, Los Angeles, California, May 2021, adapted from page 16.*

The buildings appear to be three of many low-rise commercial buildings constructed in South Park during the 1910s and 1920s as the area transitioned from residential uses to mostly automobile-related commercial uses. While they are associated with the trend of development in Downtown Los Angeles, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of the City's history. Research did not indicate that the buildings' specific association with this trend could be considered important.³⁴

Research also did not indicate that the buildings were the site of significant events in commercial history. The buildings had a variety of tenants, but none of the companies appear to be significant in the history of commerce. Though one of the tenants of 1224 S. Hope Street, AGFA ANSCO, an international photographic company, may be significant in American commercial history, research did not indicate that the 1224 S. Hope Street building was the site of significant events in the company's history during the decade the firm was a tenant in the 1940s.³⁵

The Ponet estate heirs, the Montgomery family, developed properties throughout Los Angeles County during this time and there is no indication that any of the buildings were significant properties in their development portfolio or plans. The family does not appear to be significant in the history of Downtown's development during the late 1910s. No information was found to suggest that individuals of historic significance were associated with the buildings.³⁶

The buildings do not appear to be a pioneering or early example of a low-rise automobile-related property type in the area. The buildings do not exhibit the distinctive features of any particular style, and as a whole, they are neither original or unique architectural statements nor excellent examples of a style or type. The architects of 1220 S. Hope Street and 1230-1240 S. Hope Street are listed as Dodd & Richards. Select buildings designed by Dodd & Richards in Los Angeles and by William Dodd in the Midwest have been recognized as masterful; however, their commercial and light industrial vernacular work in Los Angeles has not been identified as a reflection of the firm's architectural achievements. Alterations of 1224 S. Hope Street were completed by master architect Stiles O. Clements; however, these alterations were confined to alterations to the rear elevation and interior. These areas of the building do not exhibit high quality of design, work of a master, or elements of an architectural style such as Spanish Colonial Revival. All of the buildings have been too heavily altered to contribute to a potential historic district.³⁷

³⁴ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 20-27.*

³⁵ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 20-27.*

³⁶ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 20-27.*

³⁷ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 20-27.*

Based on the above, the Historical Report concluded that 1220 S. Hope Street, 1224 S. Hope Street, and 1230-1240 S. Hope Street do not appear to be eligible for listing as a historical resource under national and State criteria A/1, B/2, or C/3, or corresponding City criteria.³⁸

Nearby Historical Resources

In addition to evaluation of the Project Site, the Historical Report established a study area to account for impacts on historical resources identified in the vicinity of the Project Site. The study area is different for each project and is based on the surrounding setting and the scope of the project being evaluated. The study area should be large enough to consider the potential impact to historical resources in the vicinity; however, the potential for impact needs to be reasonably foreseeable. As shown on **Figure IV.B-4**, for the Project, the study area includes the Project Site and parcels immediately adjacent to or opposite from the Project Site. Parcels beyond this study area were not included because the Project would have no potential to directly or indirectly impact the buildings or their setting based on their distance.

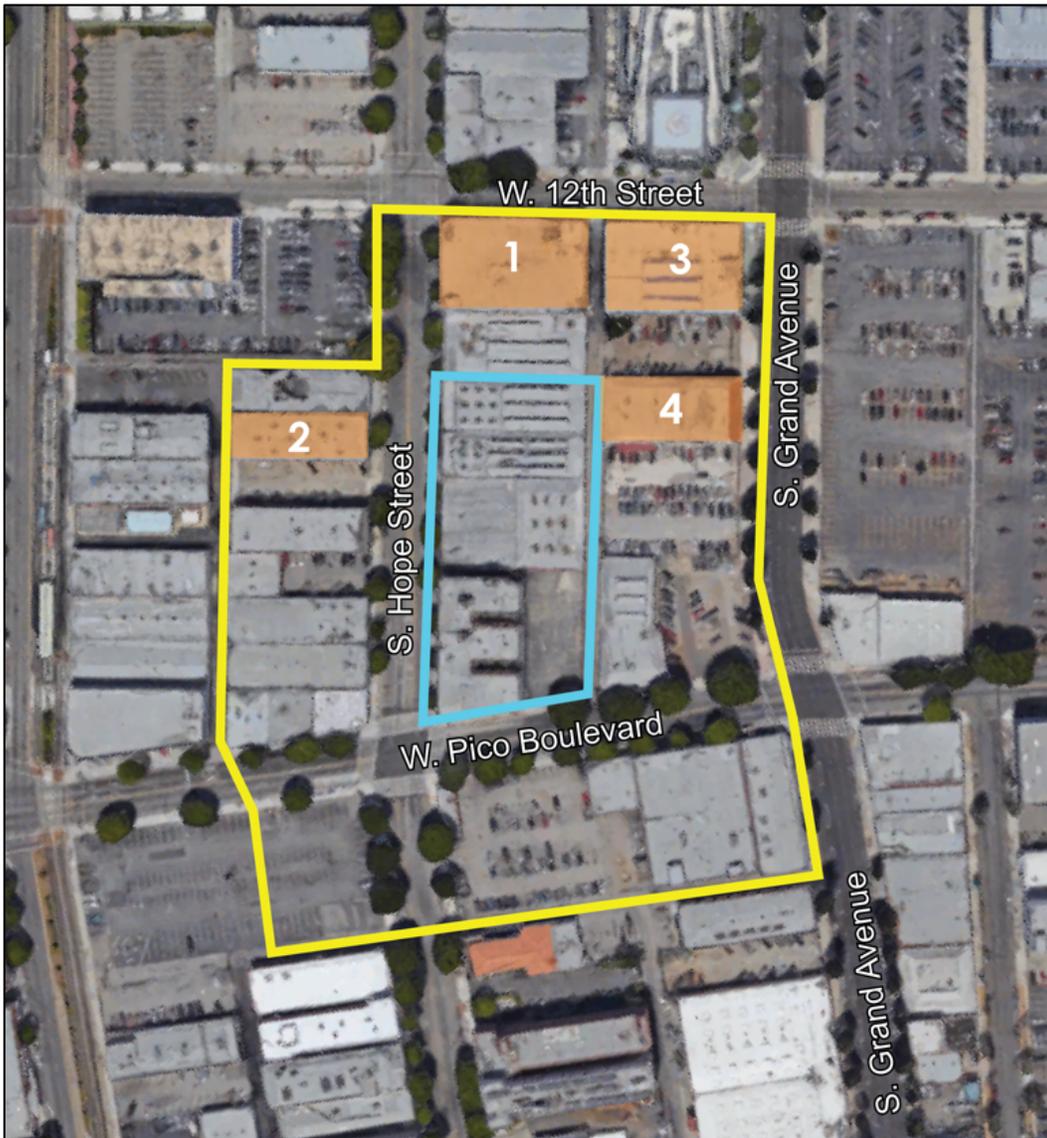
Records search results obtained through the SCCIC revealed no properties in the study area currently listed as landmarks under national, State, or local programs or previously identified or evaluated as historical resources. Within the study area, there are no historic districts that have been identified as eligible for designation. SurveyLA identified four properties as appearing eligible for designation under national, State, or local landmark programs:

- 1200 S. Hope Street, located approximately 75 feet northeast of the Project Site, on the south corner of S. Hope Street and W. 12th Street, has Status Codes 3CS and 5S3;
- 1223-1225 S. Hope Street, located approximately 80 feet northwest of the Project Site, immediately across S. Hope Street, has Status Codes 3S, 3CS, and 5S3;
- 1201 S. Grand Avenue, located approximately 95 feet northeast of the Project Site, on the western corner of S. Grand Avenue and W. 12th Street, has Status Codes 3CS and 5S3; and
- 1221-1225 S. Grand Avenue, located approximately 25 feet southeast of the Project Site, immediately across the rear alley to the east of the Site, has Status Codes 3CS and 5S3.³⁹

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³⁸ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, adapted from pages 20-27.*

³⁹ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, page 28.*



True North



Project North



Project Site



Study Area



Historical Resources in the Study Area

Base Image Courtesy of Google Maps.

Source: GPA Consulting, October 2018.

Figure IV.B-4
Historical Resources in the Study Area

Archaeological Resources

As part of the Archaeological Assessment, a data search was conducted at the SCCIC for archaeological resources within the vicinity of the Project Site. The search included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file for the Project Site and a 0.5-mile search area. The 0.5-mile radius is appropriate in developed urban areas in order to provide a relevant context with which to conduct archaeological sensitivity analysis of the Project Site. In other words, if known archeological resources are recorded within 0.5-mile of the Project Site, the potential exists for archaeological resources to also exist at the Project Site within the same geologic sediments. According to the records search, 36 cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. A total of 23 previously recorded cultural resources have been documented within a 0.5-mile of the Project Site. However, all of the 23 resources identified during the records search are historic-era buildings. No prehistoric or historic archeological resources were identified within the Project Area during the records search. Furthermore, as discussed in greater detail in **Section IV.L, Tribal Cultural Resources**, no prehistoric or historic archeological resources were identified within the Project Site during the Sacred Lands File search, or through AB 52 consultation conducted by the City. Accordingly, the Archeological Assessment determined that the likelihood for encountering significant prehistoric or historic-era archaeological resources within the Project area is considered low.⁴⁰

3. Project Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to cultural resources if it would:

Threshold a) *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; or*

Threshold b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or*

Threshold c) *Disturb any human remains, including those interred outside of dedicated cemeteries.*

For this analysis, the Appendix G Thresholds are relied upon.

⁴⁰ GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, page 19.*

b) Methodology

(1) Historical Resources

This analysis relies upon the methodology utilized in the Historical Report, which was prepared by professional individuals who meet or exceed the Secretary of the Interior's Professional Qualification Standards in history, architectural history, and historic preservation planning. Project Site inspections and property history research were conducted to document and assist in assessing the existing conditions. The Project's entitlement plans were reviewed, and visual inspection of the Project Site was also conducted.

All applicable professional standards for the identification and evaluation of historical resources were utilized in the preparation of the historic assessment, including (but not limited to):

- The Secretary of the Interior's Standards for Preservation Planning
- *National Register Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning*
- *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*
- *Instructions for Recording Historical Resources* (State of California Office of Historic Preservation)

The Project Site was evaluated for significance under applicable criteria, including those for the National Register, California Register, and local designation programs (see Regulatory Setting, above). Evaluation was conducted in light of the historic context themes and property types identified by SurveyLA. The potential impacts of the Project were analyzed in accordance with Section 15064.5 of the State CEQA Guidelines. The test for determining whether or not a proposed project would have a significant impact on an identified historical resource is whether a project may cause a substantial adverse change in the significance of an historical resource or resources. Generally, projects that follow the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards) are considered as mitigated to a level of less than significant. Though the Secretary Standards do not apply specifically to new construction in the vicinity of historical resources, Standards #9 and #10 of the Standards for Rehabilitation provide relevant guidance for such projects.

Material Impairment

Per CEQA, a proposed project anticipated to cause substantial adverse change to a historical resource would require mitigation measures to reduce impacts. CEQA Guidelines §15064.5 (b)(1) defines substantial adverse change as the following: "Substantial adverse change in the significance of a historical resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." CEQA Guidelines §15064.5 (b)(2) describes material impairment taking place when a project:

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

The Historic Resource Assessment and Conformance Review, prepared by Chattel, Inc., dated May 27, 2021, is attached to this Draft EIR as **Appendix C.1**.

(2) Archaeological Resources

To evaluate potential impacts to archaeological resources, Dudek conducted an Archaeological Assessment for the Project Site that included an archaeological data search at the SCCIC at California State University, Fullerton, as well as a site visit that included an intensive pedestrian survey, and geoarchaeological and historic map review. The SCCIC data incorporate a review of technical records of previous studies and findings related to archaeological resources. The data provided in the Archaeological Assessment were used to evaluate the environmental setting at the Project Site for archaeological resources as well as the probability of potential impacts to archaeological resources from implementation of the Project. It should be noted that the City may in its discretion permit an 86 percent parking reduction in connection with the Zone Variance to reduce parking at the Project Site from 233 vehicular parking spaces to 52 vehicular parking spaces, which would require one subterranean parking level instead of three levels as proposed by the Project.⁴¹ The analysis in this section assumes the construction of the proposed three-level subterranean parking structure, which would therefore result in a more conservative analysis than if the 86 percent parking reduction is permitted by the City for the Project because less grading would be required and the depth of the subterranean parking lot would be reduced from approximately 36 feet to approximately 12 feet.

The Archaeological Assessment's findings, in addition to the thresholds of significance enumerated below, formed the basis of the impact determination. The Archaeological Assessment, prepared by Dudek, dated June 2020, is included in this Draft EIR as **Appendix E**.

⁴¹ *The parking reduction would support the anticipated parking requirements in DTLA 2040, the City's joint update of the Central City Community Plan and Central City North Community Plan. In the current draft of DTLA 2040, the Project Site is proposed to have no parking minimums as part of the Transit Core.*

c. Project Design Features

No specific Project Design Features are proposed with regards to cultural resources.

d. Analysis of Project Impacts

Threshold a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines?

The Project involves the partial rehabilitation, reconstruction, demolition, and expansion of the existing Morrison Hotel by approximately 174,481 square feet, and the demolition of three existing buildings for the construction of a new mixed-used hotel and residential building.

(1) Impact Analysis

a) *Direct Impacts*

Morrison Hotel

The Project would include up to three levels of subterranean parking on the Site, which would necessitate the demolition of the majority of the north and full east elevations and light courts of the Morrison Hotel. While one level of subterranean parking would be constructed if the City permits the 86 percent parking reduction option, the demolition of this portion of Morrison Hotel would still be necessary. Additionally, the building is currently unsafe as is and cannot be repaired due to structural concerns. Specifically, to bring the building to the Life Safety and Collapse Prevention requirements, Englekirk recommended a seismic retrofit and comprehensive material assessments of all steel girders, steel columns, and their connections, which they determined to be infeasible due to the unique design of the Morrison Hotel.

Englekirk prepared a seismic retrofit program based on the known areas of concern, but concluded that a comprehensive materials assessment is not feasible given that the steel girders and columns on the 1st Floor are encased in concrete and supporting the URM walls and wood floors on the upper levels. Given these structural considerations, the Project necessitates partial demolition and reconstruction as described in more detail below.

Secretary's Standards

The Project would retain, rehabilitate, restores, and/or reconstruct a number of key character-defining features at the south, west and north elevations of the Existing Hotel. However, this does not make up for demolishing large portions of the building. Therefore, the Project meets some of the standards and does not meet others, and as a whole the Project is not in conformance with the Secretary's Standards. The following is an assessment of the Project for conformance with the Secretary's Standards on a standard-by-standard basis.

Standard 1: The Existing Hotel would be reused as a hotel, its historic use. Reuse of the Existing Hotel would require change to the distinctive features, spaces, and spatial relationship of the

Existing Hotel through the demolition of its “E-shape” and two light courts above the ground level, construction of a single new courtyard at the ground level, creating a “C-shape” building, and construction of a compatible new four-level podium with a 15-level tower addition at the east elevation. While it would retain its historic use, the near complete loss of two of four exterior elevations, all interior floors roof, stairs, and corridors would cause substantial change to the distinctive materials, features, spaces, and spatial relationships. Therefore, the Project is not in conformance with Standard 1.

Standard 2: The Project would alter the historic character of the Existing Hotel through the near complete loss of two of four exterior elevations, all interior floors roof, stairs, and corridors. Similar to review under Standard 1, the “E-shape” of the Existing Hotel building would be removed, and a new courtyard would be created, giving the building a “C-shape”. The lower floor of the new courtyard would be at the ground level, rather than the existing two light courts at the second level. At the south and west elevations, key character-defining features including glazed brick, cast stone door surround and inset tiled entrance with marble base, cast stone belt course with egg and dart pattern, leaded prism glass transom windows and sheet metal frames at storefront, inset corner at Pico Boulevard and Hope Street with glazed brick clad pier, and galvanized iron frieze, would be retained, rehabilitated, and reconstructed as necessary. Nevertheless, the Project would alter the historic character of the Existing Hotel by removing distinctive materials and altering features, spaces, and spatial relationships that characterize the building such that it would no longer be able to operate independently as a four-level hotel building. Therefore, the Project is not in conformance with Standard 2.

Standard 3: In conformance with Standard 3, proposed rehabilitation of the Existing Hotel has been guided by historic aerials, historic photographs, original drawings, and physical evidence. The Project does not include construction or reconstruction of any features that did not previously exist on the building and does not include construction of any features that would convey a false sense of historical development. Therefore, the Project is in conformance with Standard 3.

Standard 4: The Existing Hotel has been modified over time, including alterations to the storefronts, such as removal of original leaded prism glass storefront transom windows, removal of original raised parapet and projecting cornice, overpaint of cast stone elements, galvanized iron frieze, and some glazed brick, infill of some upper-level windows, and installation of anchor plates across all elevations. None of these alterations were found to have taken on significance over time. The majority of these alterations would be removed by the Project. However, some of the original features of the Existing Hotel (e.g., raised parapet, cornice, leaded prism glass storefront, etc.), which have been removed, will be reconstructed as part of the effort to rehabilitate the primary elevations of the building to more closely align with its original appearance based on historic documentation. Therefore, the Project is in conformance with Standard 4.

Standard 5: The Project would alter the shape and form of the Existing Hotel through demolition of a large portion of the building. At the south and west elevations, key character-defining features including glazed brick, cast stone door surround and inset tiled entrance with marble base, cast stone belt course with egg and dart pattern, leaded prism glass storefront transom windows and sheet metal frames, inset corner at Pico Boulevard and Hope Street with glazed brick clad pier

would be retained, rehabilitated, and reconstructed as necessary. However, original wood windows would be completely replaced. Despite these improvements to character-defining features displaying craftsmanship, the proposed project results in a substantial loss of historic material and the original shape and form of the Existing Hotel. Therefore, the Project is not in conformance with Standard 5.

Standard 6: In conformance with Standard 6, deteriorated historic features, including glazed brick, cast stone door surround, cast stone belt course with egg and dart pattern, sheet metal transom frames, upper-level wood hung windows, and galvanized iron frieze, would be repaired rather than replaced. Where deterioration requires it, damaged or missing historic features and materials would be replaced in-kind based on physical evidence, historic photographs, and original drawings, including previously removed cornice and raised parapet. Therefore, the Project is in conformance with Standard 6.

Standard 7: In conformance with Standard 7, all treatments to the Existing Hotel would be tested in mock-ups, including those recommended by the conservator to ensure they are safe to use on historic material. This includes removal of graffiti, overpaint from glazed brick and cast stone elements, coatings from inset tiled entrance, and loose and flaking paint from window sashes and frames to prepare for repainting. All chemical and physical treatments to historic features and materials will be undertaken in the gentlest manner possible so as not to cause damage. Therefore, the Project is in conformance with Standard 7.

Standard 8: In conformance with Standard 8, should any archaeological resources be encountered at the Project Site, mitigation would be implemented to protect those resources. It should be noted that with respect to the building, the soil has been previously disturbed with construction of the building and its partial basement in 1914. It should be noted, however, that the parking lot to the east of the building has only been previously developed with a surface-parking lot, no other known soil disturbing activities have occurred. Therefore, the Project is in conformance with Standard 8.

Standard 9: The Project includes demolition of the east elevation (adjacent to existing parking lot) and a portion of the north elevation (adjacent to 1240 Hope Street) as well as light courts, the roof, and all interior spaces, including floors, stairs, and ceilings. This demolition is required to construct a three-level subterranean parking garage beneath the entire Project Site (or one level under the 86 percent parking reduction option), as well as to ensure the structural stability of the Existing Hotel. However, the Project would continue the historic use as a hotel and includes rehabilitation of the most visually recognizable character-defining features of the Existing Hotel at the south, west and partial north elevations, including ground level storefronts with transoms, glazed brick, cast stone entrance surround and inset tiled entrance, cast stone beltway, and galvanized iron frieze. Missing or altered features including some window infill and leaded prism glass storefront transoms would be restored to their original appearance. The Project includes reconstruction of upper floor levels and roof to align with existing interior floor levels. The previously removed cornice and raised parapet would be reconstructed based on historic documentation. Importantly, the Project would continue the historic use as a hotel. As such, the

Project would not destroy historic materials, features, and spatial relationships that characterize the Existing Hotel.

The 15-level Hotel Expansion to the east of the building is setback from the east and south elevations of the Existing Hotel with a recessed podium level supporting a rectangular hotel. While the 15-level Hotel Expansion is quite tall next to the building, the manner in which it is set apart on the four-level podium minimizes its mass and proportion. The four-level podium along Pico Boulevard is detailed in brick with a regular fenestration pattern of punched windows and continues the line of the reconstructed cornice and parapet of the Morrison Hotel. The portion of the Project to the east of the building would effectively read as an addition to the Morrison Hotel. The remainder of the Project Site would continue the podium datum with a 25-level residential tower to the north of the building.

While the new podium and 15-level Hotel Expansion tower to the east of the Existing Hotel building is compatible, the Hotel/Residential Tower to the north of the Existing Hotel building is in contrast. The two-level podium with high volume floors and 25-level Hotel/Residential Tower to the north along Hope Street are clad in opaque glass and physically separated from the Morrison Hotel building by the deeply recessed entry courtyard. The south side of the entry courtyard consists of partial retention and reconstruction of the north elevation of the Existing Hotel. The proposed east side of the entry would be podium height fully glazed with entrance doors opening into a high-volume hotel lobby with a grand double stair. The proposed north side of the entry would break at the podium and rise to full tower height continuing its fully glazed walls to the west elevation along Hope Street. The north tower would effectively read as a separate building near the Existing Hotel. Though the podium level would be continuous, the 25-level Hotel/Residential Tower would be set at such a distance from the Existing Hotel building that it would not read as an addition and would allow the Morrison Hotel to appear as the primary building when viewed from the southwest. While the north tower may overwhelm the four-story Morrison Hotel, the substantial separation along Hope Street and the deeply recessed entry courtyard would allow it to read as separate new construction. Therefore, the Project is in conformance with Standard 9.

Standard 10: In the Project, new utility and infrastructure systems, including exiting systems of the building, would be connected to the Hotel Expansion. If additions were removed in the future, the Existing Hotel would not be able to function on its own. Further, the Project alters the “E-shape” and light courts of the Morrison Hotel, which though on a secondary elevation, are still character-defining features. Thus, if these new additions were removed in the future, the essential form of the Morrison Hotel would be substantially altered. Therefore, the Project is not in conformance with Standard 10.

New construction of a podium that references the cornice of the building with 15-level Hotel Expansion and 25-level Hotel/Residential Tower that are substantially taller than the building may diminish its prominence at the northeast corner of Pico Boulevard and Hope Street.

Material Impairment

While general conformance with the Secretary’s Standards and Guidelines results in a less than significant impact to historical resources under CEQA, nonconformance does not necessarily

equal material impairment of historical resources under CEQA. Thus, it is possible to make a finding of nonconformance with the Secretary's Standards while also making a finding that a proposed project does not materially impair the historical resource, which would result in a less than significant impact to historical resources under CEQA.

The Project is not in conformance with Standards 1, 2, 5, and 10 of the Secretary's Standards. The Project would remove the east elevation of the Morrison Hotel and partially reconstruct the north elevation. It would demolish the majority of two of four exterior elevations, roof, and all interior floors, stairs, and corridors. The Project would also change the shape of the building from an "E-shape" to a "C-shape". The shape and form of the building and its light courts are character-defining features. Further, the Project includes construction of a 15-level hotel tower addition to the east of the Morrison Hotel, and a 25-level hotel and residential tower to the north of the Morrison Hotel (separated by a courtyard) that would change the Morrison Hotel's ability to operate independently.

However, the Project would continue the historic use as a hotel and includes rehabilitation of the most visually recognizable character-defining features of the Morrison Hotel at the south, west and partial north elevations, including ground level storefronts with transoms, glazed brick, cast stone entrance surround and inset tiled entrance, cast stone beltway, and galvanized iron frieze. Missing or altered features including some window infill and leaded prism glass storefront transoms would be restored to their original appearance. The Project includes reconstruction of upper floor levels and roof to align with existing interior floor levels. The previously removed cornice and raised parapet would be reconstructed based on historic documentation. Importantly, the Project would continue the historic use as a hotel.

Retention and rehabilitation, including restoration and reconstruction as necessary, of these key character-defining features on the primary south, west, and partial north elevations would be sufficient to convey the historic and architectural significance of the Existing Hotel as an early twentieth century Beaux-Arts tourist hotel designed by master architects Morgan, Walls and Morgan. Therefore, the restoration, reconstruction, and rehabilitation proposed by the Project would be an improvement of existing conditions for the most visually recognizable character-defining features at the Project Site, including the features on the primary south, west, and partial north elevations.

Despite the fact that the addition is a direct impact to a historical resource, the overall design is compatible, yet differentiated from Morrison Hotel building, which minimizes the impact. It is located at secondary elevations to the east and north, and the entire addition is defined by a podium consistent with the height of the Morrison Hotel. Above the podium of the addition is an inset glazed fifth floor level separating the podium from both the 15-level and 25-level towers. The four-level podium below the 15-level tower to the east would use a fenestration pattern and light-colored brick to be compatible with the adjacent historic masonry found on the south elevation. The east side of the new "C"-shaped courtyard would align with the original east property line and thus read as an adjacent building on the courtyard elevation. The two-story podium clad in glazing and 25-level tower is differentiated from the adjacent historic materials of the west and partial north elevation of the Morrison Hotel building, and is substantially physically separated from the

Morrison Hotel by the entry courtyard. The placement of the two new towers at a distance of approximately 61 feet to the north and approximately 69 feet to the east from the historic Morrison Hotel property ensure they read as separate and apart from the Morrison Hotel. The inset glazed fifth floor level of both towers creates a visual differentiation and separation, ensures that these elements do not read as rooftop additions and unifies the composition at the podium level. Construction of the addition would not alter any character-defining features of the south and west elevations, and thus allows the Morrison Hotel to retain its own identity and importantly, its prominence at the northeast corner of Hope Street and Pico Boulevard.

The Project retains, restores, rehabilitates, or reconstructs many physical characteristics of the historic Morrison Hotel building, including hotel use, west and south elevations, inset tiled entrance, and four interior floors with double loaded corridors surrounding an interior light court. Despite retaining, rehabilitating, restoring, and reconstructing certain physical characteristics and the most visually recognizable features, the Morrison Hotel would no longer be able to convey its historic significance for eligibility to be listed in the National Register, California Register, or as an HCM as an early twentieth century Beaux-Arts tourist hotel. Although the above-described exterior features would be retained, rehabilitated, restored or reconstructed and would be project benefits striving for conformance with the Secretary's Standards, the loss of all the interior historic fabric of the building, including all of the public circulation, lobby, stairs, corridors, floors, ceilings and roof structure causes material impairment under CEQA. **Accordingly, impacts to historical resources would be significant.**

Other Onsite Commercial Buildings

The Project would demolish the onsite commercial buildings located at: 1230-40 S. Hope Street, 1224 S. Hope Street, and 1220 S. Hope Street. These buildings are not historical resources as defined by CEQA. Therefore, demolition of these buildings would have no direct impacts on historical resources.

b) Indirect Impacts

As detailed in the existing setting discussion above, the Historical Report identified four offsite historical resources within the Project study area that may be indirectly impacted by the Project. Indirect impacts of the Project on these offsite historical resources could occur if the Project would cause an adverse change to the significance of these resource such that their significance is materially impaired. According to *National Register Bulletin #15*, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. Since the Project would not directly alter the offsite historical buildings, it would not have the potential to alter their feeling, association, workmanship, location, design, or materials. Therefore, potential indirect impacts of a new building on a historic building include setting.⁴² Setting refers to the physical environment of an historical resource, and involves not only where the resources is situated, but also its relationship to surrounding features and open space. Additionally, indirect

⁴² GPA Consulting, *The Morrison, Los Angeles, California, Historical Resource Technical Report, May 2019, page 38.*

impacts can be created by construction vibration damage to nearby buildings. The potential for this impact is discussed in **Section IV.H., Noise**.

The *Los Angeles Citywide Historic Context Statement (LACHCS)* prepared by the Office of Historic Resources is organized into nine broad contexts and establishes eligibility standards for associated property types. 1223-1225 S. Hope Street and 1201 S. Grand Avenue are both eligible in the Architecture and Engineering Context. For buildings to be eligible under this context, they should retain integrity of design, materials, workmanship, and feeling. 1201 S. Grand Avenue, 1200 S. Hope Street, and 1221-1225 S. Grand Avenue are also eligible in the Commercial Development and the Automobile Context under the sub-theme Car Showroom. For buildings to be eligible under this context and sub-theme, they should retain integrity of design, location, feeling, association, and materials. Therefore, because setting is not included, in the case of these offsite historical resources, setting is not an essential factor of integrity. Additionally, as all four buildings occupy their entire parcels, they have no immediate setting, only a broad setting. In the dense urban setting of the Downtown area, mid- to high-rise new construction located across the street from and within the same block as historical resources like these is not uncommon, and new development has already occurred in close proximity to these buildings. Therefore, the Project would merely introduce new visual elements to the area that is characterized by a variety of building types, heights, designs, and setbacks. Additionally, all of the offsite historical resources within the study area are visually separated from the Project Site.

Therefore, based on the above, the Project would not materially impair the offsite historic resources and they would continue to retain sufficient integrity to convey their significance as historical resources as defined by CEQA. **Accordingly, indirect impacts to historical resources would be less than significant.**

(2) Mitigation Measures

MM CUL-1 The Project Applicant or its successor shall conduct the following activities to document the existing Morrison Hotel, ensure Project design that reduces historic resource impacts, and monitor Project construction to preserve character defining features.

Historic American Building Survey

Prior to demolition and commencement of construction, Historic American Building Survey (HABS) Level II recordation shall be prepared. This documentation shall be prepared by a professional photographer with experience in large format photography and a qualified architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Documentation shall include a written narrative based primarily on information contained in this report and in the 2018 HRTR. Documentation shall record the existing appearance of the building in large format photographic negatives and contact prints. Exterior views of the building, representative interior spaces, character-defining features, as well as setting and contextual views shall be documented. The original archivally-sound documentation shall be submitted to the National Park Service

acceptance and transmittal to the Library of Congress for entry into the HABS collection.

Design Review

The Project Applicant or its successor shall retain a qualified professional historic architect meeting the Secretary of the Interior's Professional Qualification Standards to participate in design collaboration with the project team through preparation of construction documents and issuance of building permits to reduce but not eliminate historical resources impacts. The historic architect monitor shall prepare a memo to be incorporated in the construction documents summarizing treatments to the historical resource and its character-defining features. This work shall be guided by the Secretary of the Interior's Standards to ensure the proper treatment to the character-defining features of the historical resource though the proposed project may not fully conform.

Building Materials Conservation

The Project Applicant or its successor shall retain a qualified building materials conservator to advise on treatments to character-defining features. The building materials conservator shall consult with the general contractor, specialty contractors, and historic architect monitor as necessary prior to demolition and throughout the course of construction to completion. All materials treatments to existing character-defining features including rehabilitation and restoration in general, as well as reconstruction of the inset tiled entrance, shall be guided by the building materials conservator. This work shall be guided by the Secretary of the Interior's Standards and the American Institute for Conservation Code of Ethics and Guidelines for Practice.

Construction Monitoring

Once building permits for the Project have been issued, the Project Applicant or its successor shall retain a qualified historic architect to participate from preconstruction coordination to construction monitoring during demolition, excavation, and all construction phases to issuance of a permanent certificate of occupancy. The historic architect monitor shall prepare written, photographic, and illustrated documentation in a series of monthly construction monitoring reports or memos. If the Existing Hotel and its associated character-defining features are damaged or may be potentially damaged by any particular construction related activity, the historic architect monitor shall prescribe corrective measures, including halting construction in situations where such activities would imminently endanger the historical resource or its character-defining features. This work shall be guided by the Secretary of the Interior's Standards.

(3) Level of Significance After Mitigation

Implementation of proposed **MM CUL-1** reduces but does not eliminate historical resources impacts. While preparation of an Historic American Building Survey would document the Existing Hotel and design review, building material conservation, and construction monitoring would protect the character-defining features, these measures would not prevent physical change of the Existing Hotel to the extent that avoids material impairment. As the Project is not in conformance with the *Secretary of the Interior's Standards for Rehabilitation* and would result in material impairment to the historic resource, the impact cannot be mitigated to a level that is less than significant. No additional feasible mitigation measures exist. Therefore, impacts would remain significant after implementation of **MM CUL-1**.

Threshold b) Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines?

(1) Impact Analysis

As previously discussed, the results of the SCCIC archaeological records search for the Project indicate that there are no recorded archaeological resources on or within 0.5-mile of the Project Site. Furthermore, as discussed in greater detail in **Section IV.L, Tribal Cultural Resources**, no prehistoric or historic archeological resources were identified within the Project Site or surrounding area during the Sacred Lands File search, or through AB 52 consultation conducted by the City. Accordingly, the Archeological Assessment determined that the likelihood for encountering significant prehistoric or historic-era archaeological resources within the Project area is considered low.

However, the Project Site has remained largely unchanged throughout much of the twentieth century and may have capped historic deposits, such as refuse deposits or architectural features (e.g., foundations, walls, etc.) that may have been present within the Project Site or surrounding area in the late nineteenth or early twentieth century. Although development in the late nineteenth and early twentieth century likely disturbed upper layers of soil and any possible surficial deposits, it is possible that intact archaeological deposits could be preserved in deeper layers. The Project would require excavation to a maximum depth of approximately 36 feet below the existing ground surface to construct the three levels of subterranean parking, building foundations, and infrastructure and utility improvements (e.g., sewer, electrical, water, and drainage systems). If the City permits the 86 percent parking reduction option, excavation would be reduced to approximately 12 feet to construct one subterranean parking level instead of three levels, which would reduce the probability of inadvertent discovery and/or disturbance of an archaeological resource. Therefore, the Project may have significant impacts to unanticipated archaeological resources encountered during excavation that were not identified during prior construction or other human activity. **Accordingly, impacts to archaeological resources would be significant.**

(2) Mitigation Measures

MM CUL-2 The Applicant or its successor shall retain a Qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) shall be retained by the Applicant or its successor prior to the approval of demolition or grading permits. The Qualified Archaeologist shall provide technical and compliance oversight of all work as it relates to archaeological resources.

The Qualified Archaeologist shall conduct construction worker archaeological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of archaeological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Archaeologist demonstrating that the appropriate construction personnel attended the training.

The Qualified Archaeologist shall perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the Qualified Archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated.

MM CUL-3 In the event of an unanticipated discovery of archaeological materials, the contractor shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery. The discovery shall be evaluated by the Qualified Archaeologist.

If it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan (Plan) shall be prepared and implemented by the Qualified Archaeologist in consultation with the City of Los Angeles. The City of Los Angeles shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered. The Plan shall include provisions for the recovery and analysis of important data, reporting, and curation at an appropriate accredited facility. If a resource is determined to be a unique archaeological resource as defined in Section 21083.1(g), the provisions of Section 21083.2(b) shall apply.

Construction shall not resume until the Qualified Archaeologist has conferred with the City of Los Angeles on the significance of the resource and the recommendations made by the Qualified Archaeologist have been implemented to the reasonable satisfaction of the archaeologist.

(3) Level of Significance After Mitigation

Implementation of mitigation measures **MM CUL-2** would avoid impacts to unknown archaeological resources by requiring the retention and involvement of a Qualified Archaeologist to provide technical and compliance oversight of all work as it relates to archaeological resources and to conduct construction worker sensitivity training and periodic inspections of excavation and grading activities. Additionally, mitigation measure **MM CUL-3** would avoid impacts during construction in the event that archaeological resources are discovered during excavation and grading activities as all work activities in the area (within approximately 50 feet) of the discovery would be halted until such time as the Qualified Archaeologist has evaluated the finding, consulted with appropriate Native American representatives, and an Archaeological Resources Treatment Plan for the resource(s) has been prepared and implemented by the Qualified Archaeologist in consultation with the City of Los Angeles. **Therefore, with implementation of mitigation measures MM CUL-2 and MM CUL-3, impacts on archaeological resources would be less than significant.**

Threshold c) Disturb any human remains, including those interred outside of dedicated cemeteries.

As discussed in **Section V, Other CEQA Considerations**, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in **Appendix A** of this Draft EIR, there is no evidence of cemeteries or burials in the historic records for the site. As such, there are no known human remains within the Project Site. However, previously unknown human remains may exist beneath the Project Site that could be encountered during Project excavation and grading activities. While no formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project Site area, there is always a possibility that human remains could be encountered during construction. If previously unknown human remains are found during excavation, the Project would follow procedures as detailed in the California Health and Safety Code Section 7050.5. If human remains of Native American origin are discovered during Project construction, the Project would comply with State laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Section 5097), relating to the disposition of Native American burials. **Therefore, as determined in the Initial Study, in the unlikely event that any human remains are discovered during construction, compliance with regulatory requirements would reduce potential impacts to a less than significant level. As such, impacts with respect to Threshold c) would be less than significant after compliance with regulatory requirements.**

e. Cumulative Impacts

(1) Impact Analysis

a) *Historical Resources*

Cumulative impacts to historical resources occur when the Project and Related Projects (as listed in **Section III, Environmental Setting**, and shown in **Figure III-5** of this Draft EIR), when taken as a whole, affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or substantially diminish the number of historical resources within the same context and theme as the historical resources within the study area. Impacts to historical resources, if any, tend to be site specific. The Project is not located in an identified historic district. Therefore, the geographic scope for cumulative impacts to historical resources within the same context or theme is the immediate study area and the greater Downtown Los Angeles area, specifically the Central City and Central City North Community Plan Areas.

There are 172 Related Projects, six of which are located within or proximate to the study area that would have the potential to contribute to a cumulative impact to the same historical resources as the Project: Related Project No. 43, a mixed-use project proposed for 1200 S. Grand Avenue; Related Project No. 59, a mixed-use project proposed for 1102 W. 6th Street; Related Project No. 70, a mixed-use project proposed for 1212 W. Flower Street; Related Project No. 78, a mixed-use project proposed for 1247 S. Grand Avenue; Related Project No. 111, a mixed-use project proposed for 1229 S. Grand Avenue; and Related Project No. 172, a mixed-use project proposed for 1201 S. Grand Avenue. Cumulative impacts would occur if the Project and these six Related Projects cumulatively affect the existing Morrison Hotel, 1200 S. Hope Street, 1223-1225 S. Hope Street; 1201 S. Grand Avenue; or 1221-1225 S. Grand Avenue. None of these proximate Related Projects are located on the sites that are listed on national, state, or local historic registries. However, the existing office building at Related Project No. 172 was assigned by the SurveyLA findings a California Register status code of 3CS, which means “appears eligible for the California Register through a survey evaluation.” The building was additionally assigned a status code of 5S3, which means “appears to be individually eligible for local listing or designation through a survey evaluation.” Related Project No. 172 would involve removal of this building. The direct and indirect project-specific and cumulative impacts with respect to historic resources could be potentially significant and will be analyzed further in the EIR for Related Project No. 172. As of January 2022, the Draft EIR for Related Project No. 172 has not been published.

Depending on the determination of the historic resources assessment for Related Project No. 172 on whether the existing building is eligible for state and/or local listing, the Related Project may or may not result in a significant impact. Conservatively assuming that Related Project No. 172 would result in a project-specific significant impact due to the removal of the existing office building at that site, the direct cumulative impact of Related Project No. 172 and the Morrison Project would not be cumulatively significant considering that Morrison Project’s direct impacts, albeit still significant, would be minimized by the Project as the Morrison Hotel would be retained on the Project Site and the significant impact would be limited in scope. Additionally, none of the other immediate area Related Projects listed above include historic resources. Thus, while

undetermined at this time, assuming a significant impact occurs with implementation of Related Project No. 172, the cumulative impact with Morrison Project would not be cumulatively considerable, and therefore, not a significant cumulative impact.

Additionally, as discussed above, the only aspect of a resource's integrity that new construction could potentially indirectly impact is setting, however, setting is not considered by the Office of Historic Resources to be an essential factor in determining the eligibility of the contexts and sub-themes applicable to the identified historical resources. Furthermore, in the dense urban setting of the Downtown area, mid- to high-rise new construction located across the street from and within the same block as historical resources like these is not uncommon, and new development has already occurred in close proximity to these buildings. The Related Projects would merely introduce new visual elements to the area that is characterized by a variety of building types, heights, designs, and setbacks. Therefore, there would be no potential for cumulative indirect impacts to historical resources in the immediate vicinity.

Cumulative impacts to historical resources must also consider changes within the same historic district. However, as discussed in the Existing Setting, there are no historic districts that have been identified as eligible for designation located within the study area. Therefore, there would be no potential for cumulative impacts to historic districts.

Additionally, cumulative impacts to historical resources must consider whether a project substantially diminishes the number of historical resources of the same property type. As determined by SurveyLA, the Morrison Hotel was determined to be eligible for listing on the California Register and for designation as a local HCM within the "Commercial Development, 1850-1980" context, "Hotels, 1880-1980" theme. There are 14 other properties in the Central City and Central City North Community Plan Areas that share the "Commercial Development, 1850-1980" context, "Hotels, 1880-1980" theme.^{43,44} However, none of the Related Projects are located on the sites that contain these 13 properties and Related Project No. 172 includes an existing office building; therefore, they would not have the potential to diminish the number of historic resources within the "Commercial Development, 1850-1980" context, "Hotels, 1880-1980" theme. As determined by SurveyLA, 1223-1225 S. Hope Street was determined to be eligible for listing on the National Register and California Register and for designation as a local HCM within the "Architecture and Engineering, 1850-1980" context, "L.A. Modernism, 1919-1980" sub-context, "Related Responses to Modernism, 1926-1970" theme, "PWA Moderne, 1928-1945" sub-theme. There are two other properties in the Central City and Central City North Community Plan Areas that share the "Architecture and Engineering, 1850-1980" context, "L.A. Modernism, 1919-1980" sub-context, "Related Responses to Modernism, 1926-1970" theme, "PWA Moderne, 1928-1945" sub-theme.^{45,46} However, none of the Related Projects are located on the sites that contain these

⁴³ *City of Los Angeles, Office of Historic Resources, SurveyLA: Los Angeles Historic Resources Survey, Central City, Individual Resources, September 2, 2016.*

⁴⁴ *City of Los Angeles, Office of Historic Resources, SurveyLA: Los Angeles Historic Resources Survey, Central City North, Individual Resources, September 29, 2016.*

⁴⁵ *City of Los Angeles, Office of Historic Resources, SurveyLA: Los Angeles Historic Resources Survey, Central City, Individual Resources, September 2, 2016.*

⁴⁶ *City of Los Angeles, Office of Historic Resources, SurveyLA: Los Angeles Historic Resources Survey, Central City North, Individual Resources, September 29, 2016.*

two properties; therefore, they would not have the potential to diminish the number of historic resources within the “Architecture and Engineering, 1850-1980” context, “L.A. Modernism, 1919-1980” sub-context, “Related Responses to Modernism, 1926-1970” theme, “PWA Moderne, 1928-1945” sub-theme. As determined by SurveyLA, 1200 S. Hope Street, 1201 S. Grand Avenue, and 1221-1225 S. Grand Avenue were all determined to be eligible for listing on the California Register and for designation as a local HCM within the “Commercial Development, 1850-1980” context, “Commercial Development and the Automobile, 1910-1980” theme, “The Car and Car Services, 1910-1960s” sub-theme. There are 14 other properties in the Central City and Central City North Community Plan Areas that share the “Commercial Development, 1850-1980” context, “Commercial Development and the Automobile, 1910-1980” theme, “The Car and Car Services, 1910-1960s” sub-theme.^{47,48} However, none of the Related Projects are located on the sites that contain these 14 properties; therefore, they would not have the potential to diminish the number of historic resources within the “Commercial Development, 1850-1980” context, “Commercial Development and the Automobile, 1910-1980” theme, “The Car and Car Services, 1910-1960s” sub-theme.

As detailed in the Impact Analysis above, the Project would be required to comply with mitigation measure **MM CUL-1**. Implementation of the mitigation measure would document the existing building, ensure compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, and monitor construction and conservation methods during the partial rehabilitation of the Morrison Hotel. However, due to the unique features of the building and required structural upgrades, **MM CUL-1** would reduce, but not avoid, potentially significant direct impacts to the Morrison Hotel; therefore, impacts would remain significant and unavoidable. The Project would not result in indirect impacts to 1200 S. Hope Street, 1223-1225 S. Hope Street; 1201 S. Grand Avenue; or 1221-1225 S. Grand Avenue. Furthermore, there are no historic districts that have been identified as eligible for designation located within the study area and the Project would not remove any historical resources. Although the Project would result in a significant unavoidable impact to the Morrison Hotel, the Morrison Hotel would be retained on the Site and the impact would be limited in scope. Therefore, there would be no potential for cumulative impacts to historic districts or a reduction in the number of historic resources of the same property type.

Therefore, based on the above, to the extent impacts on historical resources from related projects may occur, further contribution from the Project would not be cumulatively considerable, and the cumulative impacts to historical resources associated with the Project would be less than significant.

b) Archaeological Resources

Many of the Related Projects identified in **Section III, Environmental Setting**, and shown in **Figure III-2** of this Draft EIR, would require construction and ground disturbing activities that could

⁴⁷ City of Los Angeles, Office of Historic Resources, SurveyLA: Los Angeles Historic Resources Survey, Central City, Individual Resources, September 2, 2016.

⁴⁸ City of Los Angeles, Office of Historic Resources, SurveyLA: Los Angeles Historic Resources Survey, Central City North, Individual Resources, September 29, 2016.

disturb or destroy previously unknown archaeological resources and, thereby, contribute to the loss of these resources. The potential for an individual project to affect significant archaeological resources is unknown, but given the number of Related Projects, development of these projects could expose or damage unique archaeological resources (i.e., Public Resources Code Section 21083.2), resulting in their loss. However, in most cases, these Related Projects are located in developed urban areas with sites that have been previously disturbed, and each related project would be required to comply with applicable regulatory requirements such as *CEQA Guidelines* Section 15064.5 and Section 21083.2. In addition, as part of the environmental review process for Related Projects, like the Project, it is expected that mitigation measures would be implemented as necessary to address the potential for uncovering archaeological resources.

In the event that archaeological resources are discovered, the Project is required to comply with mitigation measures MM CUL-2 and MM CUL-3 and the regulations cited above. Compliance with the mitigation measures would ensure proper identification, treatment, and preservation of any resources, and would reduce potentially significant impacts on archaeological resources to less than significant levels.

Therefore, based on the above, to the extent impacts on archaeological resources from related projects may occur, further contribution from the Project would not be cumulatively considerable, and the cumulative impacts to archaeological resources would be less than significant.

Cumulative impacts to historical and archaeological resources would be less than significant.

(2) Mitigation Measures

Cumulative impacts cultural resources would be less than significant; no mitigation would be required.

(3) Level of Significance After Mitigation

Cumulative impacts to cultural resources would be less than significant without mitigation.