

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, 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. The analysis of historical resources is based on the *Historical Resources Technical Report* (Historical Report) prepared for the Project by Architectural Resources Group, June 15, 2020, and included in Appendix C to this Draft EIR.

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 for the Treatment of Historic Properties (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 [LAMC], Section 12.20.3); and
- The City of Los Angeles Historic Resources Survey (SurveyLA).

(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

¹ 36 Code of Federal Regulations (CFR) 60.

² United States Department of the Interior, National Park Service, *National Historic Landmarks Frequently Asked Questions*, www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm, accessed February 9, 2021.

historically or functionally related properties.³ A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical 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 CFR, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

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

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

- 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
- 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.

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

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

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

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 Considerations 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 for which insufficient time may have passed to allow the proper evaluation of their 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

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

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

- 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 of the Interior'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 of the Interior's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary of the Interior'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.
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. Archeological 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 of the Interior'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.

(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. ARPA defines

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.*

¹¹ *United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, www.nps.gov/archeology/tools/laws/nagpra.htm, accessed February 9, 2021.*

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 (CEQA) 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 recognizes 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 objects, buildings, structures, sites, areas, places, records, or manuscripts 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.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 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

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

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)*, http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=21083.2, accessed February 9, 2021.

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 PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) 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 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;

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

¹⁷ *California Public Resources Code, Section 5024.1[a], http://leginfo.legislature.ca.gov/faces/codes_display_Section.xhtml?lawCode=PRC§ionNum=5024.1, accessed February 9, 2021.*

¹⁸ *California Public Resources Code, Section 5024.1[b], http://leginfo.legislature.ca.gov/faces/codes_display_Section.xhtml?lawCode=PRC§ionNum=5024.1, accessed February 9, 2021.*

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.

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 Resources 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

PRC Sections), 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 (PRC)

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)

(ii) Wilshire Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Wilshire Community Plan includes the following objectives and policies related to historical resources:

- Objective 17-1: Ensure that the Wilshire Community's historically significant resources are protected, preserved, and /or enhanced.
 - Policy 17-1.1: Encourage the preservation, maintenance, enhancement, and reuse of existing historic buildings and the restoration of original façades.
- Objective 17-2: Preserve and enhance neighborhoods having a distinctive and significant historical character.
 - Policy 17-2.1: Continue to identify and document Wilshire Community Plan Area Cultural and Historical Monuments.

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

- Objective 17-3: Encourage private owners of historical resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.
 - Policy 17-3.1: Assist private owners of historic resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.

(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 criteria for HCM designation are stated below:

- The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community; or
- The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
- The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.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?

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

- 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 Los Angeles Department of Building and Safety “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 HCMs, 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 application and pay all fees for the CEQA Initial Study and Check List, as specified in Section 19.05 of the LAMC. 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 (HPOZ)
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

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

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 (SurveyLA)

SurveyLA is a Citywide survey that identifies and documents potentially significant historical 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 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, 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 the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

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.*

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical 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 historical 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

(1) Historical Resources

(a) Historical Background and Context of the Project Site and Study Area

(i) Early Development of Beverly Grove

The Historical Report, included in Appendix C to this Draft EIR, includes a detailed description of the historical background and context of the Project Site and surrounding area. Below is a summary of the discussion included in the Historical Report.

The Project Site is located within the Wilshire Community Plan area and in the southwest section of the Beverly Grove neighborhood. The Project Site is surrounded by a multi-story condominium building from the 1970s immediately north, a large hospital complex (Cedars-Sinai Medical Center) and shopping center (the Beverly Center) farther north, multi-story apartment complexes from the 1960s to the present to the south and west, and single- and multi-family residences dating to the 1920s through the 1940s, as well as more recent commercial development to the south.

As discussed in the Historical Report, prior to the turn of the 20th century, the neighborhood remained largely undeveloped. Originally inhabited by members of the Tongva tribe, the land became part of Ranch La Brea, a 4,400-acre Mexican land grant given to Antonio Jose Rocha, in 1828. At the time, the rancho land was used for cattle and sheep grazing, and growing crops, such as barley and wheat. After the discovery of the Salt Lake Oil Field in 1902, oil drilling increased rapidly, and the area was soon covered with derricks.

Development of Beverly Grove began in the 1910s as Los Angeles' population increased and began to push westward. The increasing population, as well as the increased availability of the automobile, further launched westward residential subdivision and development. Beverly Grove was quickly filled with small-scale commercial strips on major thoroughfares, and single- and multi-family residential neighborhoods.

Los Angeles' population growth after World War I resulted in an increase in the construction of religious institutions to serve residential communities throughout the City. The year 1924 marked the most prosperous and active year in the history of the church-going community at the time, and by 1932, the City's churches were collectively valued at over 30 million. The Catholic Church community comprised the majority of Los Angeles' church-going residents in the 1920s and 1930s and had approximately 180,000 members by mid-1920s.

The expansion of the religious institutions slowed during the Great Depression. Nonetheless, the Catholic Church continued to play a significant role in the lives of Los Angeles' residents by providing relief support through charities such as St. Vincent de Paul and welcoming minority groups, particularly Mexican Americans, into the life of the Catholic Church. In 1936, Los Angeles was raised to the status of an archdiocese, making California the only state with two archbishops. St. Peter's Catholic Church, which opened in 1937, served Catholic families in Beverly Grove and other surrounding neighborhoods. St. Peter's Catholic Church would later become Our Lady of Mt. Lebanon, as discussed further below.

(ii) Development of St. Peter's Catholic Church

The Project Site, originally subdivided as part of a tract that was owned by the West Coast Oil Company, generally consisted of residential uses. By 1976, the tract had been partially improved with one-story, single-family residences. However, most construction along Burton Way did not begin until the mid-1930s and 1940s, and primarily consisted of one- and two-story residential buildings. By World War II, most of the tract had been built out.

Although subdivided into four parcels in 1924, the Project Site remained undeveloped until the construction of St. Peter's Catholic Church in 1937. In 1935, the Roman Catholic Bishop of Los Angeles and San Diego acquired the four lots at the corner of San Vicente Boulevard and Burton Way. Construction of the church began shortly thereafter. St. Peter's Catholic Church opened for Easter services in 1937 and was formally dedicated in May 1937. The overall cost was approximately \$33,000 and originally served 400 families. Construction of St. Peter's Catholic Church rectory began in 1939 and was occupied by Reverend Michael A. Lee, the church's first pastor, by 1940.

(iii) Our Lady of Mt. Lebanon

The Project Site was owned and occupied by St. Peter's Parish until 1966, the year it was sold to Our Lady of Mt. Lebanon (Mt. Lebanon), a Maronite congregation established in 1923.²⁴ The Congregation originally practiced out of a residence in Boyle Heights. By 1925, 95 families were registered with the Parish, most of whom were Lebanese and Syrian immigrants, and by 1934, the congregation had constructed a new church, hall, and rectory in place of the house.

In 1965, Father Chedid, who had become Pastor of Mt. Lebanon in 1956, began searching for a new church location more suitable to the needs of the congregation. On August 2, 1966, Mt. Lebanon moved to its new location and assumed the name Our Lady of Mt. Lebanon—St. Peter Maronite Catholic Cathedral (St. Peter's Catholic Church), in recognition of the sanctuary's original parishioners.

The St. Peter's Catholic Church site lacked a social hall, which the congregation deemed necessary for meetings and receptions. Between 1967 and 1968, the parishioners raised funds, and in 1968, construction commenced. Between 1970 and 1972, the cathedral underwent remodeling to better reflect its new parishioners.

On January 6, 1996, the cathedral was the victim of arson and suffered extensive interior damage. Some of the stencil painted sheathing and truss members at the ceiling were restored and/or reconstructed. It was during this time a children's crying room²⁵ was added at the south end of the cathedral, and a small addition to accommodate accessible restrooms was constructed at the north end of the building. After the cathedral's restoration and remodeling, the three-story office/meeting room building at the rear of the property was completed.

²⁴ *Maronites are a branch of the Catholic church historically centered in Lebanon and Syria.*

²⁵ *A cry room or crying room is a space designed for people to take babies or small children for privacy or to reduce the disturbance of others. They are usually found in churches, theatres, and cinemas.*

(b) *Building Architecture*

(i) *Architectural Styles*

The cathedral building is an excellent example of Spanish Colonial Revival architecture with Italian Renaissance Revival elements. The rectory is a modest example of the Mediterranean Revival style, and the social hall is a vernacular interpretation of New Formalism.²⁶ Each of these styles and the architects involved in the church's design are discussed below.

Spanish Colonial Revival

The Spanish Colonial Revival style, which is based on Spanish colonial architecture from the Spanish colonization of the Americas, became popular throughout Southern California after the 1915 Panama–California Exposition in San Diego. The Exposition featured buildings designed in a highly ornamented Spanish architectural aesthetic known as Churrigueresque and featured buildings designed by Bertram Grosvenor Goodhue. The buildings aimed to highlight the richness and variety of Spanish precedents found throughout Spain and Latin America. Spanish Colonial Revival was an attempt to create a “native” California architectural style, California Churrigueresque, that drew upon and romanticized the State's colonial past.

The increased popularity of the Spanish Colonial Revival style in Southern California coincided with Los Angeles' population boom in the 1920s. The versatility of the style, which allowed builders and architects to construct buildings as simple or lavish as money would permit, helped to further spread its popularity. The style's ability also lent its application to an array of building types. Spanish Colonial Revival architecture often borrowed from other more established architectural styles, including Churrigueresque, Gothic Revival, Moorish Revival, and Art Deco, and utilized complex building forms, arched openings, tile roofs, stucco cladding, decorative grilles are characteristics of the style. The style remained popular throughout the 1930s, with later versions often simpler in form or ornament.

Italian Renaissance Revival

Italian Renaissance Revival architecture emerged in the 1890s and was primarily applied to grand residential and institutional buildings. The style was considerably less common than other Revival styles, and most early examples were architect-designed and found in larger metropolitan areas. The architectural style increased in popularity in the

²⁶ *In this context, vernacular refers to architecture concerned with domestic and functional rather than public or monumental buildings.*

1920s with perfection of masonry veneering techniques. Symmetrical façades, tile roofs, masonry cladding, and classical details such as columns and pedimented entries are characteristic of the style. Italian Renaissance Revival architecture declined in popularity toward the end of the 1930s.

Mediterranean Revival

Like Spanish Colonial Revival style, Mediterranean Revival architecture became popular in Los Angeles during the 1920s. The style was significantly popular in Southern California because of California's Mediterranean climate and the popularity of Mediterranean-inspired resorts along the coast. Loosely based on 16th century Italian villas, the style is more formal in massing than Spanish Colonial Revival buildings, characterized by symmetrical façades and grand accentuated entrances. The style remained popular throughout the 1930s; its prevalence dwindled by the mid-1940s.

New Formalism

New Formalism emerged in the postwar period as a reaction against the rigidity of Modernism and its total rejection of historical precedent. The style embraced Beaux Arts symmetry and building proportions, as well as redefined classical detail such as arches, columns, entablatures, and podiums. The style utilized traditional rich materials, including marble, travertine, and granite, or manmade materials that mimicked their luxurious qualities, but applied them in a non-traditional, panelized way. New Formalism conveyed an aesthetic of stability and tradition, making it particularly suitable in the design of institutional and corporate buildings.

(ii) Architects and Designers

Ross Montgomery

Ross Montgomery was born in Toledo, Ohio in 1888 and moved with his family to Los Angeles in 1900. In 1908 he became an apprentice draftsman in a Los Angeles architecture firm, and by 1913, he had become a licensed architect and founded the firm of Montgomery & Montgomery with his brother Mott C. Montgomery. The brothers worked together for six years, primarily designing residences and commercial buildings.

In 1921, Ross Montgomery began working for the Roman Catholic Diocese. One of his first commissions was for a parochial school in Cypress Park. During the 1920s and 1930s, he designed several Period Revival-style ecclesiastical buildings throughout Southern California, including the existing cathedral on the Project Site.

Montgomery also received commissions for several churches in Los Angeles in the late 1920s, including: the Church of St. Celia, an imposing Romanesque Revival; the

Cathedral Chapel of St. Vibiana, an eclectic Spanish Colonial Revival church; and St. Andrew's Catholic Church, a Romanesque Revival church with massive masonry. Among his most noted works was the Mausoleum of the Golden West at New Calvary Cemetery in East Los Angeles. The multi-domed concrete structure represents a rare break from Montgomery's 1920s Revivalist designs and a foray into the modernist Art Deco style.

Montgomery continued to design church buildings after World War II with his associate William Mullan. As with many postwar ecclesiastical architects, Montgomery departed from his earlier ornate Romanesque Revival and Spanish Colonial Revival enterprises in favor of a more contemporary, modern style. This reflected in his plans for St. John the Evangelist and St. Kevin Catholic Church. After 48 years as an ecclesiastical architect in Southern California, Montgomery died on February 14, 1969.

Thomas Franklin Power

Thomas Franklin Power was born in Boston, Massachusetts in 1874. By 1910, he was living in Los Angeles and practicing as an architect. Early in his career, Power primarily designed single-family residences in Los Angeles and neighboring cities. By 1920s, Power had obtained commissions for a number of ecclesiastical buildings and parochial schools, including St. Mary's Catholic Church, Christ the King Roman Catholic Church, the Blessed Sacrament Church, and multiple buildings and the original campus plan for Loyola Marymount University in the mid-1920s, as well as the existing rectory on the Project Site. Power died in 1963.

Edward Jose Samaniego

Edward Jose Samaniego was born in Durango, Mexico in 1911. He and his family immigrated to El Paso, Texas in 1917, and by 1920, they were living in Los Angeles. After graduating from the University of California, Berkeley with a degree in architecture in 1933, Samaniego returned to Los Angeles to start his practice. Throughout his 50-year career in Los Angeles, Samaniego designed a number of buildings, including a J.C. Penney, the Screen Actors Guild, and St. Anne Melkite Greek Catholic Church, as well as the existing Social Hall on the Project Site. Edward Samaniego died in 1999.

(c) Previous Evaluations

As discussed in the Historical Report, none of the buildings on the Project Site have been individually designated as historical resources under any local, state, or federal registration program. In addition, the Project Site is not located within a designated National Register or California Register historic district or Los Angeles HPOZ. However, the cathedral was identified as an eligible historical resource in the Los Angeles County Metropolitan Transportation Authority's (Metro's) *Westside Subway Extension Historic*

*Property Survey Report (Survey Report).*²⁷ The Survey Report found that the cathedral appeared to be eligible for listing in the National Register and California Register under Criterion C/3 for embodying distinctive characteristics of the Spanish Colonial Revival style with Italian Renaissance Revival elements. The findings in the Survey Report were reiterated in the 333 La Cienega Boulevard Project Initial Study, indicating the cathedral building was a historical resource under CEQA. Notably, however, the results of the Metro's Survey Report do not appear to have been reviewed or given consensus by OHP, and the status codes assigned to the Survey Report do not appear in the California Historic Resources Inventory System. As a result, the eligibility determination in the report does not appear to have any authoritative value.

In addition, the building was not documented as an eligible historical resource as a part of the Los Angeles Citywide Survey (SurveyLA) or the Wilshire Community Plan. In accordance with SurveyLA methodology, only resources that appeared to be eligible to surveyors under federal, State, and/or local criteria were documented. Lack of documentation on the building indicates surveyors did not find the building to be eligible under any criteria.

Because the results of Metro's study were never reviewed or given consensus by the OHP, all buildings on the Project Site were re-evaluated for eligibility against national, State, and local criteria as a part of the Historical Report. In addition, the Historical Report determined whether any of the other existing buildings on the Project Site qualified as a potential historical resource.

(d) Adjacent Historical Resources

As determined in the Historical Report, no buildings immediately adjacent to the Project Site qualify as historical resources.

(2) Archaeological Resources

The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. In addition, as provided in Appendix D to this Draft EIR, the results of the archaeological records search conducted by the South Central Coastal Information Center (SCCIC) indicate that there are no identified archaeological sites within the Project Site or within a 0.5-mile radius of the Project Site.

²⁷ *Metro, Westside Subway Extension, Historic Property Survey Report, August 2010.*

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines 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 an historical resource pursuant to §15064.5?

Threshold (b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Threshold (c): Disturb any human remains, including those interred outside of formal cemeteries?

For this analysis, the Appendix G significance thresholds listed above are relied upon.

b. Methodology

The Historical Report in Appendix C to this Draft EIR is based, in part, on historic permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, primary and secondary historical accounts, as well as review of the National Register and its annual updates, the California Register, and the City's Cultural Heritage Ordinance to identify any previously recorded properties within or near the Project Site. Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historical resource or resources, and if so; (2) a determination of whether the Project would result in a "substantial adverse change" in the significance of the historical resource or resources.

To address potential impacts associated with archaeological resources, formal records searches were conducted to assess the archaeological sensitivity of the Project Site and vicinity. In addition, an evaluation of existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources during Project construction.

c. Project Design Features

The following Project Design Feature is proposed with respect to cultural resources:

CUL-PDF-1: A Cathedral Deconstruction, Reassembly, and Rehabilitation Plan prepared by a qualified historic consultant will be submitted to the Department of City Planning. The plan will address the deconstruction, temporary relocation, reassembly, and rehabilitation of the cathedral building. The plan will be supported by an analysis of the building's structure and architectural drawings.

d. Analysis of Project Impacts

Threshold (a): Would the Project cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5?

(1) Impact Analysis

(a) Evaluation of Historical Significance

(i) Cathedral

National Register and California Register

The following considers the cathedral for eligibility for listing in the National Register, California Register, and as an HCM:

- Criterion A/1 (Associated with events that have made a significant contribution to the broad patterns of American history): According to the Historical Report, as a result of the City's population growth in the 1920s, a number of religious institutions were established throughout the City. By the mid-1920s, the Catholic Church had become one of the most prominent religious institutions in Los Angeles. The cathedral, which was constructed in 1937, is associated with Mt. Lebanon, a congregation with cultural ties to the early settlement of Maronite immigrants in Los Angeles. Mt. Lebanon, established in 1923 in an existing single-family residence in Boyle Heights, was the first Maronite congregation founded in the City and served Maronite immigrants. Due to the increasing membership, a new building containing a cathedral, rectory, and social hall was dedicated at the location of the church's founding. In 1966, the congregation purchased the Project Site. Although the Project Site has been associated with the congregation since 1966, Mt. Lebanon's historical significance related to the early settlement of the Maronite immigrants in the City is better reflected through its original location in Boyle Heights. As such, the cathedral is not eligible under Criterion A/1.
- Criterion B/2 (Associated with the lives of significant persons in history): Prior to Mt. Lebanon acquiring the Project Site, it was occupied by St. Peter's Parish. According to the Historical Report, parishioners of either congregation were not significant to the history of the City, state, or nation in a way that it is directly associated with the cathedral. Furthermore, although the leaders of the parish

were significant to the history of the congregation, they were not particularly significant to the history of the City, State, or nation. As such, the cathedral is not eligible under Criterion B/2.

- Criterion C/3 (Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master, or possesses high artistic values): Constructed in 1937, the cathedral incorporates a Spanish Colonial Revival style with elements of Italian Renaissance Revival. Designed by Ross Montgomery, a local architect well known for his designs in the 1920s and 1930s, the cathedral embodies several character-defining features related to its architectural significance and association with Ross Montgomery. The cathedral's exterior character-defining features include, but are not limited to, its prominent corner location, stucco cladding, pedimented window opening, concrete grilles, and clay tile roofing. Interior character-defining features include, but are not limited to, the large open rectangular volume, smooth plaster finishes, and half-circle-shaped capitals along the side of the aisles. However, as previously discussed, the cathedral has endured a series of alterations that have diminished its integrity in a way that it is no longer among the more notable or intact representation of Montgomery's work. As such, its integrity has been compromised to the extent that it is no longer eligible under Criterion C/3.
- Criterion D/4 (Has yielded, or may be likely to yield, information important in history or prehistory): Prior to the construction of the cathedral, the Project Site was subdivided and prepared for development. In addition, the Project Site has been subject to grading and possesses no known archaeological resources. Therefore, making the likelihood of its ability to yield information important in prehistory or history is minimal. Therefore, the Project Site is not eligible under Criterion D/4.

Los Angeles HCM

The cathedral appears to be individually eligible for local listing as a Los Angeles HCM due to the distinctive characteristics of the Spanish Colonial Revival style and Italian Renaissance Revival elements it embodies and its association with Ross Montgomery, a noted Los Angeles architect, who made an impact on the overall architectural environment of Los Angeles through his ecclesiastical designs. As discussed in the Historical Report, the cathedral's building clay tile roof, hand-troweled stucco cladding, and decorative precast concrete grilles are distinct characteristics of the Spanish Colonial Revival style, while its symmetrical primary façade and classical details, including the pilasters and pedimented window, exemplify Italian Renaissance elements.

The following include the cathedral's exterior and interior character-defining features related to its architectural significance and association with Ross Montgomery:

- Exterior

- Prominent corner location at the intersection of San Vicente Boulevard and Burton Way, oriented toward the southeast, so that it faces both major streets as they intersect;
 - Simple rectangular massing with lower wings flanking the main central volume;
 - Low-pitched, front-facing gable roof with clay tile roofing (although the existing clay tile dates to the 1990s renovation of the building);
 - Appearance of smooth, hand-troweled stucco cladding;
 - Symmetrical primary (south) façade;
 - Central arch bounded by four pilasters supporting an entablature at the primary façade;
 - Recessed primary entrance below the arched arrangement;
 - Pedimented window opening above the primary entrance;
 - Projecting stoop with shed roof and recessed entry at the side (east) façade;
 - Paired wood paneled doors with single rectangular lights on the south and east façades; and
 - Decorative precast concrete grilles along the roofline.
- Interior
 - Large open rectangular volume;
 - Open wood truss ceiling with painted/stenciled sheathing;
 - Appearance of smooth plaster finishes;
 - Nave flanked by smaller aisles on either side; and
 - Arcade of columns with half-circle-shaped capitals demarcating the side aisles from the nave.

As concluded in the Historical Report, the cathedral has undergone a series of alterations that have, over time, diminished its integrity in such a way that has made it ineligible for listing in the National Register and California Register. However, the integrity thresholds are somewhat lower for local listing than they are for federal and state listing. Based on this lower integrity threshold, the Historical Report concluded that, the cathedral does appear to retain sufficient integrity related to its embodiment of Spanish Colonial Revival and Italian Renaissance Revival ecclesiastical design by an influential local

architect to be eligible for local listing as an HCM. This conclusion reflects a conservative approach due in part to the fact that the building was previously identified as eligible under federal, State, and local criteria in a Section 106 historic resource survey (although it appears the survey findings were never given consensus by OHP). It is recognized that other historic preservation professionals could reasonably reach a different conclusion, based on the apparent lack of survey consensus and/or the prior alterations to the building that have impacted its integrity, and conclude that the cathedral building does not currently qualify for designation as an HCM under this local criterion. A supporting evaluation of the cathedral's integrity is provided below.

Integrity

For a property to be eligible for designation at the national, state, or local level, it must meet at least one eligibility criterion listed above, as well as retain sufficient integrity to convey that historic significance. Integrity is defined as physical and visual characteristics of a property necessary to convey its significance. The seven aspects of integrity identified by the National Park Service are *Location, Design, Setting, Materials, Workmanship, Feeling, and Association*. To satisfy the integrity requirement, a property must retain at least a majority of the seven aspects of integrity. The following is an evaluation of the cathedral under the seven aspects of integrity:

- *Location*: The cathedral retains integrity of location as it remains on its original site.
- *Design*: The cathedral has undergone several alterations to its exterior and interior design that postdate its period of significance of 1937, including:
 - The construction of two rounded bays flanking the main entrance, which have changed the appearance of its primary façade;
 - a rear addition;
 - the addition of an access ramp at the side entrance;
 - the replacement of all primary windows with steel windows with leaded, stained glazing; and
 - interior remodeling.

These alterations, in particular the addition of the rounded bays at the primary façade and the replacement of original windows with stained, leaded glass windows, have changed the austere appearance of the cathedral as designed by its architect in the late-1930s. Therefore, the cathedral's overall style is still discernable through its intact form, massing, and major elements, but its integrity of design has been diminished by alterations listed above.

- *Setting*: Since the construction of the cathedral, several buildings have been added to the campus. Furthermore, several large commercial and residential uses have been constructed in the surrounding area. Due to the significant development in the vicinity of the Project Site, as well as on the site itself, the cathedral building no longer retains integrity of setting from its period of significance of 1937.
- *Materials*: The cathedral has lost some original materials dating to its period of significance, including all of its primary original windows and interior flooring and lighting. Furthermore, new materials, such as steel windows with stained glass (the original windows contained clear glazing), interior marble cladding, chandeliers, and painted murals, have been added to the building. Thus, although it retains its primary exterior materials, including stucco wall finishes, and cast stone façade details, its loss of all primary windows and the addition of more decorative materials have diminished the cathedral's integrity of materials.
- *Workmanship*: Alterations to the building in the early 1970s, 1980s, and mid-1990s have affected its ability to convey the typical workmanship of its period. In particular, the installation of new stained glass windows and addition of new interior elements, such as changes to the altar and tabernacle and installation of new chandeliers and pendant lighting, have partially eroded the physical evidence of its 1930s craftsmanship. Therefore, this aspect of its integrity is diminished.
- *Feeling*: A historic property's integrity of feeling results from the presence of physical features that, taken together, enhance the property's historic character. Changes to the cathedral's immediate setting, combined with the modification and addition of design and material elements to its exterior and interior, have diminished its ability to evoke the aesthetic and historic sense of its period.
- *Association*: Because the cathedral is not significant for its association with an important person or event, integrity of association is not applicable.

Although the cathedral retains the integrity of location, due to the extensive exterior and interior alterations, the cathedral's integrity of design, materials, workmanship, and feeling have been diminished. As such, the cathedral's overall integrity has been diminished to the extent that it does not retain sufficient integrity under Criterion C/3, the only National Register/California Register criterion under which the cathedral is eligible for, as outlined above. However, the cathedral does retain sufficient integrity to convey its significance under local criteria as a potential Los Angeles HCM. As discussed in the Historical Report, the City's Cultural Heritage Ordinance does not include language regarding integrity. However, in practice, the City utilizes the National Register's seven aspects of integrity to weigh a resource's integrity and has shown greater flexibility when evaluating integrity for local designation as an HCM than is the case for determining state or federal eligibility. While the cathedral has undergone some alterations, a sufficient

degree of its integrity of design, workmanship, materials, and feeling remains to convey the distinguishing characteristics of the Spanish Colonial Revival and Italian Renaissance Revival styles and represents the work of noted Los Angeles architect Ross Montgomery. As such, the cathedral building appears to retain sufficient integrity for potential listing as a Los Angeles HCM.

Conclusion

Given the series of alterations to the cathedral, the building no longer retains sufficient integrity to be eligible for listing in the National Register or California Register. However, the cathedral does appear individually eligible for local listing as a Los Angeles HCM.

(ii) Rectory

The following considers the rectory for eligibility for listing in the National Register, California Register, and as an HCM:

Nation Register and California Register

- Criterion A/1 (Associated with events that have made a significant contribution to the broad patterns of American history): The rectory is not associated with events that have made a significant contribution to the broad patterns of our history. Constructed in 1939 to 1940, during a time when the Catholic Church's expansion program and general institutional growth had slowed in the City. Although the rectory is associated with Mt. Lebanon, the congregation's original rectory in Boyle Heights better reflects the historic significance for its association with the early settlement of Maronite immigrants in the areas. As such, the rectory is not eligible under Criterion A/1.
- Criterion B/2 (Associated with the lives of significant persons in history): The rectory was originally occupied by Reverend Michael A. Lee of St. Peter's Catholic Church. Clergymen of St. Peter's continued to occupy the building until 1966, the year Mt. Lebanon acquired the property. The prior clergy of either parish were not significant to the history of the City, State, or nation. As such, the rectory is not eligible under Criterion B/2.
- Criterion C/3 (Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master, or possesses high artistic values): The rectory, designed by Thomas Franklin Power, is a modest example of a Mediterranean Revival-style building. However, it does not embody the distinctive characteristics that set it apart from other buildings of the period. Moreover, it is not the best representation of Power's work as an ecclesiastical architect who designed multiple more distinguished religious buildings in Southern California. As such, the rectory is not eligible under Criterion C/3.

- Criterion D/4 (Has yielded, or may be likely to yield, information important in history or prehistory): Prior to the construction of the rectory, the Project Site was subdivided and prepared for development. Since the Project Site had been previously subject to grading and possesses no archaeological resources, it cannot be reasonably expected to yield information important in prehistory or history. Therefore, it is not eligible under Criterion D/4.

Los Angeles HCM

For the same reasons stated above in the evaluation of significance against National Register and California Register criteria, the rectory is not individually eligible for listing as a Los Angeles HCM. The cultural, economic, or social history of the nation, state, or community is not reflected or embodied in the rectory. In addition, the rectory is not specifically associated with important events or persons significant to the City's history. Furthermore, the rectory does not exemplify the distinctive characteristics of a type, period, style, or method of construction. Although the building was designed by noted architect Thomas Franklin Power, the rectory is not recognized as one of his most notable works.

Conclusion

Based on the above, the rectory is not individually eligible for listing in the National Register, the California Register, or as a Los Angeles HCM.

(iii) Social Hall

The following considers the social hall for eligibility for listing in the National Register, California Register, and as an HCM:

Nation Register and California Register

- Criterion A/1 (Associated with events that have made a significant contribution to the broad patterns of American history): The social hall, constructed in 1969, was built more than 30 years after the construction of the cathedral and rectory. As such, the social hall is not associated with the original development of the property by St. Peter's Catholic Church or the westward expansion of institutional resources in the City. Furthermore, the building did not have a direct association with the Catholic Church since the social hall was one of the several institutional buildings constructed during the postwar period, the period the Los Angeles' Catholic population increased by over 250 percent. Lastly, although the social hall is associated with Mt. Lebanon, the congregation's original social hall in Boyle Heights better reflects its historic significance for its association with the early settlement of Syrian and Lebanese immigrants in the city. As such, the social hall is not eligible under Criterion A/1.

- Criterion B/2 (Associated with the lives of significant persons in history): The social hall was constructed by Mt. Lebanon to hold social events and gatherings for its parishioners. Research did not indicate that members of the parish were significant to the history of the City, State, or nation in a way that is directly associated with the social hall. Therefore, the social hall is not eligible under Criterion B/2.
- Criterion C/3 (Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master, or possesses high artistic values): Constructed in 1969 and designed by Edward Jose Samaniego, the social hall is an excellent example of New Formalism. However, the building does not embody the distinctive characteristics of the type, period, or method of construction. Moreover, it does not possess high artistic value. Therefore the social hall is not eligible under Criterion C/3.
- Criterion D/4 (Has yielded, or may be likely to yield, information important in history or prehistory): Prior to the construction of the cathedral, rectory, and social hall, the Project Site had been previously subdivided and prepared for development. In addition, the Project Site has been subject to grading and possesses no known archaeological resources. Therefore, likelihood of its ability to yield information important in prehistory or history is minimal and the social hall is not eligible under Criterion D/4.

Los Angeles HCM

For the same reasons stated above in the evaluation of significance against National Register and California Register criteria, the rectory is not individually eligible for listing as a Los Angeles HCM. The cultural, economic, or social history of the nation, state, or community is not reflected or embodied in the social hall. In addition, the building is not specifically associated with important events or persons significant to the City's history. Furthermore, the social hall does not exemplify the distinctive characteristics of a type, period, style, or method of construction. Although the social hall was designed by local architect Eduardo Jose Samaniego, Samaniego's work did not rise to a level of master. As such, the social hall does not hold high artistic value.

Conclusion

Based on the above, the social hall is not individually eligible for listing in the National Register, the California Register, or as an HCM.

(iv) Historic District

The Project Site does not appear to be eligible for listing as a historic district in the National Register or California Register. Due to disparate architectural styles and the extended period of development, the Project Site lacks the historic, architectural, cultural,

and aesthetic cohesion necessary in order to be eligible for listing as a historic district. In addition, the Project Site does not qualify as a contributor to a potential HPOZ due to the reasons described above and the lack of development pattern and style represented in the surrounding buildings.

(b) Direct Impacts

A stated goal of the Project is the retention of the cathedral and its integration into the rest of the mixed-use development. The potential retention of the cathedral on the Project Site during construction of the overall project has been studied and determined to be physically infeasible due to (1) the need for substantial property-wide excavation and (2) the risk that the building could be significantly damaged during the excavation and construction process. Therefore, in order to accommodate the excavation and construction activities required for the subterranean parking structure, the cathedral would be carefully deconstructed and temporarily stored at an offsite location, in accordance with the guidelines set forth in the Cathedral Deconstruction, Reassembly and Rehabilitation Plan prepared by ARG pursuant to Project Design Feature CUL-PDF-1 and included as Appendix A to the Historical Report. Upon completion of the subterranean parking and the partial construction of the residential tower and new church facilities, the cathedral would be reassembled in its approximate original location and rehabilitated, with limited alterations. As concluded in the Historical Report, the rehabilitated cathedral will retain all of its character-defining features and continue to be eligible for local listing as a Los Angeles HCM and the Project would not have a significant impact on historical resources. A detailed discussion of the Project's treatment of the cathedral's character defining features and its integrity upon completion is provided below.

(i) Character-Defining Features

During construction, the cathedral would be deconstructed and temporarily stored at an off-site location, in accordance with the guidelines set forth in the Cathedral Deconstruction, Reassembly and Rehabilitation Plan prepared pursuant to Project Design Feature CUL-PDF-1 and attached as Appendix A to the Historical Report, so that excavation and construction of the subterranean parking structure, residential tower, and new church facilities can occur on the Project Site. Specifically, as discussed in the Historical Report, during disassembly, the cathedral's roof structure, including the painted/stenciled ceiling, trusses and purlins, exterior doors and frames, and original decorative features, such as the columns, trim, moldings, and surrounds that precast concrete vent/grilles, would be photo-documented, numbered, and indexed so that all components can be reassembled in their exact original configuration and historic paint palette of the cathedral building would be restored, based on forensic evidence of original painted finishes. Non-original decorative wall finishes, such as the murals at the altar, would not be documented or replicated. Exterior and interior original wood-frame walls and finished would be discarded and reconstructed. Exterior stucco and interior plaster

samples would be salvaged so that stucco and plaster can be replicated to match the original in color, texture, and composition. New clay tile roofing would be installed and would match the historic roofing based on documentation (existing clay tile roof materials date to the 1990s and will not be salvaged). The existing building systems, including mechanical units and ductwork, electrical panels and wiring, plumbing conduits and fixtures, would not be salvaged during disassembly. The cathedral would include all new code-compliant building systems as part of the reassembly process, as well as building-wide fire suppression systems and improved acoustical performance, including a full audio/visual system.

Upon completion of the subterranean parking structure and partial construction of the residential and new church buildings, the cathedral would be reassembled in its approximate original location (moved forward approximately two feet) and rehabilitated with limited alterations. The building's original form, massing, roof pitch, fenestration pattern, and decorative cast stone features would be restored, as would its large open interior volume and general configuration of interior spaces. In addition, the statue of Jesus would be reinstalled in the front of the cathedral approximately in its original location.

As discussed in Section II, Project Description, of this Draft EIR, some modifications to the floor plan would be implemented as part of the Project. These include Americans with Disabilities Act (ADA) compliant aisles and access ramps, additional accessible restrooms, and an expanded crying room. Specifically, each of the side aisles flanking the nave²⁸ would be widened by 18 inches, and secondary spaces at the north and south ends of the building (children's crying room, restrooms, confessional/confessor rooms, and sacristies²⁹) would be reconfigured. The overall length of the building would increase by approximately eight feet towards the rear of the property to accommodate a larger vestibule and chancel³⁰. The nave, the most significant, intact primary interior space, would retain the same dimensions as it does currently, and its relationship to the entry vestibule, chancel, side aisles, and secondary spaces would not change.

Upon reassembly, two additions would be appended to the rear façade, and the north end of the side façade, of the cathedral to accommodate an expanded chancel and ramp up to the chancel, respectively. The proposed additions would be modest in size, simple in design, and constructed of similar materials (stucco cladding, clay tile roofing) as the historic building. The rear and side additions would serve as a visual transition

²⁸ *A nave is the central part of a Christian Church designed for the public observance of the Mass.*

²⁹ *A sacristy is a room in a church where sacred vessels and vestments are kept.*

³⁰ *A chancel is the area around the altar generally used by the clergy and choir during worship.*

between the historic building and the more contemporary, flat roofed portions of the new development.

As part of its reassembly, the non-historic rounded bay additions currently present on either side of the main entrance volume would not be recreated. Rather, the original articulation of the primary façade would be restored—side wing walls would be set back from the primary entrance volume, as they were historically, and two windows (one circular and one rectangular), originally located on either side of the main entrance, would be reconstructed based on historic documentation. A small, non-historic side chapel at the west façade of the building would also be removed and the original configuration of that elevation would be restored. In addition, the historic paint palette of the cathedral building would be restored, based on forensic evidence of original painted finishes. Also, the non-historic social hall would be removed as part of the Project, and a new courtyard will be constructed in its place along the south edge of the property, reestablishing historic views of the west elevation of the cathedral building from Burton Way.

(ii) Integrity

As discussed above, the seven aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. As discussed below, based on a review of all Project plans and other documents, the Historical Report concluded that the Project would not significantly impact the cathedral building's integrity of location, and it would not further materially compromise the building's integrity of design, setting, materials, workmanship, or feeling, which have previously been diminished due to previous alterations made in the 1970s, 1980s, and mid-1990s. Therefore, the development of the Project would not materially impair the cathedral building because it would retain sufficient integrity to convey its historic significance and would remain eligible for designation as an HCM.

Location

As part of the Project, the cathedral would be shifted two feet to the south of its historic location, towards the southeast corner of the property, when reassembled. However, it would remain on the same parcel and retain its historic orientation towards San Vicente Boulevard and Burton Way, as well as its relationship to the rest of the Project Site. Therefore, the cathedral building would retain integrity of location under the Project.

Design

Upon reassembly and rehabilitation, the cathedral's historic form, massing, fenestration pattern, and major stylistic elements, including its cast stone ornamentation at the primary entrance and the historic appearance of its smooth stucco cladding would be retained or restored.

Though some changes would be made to its design, including the slight widening of the side aisles flanking the nave and the reconfiguration of secondary spaces at the north and south ends, the building's original floor plan had previously been compromised through changes to secondary spaces. Therefore, these additional alterations to the floor plan would not materially further diminish its current integrity of design. Furthermore, the building's most significant interior space, the nave, and its original dimensions and design elements (painted stenciled sheathing, exposed trusses, arcade with capitals) would be restored upon reassembly.

In addition, the reassembly of the cathedral building includes the restoration of missing historic design elements, such as restoration of the original configuration and fenestration pattern of its primary façade through the removal of non-historic rounded bays on either side of the entrance. The original configuration of the west façade would also be restored through the removal of a non-historic side chapel.

For these reasons, the Project would not further materially compromise the cathedral building's integrity of design; in some ways, it would improve its current design integrity through removal of non-original features on its primary (south) and west façades.

Setting

The Project would result in changes to the cathedral building's current setting. The Project includes an additional 23,649 square feet of ancillary church uses (including offices, meeting rooms, and a multi-purpose room) that would connect the cathedral to the residential tower at the west end of the Site. This volume would be three stories in height (no more than 42 feet) and would provide an appropriate height transition between the cathedral (25 feet, 6 inches) and the residential tower (225 feet). The new ancillary church building would be located toward the rear of the cathedral, connected to its rear façade at the northeast portion of the Project Site, and extend west to connect to the base of the residential tower. The cathedral's three primary façades would still be visible as they were historically, facing a new courtyard and Burton Way to the southwest, the intersection of Burton Way and San Vicente Boulevard to the southeast, and San Vicente Boulevard to the northeast. Historic views of the west elevation of the building will be restored through the removal of a non-historic social hall and construction of an open courtyard in its place along the south edge of the property.

The proposed 19-story residential building is situated on the Project Site in such a way that it would be separated from the cathedral by a series of new smaller volumes that would be compatible with the scale, proportions, and design of the historic building. Furthermore, the cathedral is currently surrounded by much larger buildings along San Vicente Boulevard and Burton Way (including an 11-story condominium building directly to the north and across the alley).

For these reasons, the construction of the residential tower and new ancillary church building on the Site would not further materially diminish the cathedral's integrity of setting.

Materials

The building would lose some original materials during deconstruction and reassembly, including interior wall framing, roof underlayment, and its concrete foundation, none of which are visible to the public or considered to be character-defining. The vast majority of its distinguishing materials would be salvaged and restored.

During disassembly, character-defining features and materials would be photo-documented, numbered, indexed, and stored offsite during excavation so that they can be reassembled in their original configuration. This treatment would include its original cast stone ornamentation at the primary entrance, wood doors, wood roof trusses and purlins, decorative cast stone vents/grilles, and distinctive interior features and finishes such as cast stone capitals and painted wood roof sheathing.

As part of the deconstruction and reassembly process, existing exterior stucco and interior plaster finishes will need to be removed and recreated to ensure adequate waterproofing of the building envelope. Exterior stucco and interior plaster are common materials that are easily patched and recreated in kind. For example, in many places the cathedral's original exterior and interior finishes have already been patched and recreated in the repair of fire damage and other modifications. As part of the building's reassembly, using retained original samples, exterior stucco and interior plaster would be recreated to match the color and texture of the original stucco/plaster using the same hand application techniques as were used originally. Therefore, although the building's original exterior stucco and interior plaster finishes would need to be recreated, they would match the historic finishes exactly and their distinctive appearance would be preserved.

Therefore, although some original materials would be lost, the cathedral's character-defining features and materials would be retained and the Project would not further materially diminish the building's integrity of materials.

Workmanship

Nearly all of the building's extant character-defining features and materials that represent the physical evidence of its original craftsmanship would be retained under the Project. Though the cathedral's original stucco/plaster wall finishes would need to be recreated to ensure adequate waterproofing of the building's envelope, as discussed above under "materials," they would be recreated using the same hand application techniques used by artisans during its original 1937 construction, preserving the physical appearance of its original workmanship.

What evidence remains of its original craftsmanship would be retained. Therefore, the Project would not further materially compromise integrity of workmanship.

Feeling

The Project would not further compromise the building's current integrity of setting and design, and extant character-defining features and materials would be retained. Therefore, the cathedral would continue to evoke the aesthetic and historic sense of its period that it does currently and its integrity of feeling would not be further diminished by the Project.

Association

Because the cathedral is not significant for its association with an important person or event, integrity of association is not applicable.

(iii) Conclusion

Although some original materials would be lost in the deconstruction and reassembly of the cathedral building, its overall design and all of its extant character-defining features would be retained. Furthermore, historic elements of its original design would be restored through the removal of past alterations (i.e., the rounded bays flanking the primary entrance and side chapel at the west façade) in its reassembly, and historic views of the building would be restored through the removal of a non-historic social hall building immediately adjacent to (west of) the cathedral and construction of an open courtyard in its place along the south edge of the property. The cathedral building would continue to embody the distinctive characteristics of a 1930s Spanish Colonial Revival church designed by noted Los Angeles architect Ross Montgomery.

Because the building would remain eligible for listing as a Los Angeles HCM under Criterion 3 upon completion of the Project, the significance of the historical resource would not be materially impaired and the Project would not result in a substantial adverse change in the historic significance of the cathedral. This is the case regardless of whether the deconstruction, rehabilitation, and limited alteration of the cathedral building fully complies with the applicable Secretary of the Interior's Standards described in Section 2.a(1)(b), above. Therefore, the Project would not have a significant direct impact on historical resources.

(c) Indirect Impacts

As discussed in the Historical Report, a records search was prepared for a mixed-use project at 333 South La Cienega Boulevard, east of the Project Site, in 2015. The records search included a review of all previously recorded cultural resources within a

0.5-mile radius of the proposed development. Based on the records search prepared for the 333 La Cienega Boulevard Project, 48 resources were identified within 0.5 mile of the Project Site; however, the cathedral was the only resource that had been previously identified within 0.25 mile of the 333 La Cienega Boulevard site. Therefore, since there are no historical resources in the immediate vicinity of the Project Site, the Project would not result in significant indirect impacts to adjacent historical resources.

(d) Conclusion

Based on the above, the Project would not adversely affect the significance of the cathedral. Although the deconstruction and reassembly of the cathedral would impact the building's integrity of design, workmanship, materials, and feeling, these aspects of integrity have already been diminished by previous alterations. As such, the Project would not further materially impair the cathedral's integrity in a way that would make it no longer eligible for listing as a Los Angeles HCM. Furthermore, as discussed above, there are no historical resources in the immediate vicinity of the Project Site. **As such, the Project would not cause a substantial adverse change in the significance of an historical resource, and the Project's impact on historical resources would be less than significant.**

(2) Mitigation Measures

Project-level impacts to historical resources would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts to historical resources were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.

Threshold (b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for this Project, included in Appendix A to this Draft EIR, based on a records search conducted by SCCIC indicate there are no identified archaeological sites within the Project Site or within 0.5 mile of the Project Site. Nevertheless, the Project would require grading of the Project Site and excavations to approximately 72.5 feet below grade for the subterranean parking structure. Thus, previously unknown archaeological resources could potentially be encountered. Pursuant to the City's Condition of Approval for an Inadvertent Discovery, in the event that any

subsurface archaeological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At that time the Applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in PRC 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. **Therefore, as determined in the Initial Study, the Project would not cause a substantial adverse change in the significance of an archaeological resource, and impacts with respect to Threshold (b) would be less than significant. No further analysis is required.**

Threshold (c): Disturb any human remains, including those interred outside of formal cemeteries?

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for this Project, included in Appendix A to this Draft EIR, no known traditional burial sites have been identified on the Project Site. In addition, given that the Project Site is located within an urbanized area and has been subject to previous grading, the likelihood that human remains of historical or prehistoric age are preserved within the Project Site is low. While the uncovering of human remains is not anticipated, if human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). **Therefore, as determined in the Initial Study, the Project would not disturb any human remains, and impacts with respect to Threshold (c) would be less than significant. No further analysis is required.**

d. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are a total of 44 related projects in the vicinity of the Project Site. Although impacts to historic resources tend to be site-specific, cumulative impacts would occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that

are significant within the same context as the Project. However, as discussed above, the Project would not result in direct or indirect impacts to historical resources. Specifically, the direct impact would be less than significant because the cathedral building would not be altered to the extent that it would no longer be eligible for listing as an HCM; and indirect impacts would be less than significant because there are no historical resources in the immediate vicinity. In addition, none of the other existing buildings that would be removed as part of the Project qualify as historical resources. Furthermore, the Project Site is not located within the boundaries of a historical district. **Therefore, the Project's impact on historical resources would not be cumulatively considerable, and the cumulative impact would be less than significant.**

(2) Mitigation Measures

Cumulative impacts to cultural resources would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts to cultural resources were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.