

Appendix C
**Historic Resources and Cultural
and Paleontological Resources
Assessment Report**

Appendix C-1
**Historic Resources Technical
Report**

1111 S. Hill Street
Los Angeles, California



MVE, 2021

Historical Resource Technical Report

Prepared by:

CONSULTING

G P A

May 2020
(Revised June 2021)



TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION	2
1.1 Purpose and Qualifications	2
1.2 Methodology.....	3
2. REGULATORY FRAMEWORK.....	6
2.1 National Register of Historic Places.....	6
2.2 California Register of Historical Resources.....	8
2.3 Los Angeles Cultural Heritage Ordinance.....	10
2.4 Los Angeles Historic Preservation Overlay Zone Ordinance	10
3. ENVIRONMENTAL SETTING	11
3.1 Description and History of Project Site.....	11
3.2 Historical Resources on the Project Site.....	15
3.3 Historical Resources in the Project Study Area.....	19
4. PROJECT IMPACTS.....	33
4.1 Determining the Significance of Impacts on Historical Resources	33
4.2 Project Description.....	33
4.3 Analysis of Project Impacts.....	34
5. CONCLUSIONS	40
6. SOURCES.....	41
APPENDIX A – Résumé	



EXECUTIVE SUMMARY

The purpose of this report is to analyze if a proposed project (the Project) in the Central City Community Plan Area of the City of Los Angeles would directly, indirectly, or cumulatively impact any historical resources subject to the California Environmental Quality Act (CEQA). The Project is located at 206-10 W. 11th Street and 1101-15 S. Hill Street (commonly known as 1111 S. Hill Street) and would involve one parcel (Assessor Parcel Number 5139-019-022). This parcel is located at the southwest corner of the intersection of 11th and Hill Streets (see Figure 1 below). The adjacent parcels to the south and west are surface parking lots. The Project site is currently developed with a two-story building constructed in 1954 for use as office space and paper storage. The Project would involve the demolition of the building and the construction of a new high rise commercial and residential building.

GPA Consulting (GPA) was retained to identify historical resources on and in the vicinity of the Project site, to assess any potential impacts the Project may have on the identified historical resources, and to recommend mitigation measures, as appropriate. As the Project would involve new construction, GPA established a study area to account for impacts on historical resources identified in the vicinity. The study area includes the Project site and parcels on all blocks sharing street frontage with the block containing the Project site (see Figure 2 below). The study area is bounded by W. Olympic Boulevard on the north, S. Broadway on the east, W. Pico Boulevard on the south, and S. Grand Street on the west.

The building on the Project site is not currently listed under national, state, or local landmark or historic district programs and is not included as significant in any historic resource surveys of the area; however, there are seven listed or potential historical resources in the study area. These include three designated City of Los Angeles Historic-Cultural Monuments and four properties that were identified as potential historical resources in the survey of the area completed by SurveyLA in 2016. Out of an abundance of caution, properties identified as eligible for federal, state, or local historic designation through the SurveyLA were presumed for the purposes of this analysis to be historical resources.

The threshold for determining significant impacts on historical resources in the State CEQA Guidelines is whether a proposed project would cause a substantial adverse change to a historical resource, which is defined as demolition, destruction, relocation, or alteration of the resource or its immediate vicinity such that the historical resource is materially impaired. As the Project site does not contain any historical resources, the Project would have no direct impacts on any historical resources. The indirect impacts the Project could have on the historical resources in the study area were also analyzed. The Project would have no indirect impacts on the identified historical resources. The new building would introduce a new visual element to the immediate surroundings of the historical resources in the study area; however, the Project would not result in any substantial adverse changes to the integrity of historical resources to the degree that they would no longer be eligible for listing as historical resources defined by CEQA. There would be no potential for cumulative impacts to historical resources of the same property type as the building demolished as a result of the Project is not a historical resource. Furthermore, the Project site is not located within the boundaries of a historic district. No historical resources would be materially impaired by the Project. No mitigation is required or recommended.

1. INTRODUCTION

1.1 Purpose and Qualifications

The purpose of this report is to analyze if a proposed project (the Project) in the Central City Community Plan Area of the City of Los Angeles would directly, indirectly, or cumulatively impact any historical resources subject to the California Environmental Quality Act (CEQA). The Project is located at 206-10 W. 11th Street and 1101-15 S. Hill Street (commonly known as 1111 S. Hill Street) and would involve one parcel (Assessor Parcel Number 5139-019-022) (Figure 1). This parcel is located at the southwest corner of the intersection of 11th and Hill Streets. The adjacent parcels to the south and west are surface parking lots. The Project site is currently developed with a two-story building constructed in 1954 for use as office space and paper storage. The Project would involve the demolition of the building and the construction of a new high rise commercial and residential building.



Figure 1: Project Site (ESRI)

GPA Consulting (GPA) was retained to identify historical resources on and in the vicinity of the Project site, to assess any potential impacts the Project may have on the identified historical resources, and to recommend mitigation measures, as warranted, for compliance with CEQA. Allison M. Lyons was responsible for the preparation of this report. She fulfills the qualifications for a historic preservation professional outlined in Title 36 of the Code of Federal Regulations, Part 61. Her qualifications are outlined in Appendix A, and her résumé is available upon request. Amanda Duane updated the report. She fulfills the qualifications for historic preservation professionals

outlined in Title 36 of the Code of Federal Regulations, Part 61. Her résumé is attached in Appendix A.

1.2 Methodology

To identify historical resources and assess potential Project impacts, GPA performed the following tasks:

1. Conducted a field inspection of the Project site and vicinity to determine the scope of the study. As the Project involves new construction, GPA established a study area to account for impacts on historical resources identified in the vicinity (see Figure 2). The study area includes the Project site and parcels on all blocks sharing street frontage with the block containing the Project site. The study area is bounded by W. Olympic Boulevard on the north, S. Broadway on the east, W. Pico Boulevard on the south, and S. Grand Street on the west. All buildings within the study area were photographed during field inspection.

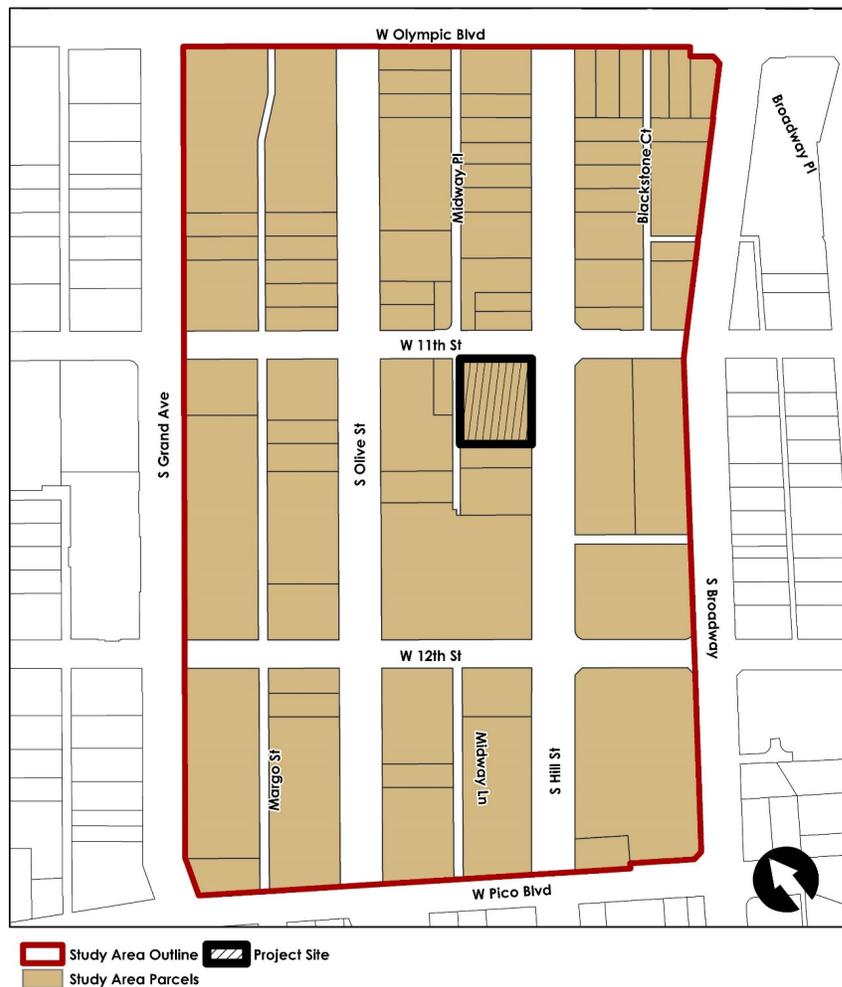


Figure 2: Study Area (GPA)

This study area was established to account for potential impacts on historical resources in the vicinity. Parcels beyond this study area were not included because the Project would



have no potential to directly, indirectly, or cumulatively impact the buildings on these distant parcels or their surrounding setting. The buildings and streets immediately surrounding the Project site create a geographic and visual separation between the parcels beyond the study area and the Project site. The Project site cannot be reasonably considered part of the environmental setting of historical resources beyond the study area due to this intervening space.

2. Requested a records search from the South Central Coastal Information Center to determine whether or not the Project site contains any properties that are currently listed under national, state, or local landmark or historic district programs and whether or not any properties have been previously identified or evaluated as potential historical resources. This involved a review of the California Historical Resources Inventory System (CHRIS), which includes data on properties listed and determined eligible for listing in the National Register of Historic Places, listed and determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resources surveys and other planning activities. The search results for the Project site revealed that it was within the study area of report completed by Leslie Rogers in 2013 for the Restoration of Historic Streetcar Service in Downtown Los Angeles. No resources on the Project site were identified or evaluated in this report.
3. Consulted the Los Angeles Historic Resources Inventory website, HistoricPlacesLA.org, to determine if any properties within the study area are designated Los Angeles Historic-Cultural Monuments or located within Historic Preservation Overlay Zones. Please see Section 3.3 for a description of historical resources in the study area.
4. Consulted the SurveyLA findings for the Central City Community Plan Area to determine if any properties within the study area were identified as potential historical resources. A description of these potential historical resources in the study area can be found in Section 3.3.
5. Assessed the general condition and physical integrity of the building on the Project site during the field inspection. Digital photographs of the building's exterior were also taken.
6. Conducted research on the history of the building on the Project site. Dates of construction and subsequent alterations were determined by the building permit record, as well as additional sources, such as the Los Angeles County Office of the Assessor records, newspaper articles, city directories, and historic maps.
7. Consulted the Context/Theme/Property Type (CTP) eligibility standards formulated for the *Los Angeles Citywide Historic Context Statement* to identify the appropriate CTPs under which to evaluate the building on the Project site.
8. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs to evaluate the significance and integrity of the property as a potential historical resource.



9. Reviewed and analyzed the plans and related documents dated March 10, 2020 and April 30, 2021 to determine if the Project would have an indirect or cumulative impact on the identified historical resources as defined by CEQA.

2. REGULATORY FRAMEWORK

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register of Historic Places (National Register). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.¹ The National Register, California Register, and local designation programs are discussed below.

2.1 National Register of Historic Places

The National Register is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”²

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:³

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- 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. Yield, or may be likely to yield, information important in prehistory or history.

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.”⁴ 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.

¹ Public Resources Code §5024.1 and 14 California Code of Regulations §4850 & §15064.5(a)(2).

² Title 36 Code of Federal Regulations Part 60.2.

³ Title 36 Code of Federal Regulations Part 60.4.

⁴ *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: National Park Service, Department of the Interior, 1997), 7-8.



Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as "the ability of a property to convey its significance."⁵ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."⁶

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.⁷ A district's significance and historic integrity should help determine the 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.⁸

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological 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

⁵ *National Register Bulletin #15*, 44-45.

⁶ *Ibid*, 5.

⁷ Title 36 Code of Federal Regulations Part 60.3(d).

⁸ *National Register Bulletin #21: Defining Boundaries for National Register Properties Form* (Washington D.C.: U.S. Department of the Interior, 1997), 12.



- It independently meets the criterion for listing in the National Register.⁹

2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹⁰

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹¹

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity,

⁹ *National Register Bulletin #16: How to Complete the National Register Registration Form* (Washington D.C.: U.S. Department of the Interior, 1997), 16.

¹⁰ Public Resources Code §5024.1 (a).

¹¹ Public Resources Code §5024.1 (d).



there is the expectation that properties reflect their appearance during their period of significance.¹²

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:¹³

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP in its *Instructions for Recording Historical Resources* provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). If a property is eligible for the California Register, but not the National Register, a "C" precedes the S, D, or B code. There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

¹² Public Resources Code §4852.

¹³ Public Resources Code §5024.1.



The specific Status Codes referred to in this report are as follows:

- 3S** Appears eligible for National Register as an individual property through survey evaluation.
- 3CS** Appears eligible for California Register as an individual property through survey evaluation.
- 5S1** Individual property that is listed or designated locally.
- 5S3** Appears to be individually eligible for local listing or designation through survey evaluation.

2.3 Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance¹⁴ in 1962 and amended it in 2018 (Ordinance No. 185472). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission comprises five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The three criteria for HCM designation are stated below:

1. 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 or community; or
2. The proposed HCM is associated with the lives of historic personages important to national, state or local history; or
3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

2.4 Los Angeles Historic Preservation Overlay Zone Ordinance

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (HPOZs) in 1979; Angelino Heights became Los Angeles' first HPOZ in 1983. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. According to Section 12.20.3 of the City of Los Angeles Municipal Code, the criteria for the designation of an HPOZ are:

1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
3. Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of a historic place or area of historic interest in the City.

¹⁴ Los Angeles Administrative Code §22.171 of Article 1, Chapter 9, Division 22.

3. ENVIRONMENTAL SETTING

3.1 Description and History of Project Site

Setting

The Project site is in the Central City Community Plan Area at the southwest corner of the block bounded by W. 11th Street to the north, Hill Street to the east, W. 12th Street to the south, and Olive Street to the west (see Figure 1 above). The topography of the area is generally flat. The block is in the limits of the Ord street grid, with the street grid oriented at an angle off the cardinal directions.

The Project site is located in an urban setting of varied development. Properties surrounding the Project site are developed with commercial, institutional, residential, and industrial buildings, as well as surface parking lots. Buildings range from low, mid, and higher-rise buildings constructed between the 1910s and 1950s to high-rise buildings constructed between the 1960s and 2010s. In the 2000s, the area to the south and west of the Project site became known as South Park and a considerable amount of infill has been constructed in the last decade (see page 38).

As a result of infill development and layered periods of development, the streets throughout South Park lack a sense of hierarchy and the built environment lacks cohesion. The street wall that often characterizes the main north-south thoroughfares of the historic core of Downtown north of the Project site is not present in the area immediately surrounding the Project site. In the study area, setbacks, primary entrances, and loading docks channel vehicular and pedestrian circulation away from north-south streets.



Figure 3: Project site, view facing west from Hill Street (GPA)

Project Site Building

The Project site is currently developed with a two-story building constructed in 1954 for use as office space and paper storage (see Figure 3, Figure 4, and Figure 7). The building is constructed of reinforced concrete and has a boxy massing that meets the property line at the curb of the southwest intersection of S. Hill Street and W. 11th Street. The north, east, and west elevations have stucco cladding with widely spaced vertical scoring across the middle of the street-facing elevations. The south elevation is painted board-formed concrete. The building has a flat parapet with an elevator penthouse at the southeast corner.

The main entrance is located in the first bay on the south side of the east elevation facing Hill Street. The double height entrance is framed by a stucco surround slightly recessed from the elevation. A flat stucco awning projects from mid-point of the surround. The roll-up metal entrance door is further recessed below the awning. The upper portion of the entrance, above the awning, is three windows with narrow hopper lower portions and fixed upper sash.



Figure 4: Project site, view facing southwest from Hill and 11th Street (GPA)

A secondary entrance is located on 11th Street. This entrance is recessed with paired, solid metal doors enclosed by a metal security gate flush with the elevation. The building also features garage bays on both street-facing elevations. A garage opening is located in the third bay from the south on the Hill Street (east) elevation. The garage appears to be boarded up and not operable. An additional garage bay is located in the first bay on the east side of the north elevation along 11th Street. This garage bay features a simple stucco surround with metal roll-up door.

Fenestration is limited to bands of clerestory windows across the north, east, and west elevations. At the Hill (east) and 11th (north) Street elevations, windows are set in a slightly canted stucco surround. The surround meets and continues across the elevations at the northeast corner. The windows are metal sash with four rectangular panes stacked lengthwise in groups of five columns. Each group of five is separated by stucco mullions. The Hill Street elevation is seven bays across and the 11th Street elevation is six bays. The west elevation is seven bays across. The windows on

the west elevation do not feature the canted surround. The south elevation is a board-form concrete wall with no fenestration.

The building is surrounded by surface parking lots on all sides. Mature Canary Island pines are planted at regular intervals along the sidewalk at Hill Street, east of the building.

History

Development on the Project site followed a typical pattern for the South Park area. The Project site was initially developed with single-family homes in the late nineteenth century. These homes were demolished or relocated when a one-story commercial building with five storefronts and a bookbinding building were constructed on the site in 1913 (see Sanborn map, Figure 5).¹⁵ The storefronts opened onto 11th Street and the bookbinding business opened onto Hill Street. The buildings were designed by the noted Los Angeles architecture firm Hunt & Burns. The buildings were altered often as tenants changed. The building on 11th Street was generally used for retail stores or restaurants for 50 years. The building on Hill Street became an insurance office. The buildings were demolished in 1954. At the time of demolition, the owner was Hearst Publications, the parent company of the *Los Angeles Herald-Examiner* newspaper.¹⁶ The newspaper's main building (Los Angeles Herald Examiner Building, 1111 S. Broadway, extant) and Press Building (1108 S. Hill Street, demolished) were located east of the Project site.

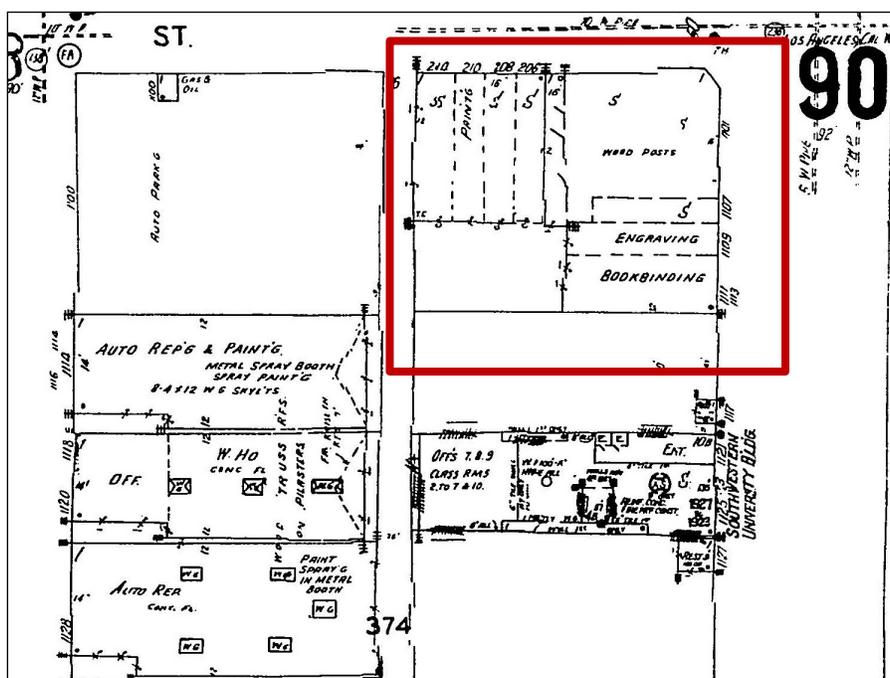


Figure 5: Sanborn map showing Project site outlined in red, the map was updated just prior to construction of the subject building. The map shows stores and buildings constructed on the Project site in 1913.

¹⁵ City of Los Angeles Department of Building and Safety, Building Permit No. 1913LA06654, May 14, 1913.

¹⁶ City of Los Angeles Department of Building and Safety, Building Permit No. 1954LA82138, March 12, 1954.

The current building on the Project site was constructed in 1954 and is associated with the address 1111 S. Hill Street. The building was designed by architect Raymond Raleigh Shaw (1890-1967) as a “publishing building office and paper storage.” The owner of the building at the time of construction was listed as the City Center Corporation, which was located more than five miles away at 3834 Wilshire Boulevard and does not appear to be associated with Hearst Publications.¹⁷ As originally designed, permit records indicate that the building was constructed with the potential for additional stories to be added later, though none were.¹⁸ The building permit noted that a tunnel connected the building below Hill Street “to the press room.”¹⁹ This tunnel was likely connected to the Press Building of the *Herald-Examiner*, located at 1108 S. Hill Street. Shaw was also responsible for an addition to the Press Building at the time the subject building was constructed.²⁰ At the time of construction, a parking lot associated with Southwestern University was located south of the building.²¹ The Southwestern University Building has since been demolished and replaced with a one-story commercial bank building (see Figure 6 and Figure 7).



Figure 6: Southwestern University, 1121 S. Hill Street, under construction c. 1930s. The Project site is in the lower right (see arrow). The Project site was developed with the current building in 1954. (Security Pacific National Bank Collection, LAPL)



Figure 7: Southern elevation of the Project site building, view facing west toward parking lot and bank building on former site of Southwestern University (GPA)

After construction, the first floor of the subject building was used primarily for printing and storage associated with the *Los Angeles Herald-Examiner* and by the Prudential Insurance Corporation on

¹⁷ City of Los Angeles Department of Building and Safety, Building Permit No. 1954LA83592, April 15, 1954.

¹⁸ City of Los Angeles Department of Building and Safety, Building Permit No. 1954LA85698, May 4, 1954.

¹⁹ Ibid.

²⁰ Historic Resources Group, Cultural Resources Technical Report: Proposed Herald-Examiner Project: Broadway, Hill Street & 12th Street Sites, Los Angeles, California (Los Angeles: October 2005 (Updated February 2006), 9-10.

²¹ Historical Aerials, 1111 S. Hill Street, 1948, accessed January 8, 2019, <https://www.historicaerials.com/viewer>.



the second floor. Partitions and ceilings were frequently reconfigured. Following the closure of the *Los Angeles Herald-Examiner* in 1989, the building was used as a warehouse.

3.2 Historical Resources on the Project Site

The building on the Project site at 1111 S. Hill Street is not currently listed as a landmark under national, state, or local programs and is not included as significant in any historic resource surveys of the area, including SurveyLA. As analyzed below using the established criteria and aspects of integrity, the building does not appear to meet the eligibility standards for any themes developed in the Los Angeles' Citywide Historic Context Statement(LACHCS)²² due to a lack of historic significance, architectural character, and physical integrity.

Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The context from the LACHCS considered under Criterion A is Public and Private Institutional Development, Newspapers and Publishing, 1850-1980.²³ The subject building was designed as office space and paper storage and was associated with the *Los Angeles Herald-Examiner* from the time of completion in 1954 until the newspaper ceased publication in 1989.

The *Los Angeles Herald-Examiner* was a daily newspaper founded as the *Examiner* by William Randolph Hearst in 1903. The *Examiner* was considered the liberal, pro-union newspaper of the city in contrast to the conservative and pro-business *Los Angeles Times*. After 1914, the *Examiner* was located at 1111 S. Broadway (Los Angeles Herald Examiner Building). Circulation grew with the explosion of Los Angeles' population after World War II. At the time of Hearst's death in 1951, Los Angeles had five daily newspapers: Hearst Corporation's *Examiner* and *Herald-Express*, the Times-Mirror Company's morning *Los Angeles Times* and evening *Mirror*, and the *Daily News*. The Hearst papers led in combined circulation. By the 1950s the *Examiner* was the largest afternoon daily in the nation. The paper was known for attention-grabbing headlines, muckraking exposes, sensational stories, color comics, and editorials.

The paper began a period of decline in the 1960s. In 1961, the *Examiner* and *Herald-Express* merged into a single afternoon publication, creating the *Los Angeles Herald-Examiner*. The competing newspaper, the *Los Angeles Times*, became the city's only morning paper at a time when afternoon papers were declining in importance as television became the preferred source of news in the evening. The decision to abandon the morning *Herald* was a strategic blunder for the publication. The *Herald-Examiner* was further affected by the Newspaper Guild's union strike from 1967 to 1973. Readership and advertising plummeted when the guild went on strike. Although management eventually settled, the paper never recovered its lost circulation or advertising. The *Herald-Examiner* shut down in 1989.²⁴

²² "Los Angeles' Citywide Historic Context," City of Los Angeles Office of Historic Resources, accessed January 2, 2019, <https://preservation.lacity.org/los-angeles-citywide-historic-context>.

²³ The Newspapers and Publishing, 1850-1980 theme is currently under development for the LACHCS.

²⁴ Leonard Pitt and Dale Pitt, *Los Angeles A to Z* (Berkeley, CA: University of California Press, 2000), 293-294.

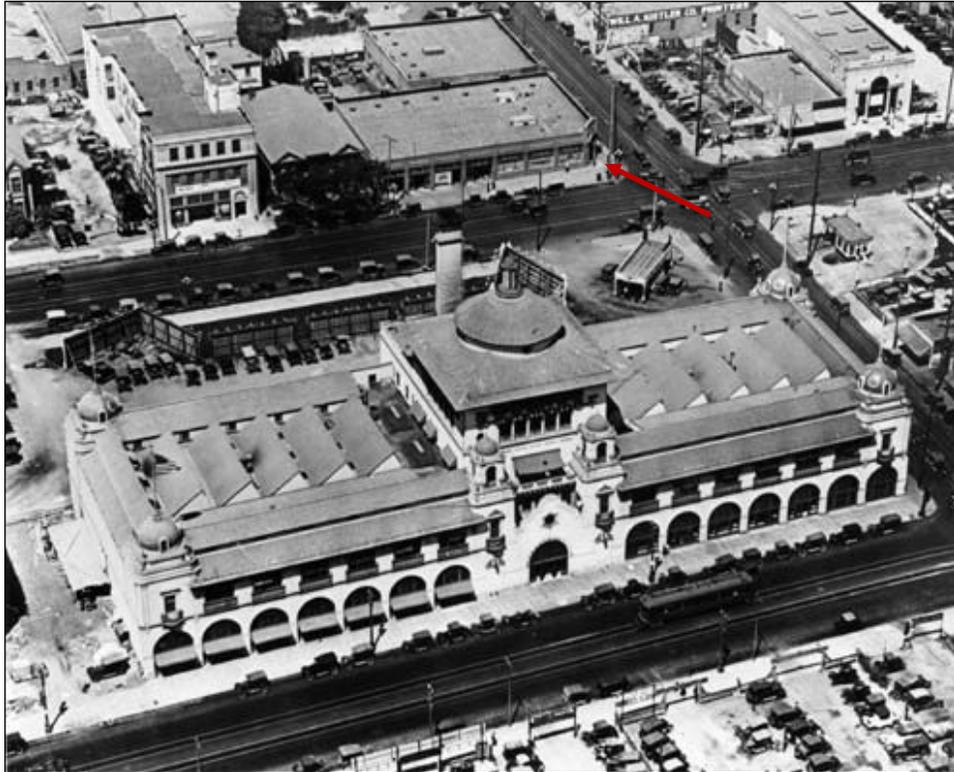


Figure 8: Los Angeles Herald Examiner Building, 1111 S. Broadway, aerial view facing west c. 1920s (Project site is in the upper center (see arrow) (Security Pacific National Bank Collection, LAPL)

At the time of construction, the subject building was one of three buildings in the area associated with the *Los Angeles Herald-Examiner*. The *Herald-Examiner* operations were concentrated in two buildings east of the Project site. The Los Angeles Herald Examiner Building, constructed between 1914 and 1915, was located at 1111 S. Broadway (extant, see Figure 8).²⁵ A second building associated with the publication, the Press Building, located directly across from the Project site on the east side of Hill Street, was constructed in c. 1948 (demolished in 2015).²⁶ A tunnel below Hill Street connected the subject building and the Press Building.

The subject building does not appear to be significantly associated with the *Herald-Examiner*. The building was constructed as a storage facility in 1954, at the end of a period of growth for the newspaper. The design of the building, with minimal fenestration and large garage openings, reflects its use as storage. While the need for storage was associated with the growth of the publication, paper storage is not significantly associated with the historical significance of the newspaper business or the *Herald-Examiner*. Research did not reveal that the building was the location of important decisions related to the growth of the publication or the development of

²⁵ The Los Angeles Herald Examiner Building was formally determined eligible for listing in the National Register of Historic Places by the Keeper of the National Register (evaluation code "2S1") on April 21, 1992 under Criterion B for its association with significant persons and communication as well as under Criterion C, for its architectural significance.

²⁶ A new, multifamily residential building has since been constructed on this parcel. City of Los Angeles Department of Building and Safety, Building Permit No. 14010-10000-01189, September 25, 2015.



newspapers and publications in the City of Los Angeles. Since the paper ceased publication in 1989, the building has been used as a warehouse.²⁷

Therefore, the building does not appear to be significant under Criterion A.

Criterion B

To be eligible for listing in the National Register under Criterion B, a property must be associated with the lives of persons significant in our past. William Randolph Hearst, the publisher of the *Los Angeles Examiner*, is a significant individual under the LACHCS context of Commercial Development, and the theme for Commercial Merchants, Builders and Leaders. The Los Angeles Herald Examiner Building at 1111 S. Broadway was formally determined eligible for listing in the National Register under Criterion B for its association with Hearst. He died in 1951, prior to the construction of the subject building. Thus, the subject building cannot be associated with Hearst. Though many individuals were affiliated with the *Los Angeles Herald* and *Herald-Examiner*, research did not reveal that the newspaper, other tenants, or functions of the subject building were significantly associated with the lives of individual historic personages important to national, state, or local history. Criterion B is only applicable to the achievements of individuals, not groups of persons. Collaborative contributions are typically best evaluated under Criterion A. Therefore, the building does not appear to be associated with the lives of significant individuals and does not appear to be significant under Criterion B.

Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

The building was completed in 1954 in a Modern style absent of design features articulating a particular style within the Modern movement. No relevant architectural style theme in the LACHCS could be identified for the evaluation of the building under the Architecture and Engineering context. The building does not appear to be a distinctive example of a type, period, or method of construction.

The building was designed by Raymond R. Shaw. Shaw is not recognized as a master architect. He appears to have worked in the Los Angeles area from the 1920s through 1950s. Shaw's career began at the George Kelham atelier in San Francisco. Shaw joined the R.F. Felchlin Company in Fresno in the early 1920s. The firm designed or built many of Fresno's largest buildings during the 1920s.²⁸ In 1925, Shaw opened a branch of the firm, which later became Felchin, Shaw & Franklin, in Los Angeles. The firm was dissolved in 1930. It appears that Shaw opened an independent practice; however, very limited information about his firm or practice is available. He was a

²⁷ City of Los Angeles Department of Building and Safety, Building Permit No. 08016-10000-06787, April 23, 2008.

²⁸ The firm designed or built many of Fresno's largest buildings, creating the high-rise Beaux-Arts skyline that characterizes the city today. Among the firm's many projects were the Bank of Italy Building (1918), the Patterson Building (1922), the San Joaquin Light & Power Building (1923), the Pacific Southwest Building (1923), and the Radin & Kamp Building (1925).



member of the AIA, but listed no firm or projects in the organization's directories.²⁹ A few articles from the *Los Angeles Times* indicate that he designed bank buildings throughout Los Angeles County. Shaw does not appear to be a notable local architect and the building on the Project site does not appear to be the work of a master.

High artistic value typically refers to "an aesthetic ideal," such as carefully detailed carvings, stained glass or high art sculpture. The building on the Project site was constructed from common materials such as stucco, concrete, and metal, with ordinary craftsmanship. As such, the building does not possess high artistic value.

The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. The built environment surrounding the Project site represents a variety of property types and periods of development. It was not identified as a potential historic district by SurveyLA due to this lack of cohesion. Since the building on the Project site is not part of a historic district and is being evaluated as an individual building, this aspect of Criterion C does not apply.

For the reasons outlined above, the building does not appear to be significant under Criterion C.

Criterion D

Criterion D generally applies to archaeological resources and this report only pertains to historical resources that are part of the built environment. This criterion may apply to a building in instances where it contains valuable information about such topics as construction techniques or human activity. In any case, the building must be the principal source of information. The building on the Project site does not contain important information about such topics as construction techniques or human activity. Therefore, it does not appear to be significant under Criterion D. There also is no reason to believe that the property has yielded or will yield information important to the prehistory or history of the local area, California, or nation.

Conclusion

The building on the Project site does not appear to be eligible for listing in the National Register for lack of significance. As the California Register and HCM criteria mirror the National Register criteria, the building is ineligible as a historical resource under state and local landmark or historic district designation programs for the same reasons outlined above.

²⁹ The AIA Directory listing for Shaw includes only a mailing address: 7963 Willow Glen Road, Los Angeles 46, CA. George S. Koyl, "Raymond Raleigh Shaw," *American Architects Directory* (R. R. Bowker Company: 1956), 501.

3.3 Historical Resources in the Project Study Area

Although there are no historical resources located on the Project site, there are three designated historical resources and four potential historical resources in the study area (see Figure 9 and Table 1). Historical resources are defined as properties that are listed under national, state, or local landmark or historic district programs. Potential historical resources are defined as properties that have been identified as eligible in historic resource surveys completed within the last five years, such as SurveyLA.



Figure 9: Historical resources in the study area by address or common name (Los Angeles County GIS files and GPA)



The four potential historical resources were all identified as eligible for listing through SurveyLA evaluation as part of the Central City Community Plan Area survey completed in 2016. The four potential historical resources were not researched or reevaluated on an intensive-level by GPA to independently determine their eligibility as potential historical resources. In order to provide a conservative analysis of the Project's potential impacts, this report does not refute any previous findings regarding the eligibility of these resources.³⁰ All Status Codes assigned to the potential historical resources in the study area are listed in Table 1. See Section 2.2 for the definitions of the Status Codes associated with each historical resource.

Map Reference Number	APN	Address	Name	Year Built	Evaluation or HCM Number
1	5139-011-901	1031 S. Hill Street	Joseph Basch Company Building (historic)	1920	3CS; 5S3 SurveyLA
2	5139-011-001	209 W. 11th Street	Hill Grill (current)	1933	3CS; 5S3 SurveyLA
3	5139-013-008	1036 S. Hill Street	Mayan Theater (common)	1927	5S1 HCM #470
4	5139-013-019	1050 S. Hill Street	Belasco Theater (common)	1926	5S1 HCM #476
5	5139-013-014	1023 S. Broadway	Western Pacific Building (common)	1925	3S; 3CS; 5S3 SurveyLA
6	5139-019-035	1111 S. Broadway	Los Angeles Herald Examiner Building (common)	1914	5S1 HCM #178
7	5139-012-015	1220 S. Olive Street	Iris Apartments (historic)	1907	3CS; 5S3 SurveyLA

There are additional historical resources in the vicinity of the study area (see Figure 10). These resources include three historic districts: the Broadway Theatre and Commercial District, the Spring Street Financial District, and the Hill Street Commercial District.

The Broadway Theatre and Commercial District is centered along Broadway between W. 3rd and W. 9th Streets. The district was listed on the National Register in 1977, and its boundaries were expanded in 2000.³¹ The district comprises commercial and entertainment buildings, primarily constructed between 1894 and 1931. The district is significant both for representing an important era of commercial activity in Los Angeles, as well as for its high concentration of important examples of architectural styles. The buildings within the district exhibit a variety of architectural styles, including Beaux Arts, Art Deco, and Moderne.

³⁰ CEQA Guidelines §15064.5.

³¹ Tom Sitton, "National Register of Historic Places Inventory Nomination Form: Broadway Theatre and Commercial District," 1977, 20; Teresa Grimes, "National Register of Historic Places Registration Form: Broadway Theatre and Commercial District Boundary Increase," 2000.



The Hill Street Commercial District is a roughly two-block long commercial corridor centered on Hill Street between W. 6th and W. 8th Streets in the area of Downtown Los Angeles known as the Jewelry District. The area was identified as a potential historical resource by SurveyLA in 2016.³³ The district is primarily composed of multi-storied, mixed-use commercial buildings that date to the early twentieth century and contains an excellent concentration of Beaux Arts commercial architecture and other, compatible architectural styles. It is also a significant example of an early twentieth-century commercial corridor in Los Angeles, reflecting early patterns of commercial development and the growth of the city's central business district.

³³ The district was assigned 3S, 3CS, and 5S3 Status Codes.

1. 1031 S. Hill Street, Joseph Basch Company Building (historic name)

1031 S. Hill Street is a five-story reinforced concrete building designed in a Gothic Revival style by the noted architects Walker & Eisen.³⁴ The building has been altered since it was originally constructed in 1920. Identified by SurveyLA as a significant example of a commercial property associated with Los Angeles' entertainment industry, the building was constructed for the Joseph Basch Company, which rented period furniture and paraphernalia to motion picture studios and played an important supporting role in the rise of the entertainment industry. The building was occupied by the company's offices, display rooms, and repair and storage facilities between 1920 and 1930. Due to alterations, including window replacement, door replacement and modification of the entrance, SurveyLA determined that the building does not retain sufficient integrity for listing in the National Register. The building was assigned Status Codes of 3CS and 5S3, eligible for listing under state and local landmark programs.³⁵



Figure 11: Joseph Basch Company Building, 1031 S. Hill Street, view facing southwest (GPA)

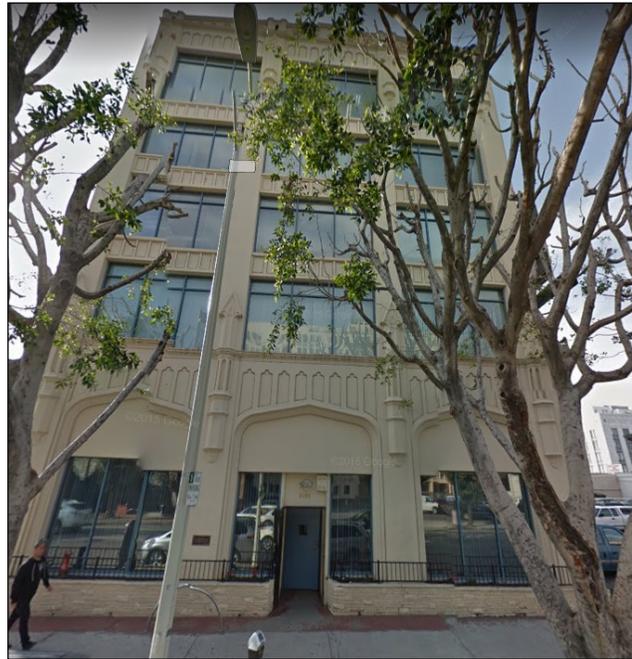


Figure 12: Joseph Basch Company Building, 1031 S. Hill Street, view facing west (Google)

³⁴ City of Los Angeles Department of Building and Safety, Building Permit No. 1920LA18543, October 7, 1920.

³⁵ Architectural Resources Group, "Consolidated Data Report: Central City Community Plan Area." SurveyLA Los Angeles Historic Resources Survey. Office of Historic Resources, May 2016.

2. 209 W. 11th Street, Hill Grill (current name)

The Hill Grill building at 209 W. 11th Street is a one-story food stand with a side gable front portion in a log cabin style. The rear portion of the building is utilitarian. The building has projecting roof signage. The Los Angeles County Assessor lists 1933 as the year of construction. Los Angeles City Directories associate several locksmiths with the address in the 1920s; there are no listings for later dates and none of the earlier listings are associated with food businesses.³⁶ SurveyLA identified the building as an excellent and rare example of Mimetic commercial architecture in Downtown Los Angeles and one of the few intact examples in the city. The context for the evaluation was “Other Context” under the theme for Design/Construction. According to SurveyLA, the building was designed by Los Angeles architects Nordstrom and Anderson; however, original building permits could not be found. Due to alterations, including a rear addition, window replacement, and infill of a door, SurveyLA determined that the building does not retain sufficient integrity for listing in the National Register. The building was assigned Status Codes of 3CS and 5S3, eligible for listing under state and local landmark programs.³⁷



Figure 13: Hill Grill, 209 W. 11th Street, view facing northwest (GPA)

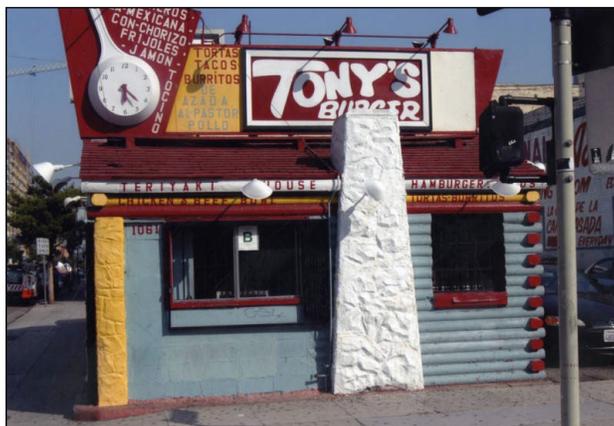


Figure 14: Tony's Burger stand, 209 W, 11th Street, view facing west, 2005 (LAPL)

³⁶ Los Angeles City Directory 1922, page 3130.

³⁷ Architectural Resources Group, “Consolidated Data Report: Central City Community Plan Area.” SurveyLA Los Angeles Historic Resources Survey. Office of Historic Resources, May 2016.

3. 1036 S. Hill Street, Mayan Theater

The Mayan Theater at 1036 S. Hill Street is a live performance theater completed in 1927. The south elevation abuts the Belasco Theater (see below).³⁸ The building was designed in the Exotic Revival style by noted master architects Morgan, Walls & Clements working with artist Francisco Cornejo. It is understood that Stiles Clements was the primary architect of the Mayan. The façade was designed following a typical pattern for theaters of the era, then it was divided into “modules,” to which Cornejo applied Maya-themed ornamentation. The building is significant in the context of architecture as an excellent example of the Exotic Revival style as well as an important work by Morgan, Walls & Clements and Francisco Cornejo. Morgan, Walls & Clements are widely recognized as master architects for the quality and influence of their work. Cornejo is not well known in the United States, but also considered a master. He was a Mexican painter, sculptor, and educator who specialized in Mayan and Aztec themes. The Mayan is his most important work in Los Angeles.

The building was designated HCM #460 in 1989 and was identified as eligible for listing in the National Register in the Central Business District Historic Resources Survey in 1983.



Figure 15: Mayan Theater, view northeast (GPA)

³⁸ “New Theater Completed, Mayan of Indian Design, Erected on Hill Street at cost of \$850,000, to open soon,” *Los Angeles Times*, July 31, 1927.

The Mayan and the Belasco (discussed below) theaters were owned by the oil magnate Edward L. Doheny and a partner, retired investor Nathan W. Stowell. The Mayan was managed by the same team that ran the Belasco, Gerhold Davis and Edward Belasco. Beginning in 1929, the Mayan theater presented motion pictures as well as plays and musicals. From 1936 until at least 1939, the Mayan was used by the Works Progress Administration's federal theater project. Duke Ellington's "Jump for Joy" opened in July of 1941 with an all-black cast including Dorothy Dandridge and Ivie Anderson. The show ran until September. Plans for a national tour leading to Broadway were dropped after Japan bombed Pearl Harbor and many cast members were drafted. The Mayan began showing Spanish language films in 1949, and pornographic films in 1969. The building was turned into a dance and music club in 1989.³⁹



Figure 16: Belasco and Mayan theaters on Hill Street, view northeast, 1930. The view is roughly from the Project site (Security Pacific National Collection, LAPL)

³⁹ "Mayan Theater," Historic Los Angeles Theaters, accessed on March 23, 2017, <https://sites.google.com/site/downtownlosangelesTheaters/mayan>

4. 1050 S. Hill Street, Belasco Theater

The Belasco Theater at 1050 S. Hill Street was one of two adjacent theaters constructed by Edward Doheny (see Mayan Theater, above). The Belasco Theater was the first of the two theaters to be completed and opened in 1926. The Belasco was also designed by Morgan, Walls & Clements. Though altered, its style is a fanciful Churrigueresque.⁴⁰ The façade is divided into twelve bays with a frieze of conquistador figures set in niches capped by Art Deco stylized pineapple spikes. Decorative features from the façade have been removed and replaced with smooth stucco. In addition to the theater auditorium, the building features a ballroom.

The building was named after its operator, Los Angeles-based producer Edward Belasco. The theater was constructed for live plays. The first show was a stage production of “Gentlemen Prefer Blondes.” Like the Mayan, the Belasco was not used as a live performance theater after the decline of the Downtown Los Angeles theater scene in the 1950s. The Belasco closed in 1952 and re-opened as a live and events venue in 2011.

The building was designated HCM #476 and was identified as eligible for listing in the National Register in the Central Business District Historic Resources Survey in 1983.



Figure 17: Belasco Theater, 1050 S. Hill Street, view facing east (GPA)

⁴⁰ City of Los Angeles Department of Building and Safety, Building Permit No. 1926LA11854, April 20, 1926.

5. 1023 S. Broadway, Western Pacific Building

The Western Pacific Building at 1023 S. Broadway is a Beaux Arts style building designed by master architecture firm Walker & Eisen in 1925.⁴¹ The building has a tapered rectangular footprint. There are two light wells, one each at the north and south ends of the building, forming an H-shape on the upper levels. Twelve-stories in height, the building has a concrete foundation and a reinforced concrete structure. The Broadway façade is clad in terracotta and red brick and is organized horizontally into three sections, exhibiting the base-shaft-capital column organization that characterizes the Beaux Arts style. The side and rear elevations are clad in stucco without design features.



Figure 18: Western Pacific Building, 1023 S. Broadway, view facing southwest, 2018 (GPA)

The building was initially developed in 1925 by the Los Angeles Investment Company. The company was founded around 1896 and got its start producing hundreds of bungalows a year through company-owned lumber mills, warehouses, and hardware stores. Its reputation for quality long-lasting construction helped it grow to the largest cooperative building company in America by the early 1900s.⁴² As early as 1911, the company branched out into commercial and office building construction.⁴³ The Western Pacific Building was developed as office space and leasing

⁴¹ City of Los Angeles Department of Building and Safety, Building Permit No. 1925LA13807, April 17, 1925; City of Los Angeles Department of Building and Safety, Building Permit No. 1925LA10519, April 14, 1927.

⁴² "Real Estate, Investment and Mining," *Los Angeles Times*, May 11, 1907.

⁴³ "Site Cleared for Big Block: Excavation for Skyscraper to Start Tomorrow," *Los Angeles Times*, August 13, 1911.

demand was so high that an addition was underway less than a year after the original portion was completed.⁴⁴ Any differences in the two phases of construction, the northeast half in 1926 and the southwest half in 1927 are imperceptible from the exterior. Research in contemporary newspapers did not reveal the reasoning behind the building's name, but it was commonly called the "Western Pacific Building" from its inception.⁴⁵

The building is significant in the context of architecture as an excellent example of Beaux Arts Classicism, as well as an important work by the master architects Walker & Eisen. The Western Pacific Building was identified as eligible for listing in the National Register in the Central Business District Historic Resources Survey in 1983. The building was re-surveyed by SurveyLA in 2016 and assigned Status Codes of 3S, 3CS, and 5S3, eligible for listing under national, state, and local landmark programs.⁴⁶



Figure 19: Western Pacific Building, 1928 (LAPL)

⁴⁴ "Ground Broken for New Unit: Broadway Building Addition Started," *Los Angeles Times*, April 27, 1927.

⁴⁵ "Broadway to Get New Structure," *Los Angeles Times*, August 7, 1926, A16 and "Mayor Digs at start of Building," *Los Angeles Times*, April 12, 1927, A5. The name does not appear to be associated with the Western Pacific Railroad, which was headquartered in San Francisco.

⁴⁶ Architectural Resources Group, "Consolidated Data Report: Central City Community Plan Area." *SurveyLA Los Angeles Historic Resources Survey*. Office of Historic Resources, May 2016.

6. 1111 S. Broadway, Los Angeles Herald Examiner Building

The Los Angeles Herald-Examiner Building is a five-story Mission Revival style building constructed between 1914 and 1915. The building was designed by Julia Morgan for the Los Angeles *Examiner* newspaper. The *Examiner* was first published in 1903 and quickly outgrew its original offices near 5th Street and Broadway. William Randolph Hearst, the paper's publisher, hired architect Julia Morgan to design this building a few blocks south on Broadway at 11th Street. The Los Angeles Herald-Examiner Building is monumental and highly ornate. It is distinguished by elevations of exuberant architectural features.

The mass of the concrete and steel building is markedly symmetrical, with a central five-story pavilion flanked by identical three-story wings stretching the length of the six bays to each side of the central pavilion. Towers capped in colorfully tiled domes anchor the ends of the wings. At the ground and second floor on Broadway, a central entrance portal with Mission Revival style parapet is flanked by domed bell towers. Large arched windows at the ground level extend across the seven bays of each wing along Broadway and six bays along 11th Street. On the second story, tripartite windows are centered above the arches. The building features a complex, layered parapet. Corbels, pilasters, balconettes, and other architectural elements characterize the fanciful design across all elevations. At the time of completion in 1915, the interior of the Los Angeles Herald-Examiner Building housed all functions of the newspaper: from newsroom offices to printing facilities to an apartment for Hearst.

The most notable alteration to the exterior of the building was the enclosure of most ground floor arched openings. The interior was continually altered throughout the life of the building.



Figure 20: Los Angeles Herald Examiner Building, 1111 S. Broadway (GPA)

The Los Angeles Herald-Examiner Building is one of the few buildings in Los Angeles designed by Morgan, and was her first major commission for Hearst, who became her life-long client. The construction of the Los Angeles Herald-Examiner Building marked the beginning of the relationship between Morgan and Hearst that would result in numerous buildings and large estates – including Hearst Castle – that are among the most architecturally significant buildings in California from the era.



The Los Angeles Herald-Examiner Building was determined to be significant under Criterion B for its association with Hearst, owner of the Los Angeles *Examiner* and a prominent figure in American publishing, film, and politics during the first half of the twentieth century. The building is also significant under two aspects of Criterion C for its architecture. First, it is significant as a work of Julia Morgan, one of the earliest and most prominent female master architects of the twentieth century. The building is one of the only industrial projects Morgan designed. The building is also significant as an excellent example of the Mission Revival style of architecture that was popular throughout Southern California in the early part of the twentieth century.

The building is designated HCM #178 and was formally determined eligible for listing in the National Register (Status Code "2S1") on April 21, 1992.

7. 1220 S. Olive Street, Iris Apartments (historic name)

1220 S. Olive Street was constructed as an apartment hotel in 1908 for W.W. Middleoff and Eliza F.H. Middleoff.⁴⁷ It was designed by R.B. Young, an architect who had practiced in Los Angeles since the 1880s and was the designer of several multi-story buildings in Los Angeles during the decades around turn of the twentieth century.⁴⁸ The building was listed under the name Iris Apartment in directories from the 1910s through 1940s. At the time of construction, the building was a typical residential property type for the area. As the area transitioned to industrial and commercial uses in the 1910s, the residential hotel property type was increasingly rare. The building was identified by SurveyLA in 2016 as an "Excellent and rare example of an early twentieth-century apartment house in Downtown Los Angeles, exhibiting essential characteristics of the property type; few examples from this period remain. Due to alterations, including window replacement, the building does retain sufficient integrity for listing in the National Register." It was assigned Status Codes of 3CS and 5S3, eligible for listing under state and local landmark programs.



Figure 21: Iris Apartments, 1220 S. Olive Street, view facing east (GPA)

⁴⁷ City of Los Angeles Department of Building and Safety, Building Permit No. 11908LA02903, May 28, 1908.

⁴⁸ Los Angeles City Directory 1886-1887, p. 181; Pacific Coast Architecture Database. "Robert Brown Young (Architect)." Accessed January 2, 2019, <http://pcad.lib.washington.edu/person/1373/>.

4. PROJECT IMPACTS

4.1 Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows:

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Title 14 California Code of Regulations Section 15064.5(b)(2) in turn explains that a historical resource is “materially impaired” when a project:

Demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.

The following factors are set forth in the City of Los Angeles' “L.A. CEQA Thresholds Guide,” which states that a project would normally have a significant impact on a historical resource if it would result in a substantial adverse change in the significance of the historical resource. A substantial adverse change in significance occurs if the project involves:

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

As such, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not the project will alter in an adverse manner the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs such as the list of HCMs.

4.2 Project Description

The proposed Project includes demolition of the existing vacant two-story warehouse and new construction of a 40-story (520-foot) mixed-use hotel, residential condominium, and commercial development building consisting of 319 residential condominium units; 160 TORS hotel guest rooms; and approximately 3,249 square feet of ground floor commercial accommodating two restaurants. The project will include one level of subterranean parking, one level of ground floor commercial uses, three levels of above ground parking, eight levels of TORS hotel guest rooms

located on levels 6 through 13, and residential condominium units located on levels 14 through 38. Entrance to the project's automobile parking will be provided from the alley abutting the west side of the project, accessed by West 11th Street, and from South Hill Street. All above ground parking levels will be screened by an integrated system of opaque glazing, vertical beams/fins, and landscaping to ensure that the automobiles are not visible. There will be no headlight visibility as the automobiles are turned off when loaded into the automated parking system.

4.3 Analysis of Project Impacts

The Project would have no direct impacts on historical resources. There are no historical resources on the Project site and no historical resources would be demolished, destroyed, relocated, or altered as a result of the Project. Therefore, this report only analyzes the potential for the Project to result in indirect impacts and cumulative impacts on the historical resources in the vicinity. Indirect impacts or secondary effects are reasonably foreseeable and caused by a project but occur at a different time or place.⁴⁹ Cumulative impacts refer to impacts of a project and related projects in the vicinity, when taken as a whole, that substantially diminish the number or significance of historical resources within the same or similar context or property type.



Figure 22: Since 2015, several parcels within the study area have been sites of new construction, changing the general setting of the identified historical resources.

⁴⁹ 14 CCR §15358 (a)(2)

Indirect Impacts

In determining the potential for indirect impacts of adjacent new construction on the historical resources in the study area, the central question is whether the proposed Project would cause a “material impairment” to the significance of the nearby historical resources.⁵⁰ Material impairment occurs where a project demolishes or alters the physical characteristics that convey the significance of a historical resource and that justify its inclusion in or eligibility for inclusion in national, state, or local landmark or historic district programs pursuant to the requirements of CEQA. Such an effect would only occur if the historical resources in the study area no longer retained sufficient integrity to convey their significance as a result of the proposed Project.

According to National Register *Bulletin* #15, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. The Project would not have any impact on the identified historical resources’ physical characteristics that convey their historic significance and justify their inclusion in, or eligibility for, applicable landmark designation programs. Because the Project would not alter physical characteristics of the historical resources, the only relevant aspect with respect to the impact of the new building on these historical resources is setting. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property or historic district as well as the resource’s broader surroundings. This analysis considers whether the integrity of setting of the historical resources in the study area would be so diminished by the new construction to the degree they would no longer qualify as historical resources under national, state, or local landmark or historic district programs.

As described in Section 3.3 above, there are three listed and four potential historical resources in the study area. None of the historical resources are within the same block as the Project site. All of the historical resources are separated from the Project site by a street. Because the Project site is located outside the parcel boundaries of the seven historical resources in the study area, the Project would not impact their integrity of immediate setting. Only one historical resource, 209 W. 11th Street (Hill Grill) is not separated from the Project site by intervening buildings. The other six historical resources would not be affected by the new building, due to the significant physical and visual separation between these historical resources and the Project site.

The Hill Grill is located at the northwest corner of 11th and Hill streets, directly across 11th Street north of the Project site. However, as more fully described below, the new building would not affect the physical integrity or historic significance of this historical resource. As such, the Project would have no indirect impacts on the historical resources in the study area.

In determining impacts of adjacent new construction on an individual resource such as the Hill Grill, the central question is whether the new building would affect the physical integrity of the historic building to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the Hill Grill no longer retained sufficient integrity to convey its significance. The LACHCS prepared by the Office of Historic Resources establishes eligibility standards for associated property types. SurveyLA identified the Hill Grill building as an excellent and rare example of Mimetic commercial architecture in Downtown Los Angeles and one of the few intact examples in the city. The context for the evaluation was “Other Context” under the theme for Design/Construction. Though integrity thresholds have not been established for Mimetic architecture, the building is an example of the walk-up food stand property type. Mimetic walk-

⁵⁰ Pub. Res. Code § 21084.1; 14 CCR §15064.5(b).



up food stands like the Hill Grill are included in the Commercial Development Context. For walk-up food stands to be eligible, they “should retain integrity of location, design and feeling.”⁵¹ These are the critical factors of integrity - not setting. The integrity considerations for walk-up food stands recognize that the setting may have changed from the period of significance.

The Hill Grill did not retain integrity of setting when it was evaluated eligible for listing at the local and state levels by SurveyLA in 2016. When the Hill Grill was constructed in the 1930s, the setting comprised low, medium, and higher rise buildings from the 1910s and 1920s. Immediately north of the Hill Grill building was the five-story high Joseph Basch Company Building. To the south was the nine-story high Southwestern University. In the later decades of the twentieth century, the setting of the Hill Grill developed into its present state, characterized by a mixture of low, medium, and high rise residential, commercial, and institutional buildings.

The Project would introduce a new building substantially taller than the current building on the Project site to the setting of the Hill Grill; however, the height of the new building (520 feet above ground level) would not diminish the integrity of the Hill Grill to a degree that it would no longer retain integrity as a whole. The Hill Grill would still retain integrity of location, design, and feeling as a Mimetic walk-up food stand building. According to the eligibility standards in the LACHCS, buildings of this property type may not retain integrity of setting while still retaining sufficient integrity to convey their significance. The Project’s proposed change to the setting, along with changes proposed by nearby related projects’ heights and mass, would not impact an essential aspect of integrity for the Hill Grill to convey its significance. As such, the changes to the setting of the Hill Grill would not cause an adverse indirect impact to the setting of the historical resource.

In the dense urban setting of Downtown Los Angeles, the construction of new buildings across the street from historic buildings is not uncommon, and new development has already occurred in close proximity to these historical resources. The seven historical resources’ broader surroundings, namely their relationship to their surrounding features, has already been altered by demolition and new construction.

The parcels within the study area along Grand, Olive, Hill, and Broadway are developed with a variety of mixed-use commercial, institutional, manufacturing, and residential buildings and surface parking lots. Development does not reflect a single era or type of construction. The area is largely characterized by mid- and high-rise apartments, condominiums, and hotels from the 1960s to 2010s (see Figures above). Interspersed between these buildings are a handful of apartments, commercial blocks, government office towers, and light industrial buildings from earlier decades of the twentieth century.

The Project would continue the pattern of development in place since the South Park area’s transformation began in the 2000s (see Figures below). Therefore, while the Project would introduce a new visual element to the area surrounding the seven historical resources in the study area, the overall integrity of setting has already been diminished by changes to the built environment over time.

⁵¹ “Commercial Development, 1850-1980, Restaurants, 1880-1980, Commercial-Food, Walk-up/Stand.” Los Angeles Citywide Historic Context Statement. City of Los Angeles Office of Historic Resources, December 31, 2013.



Figure 23: 1000 S. Grand Avenue



Figure 24: 1001 S. Olive Street



Figure 25: 1200 S. Grand Avenue

These figures show typical recent construction in the study area. This development largely consists of mid- and high-rise apartments, condominiums, and hotels (all photos GPA).

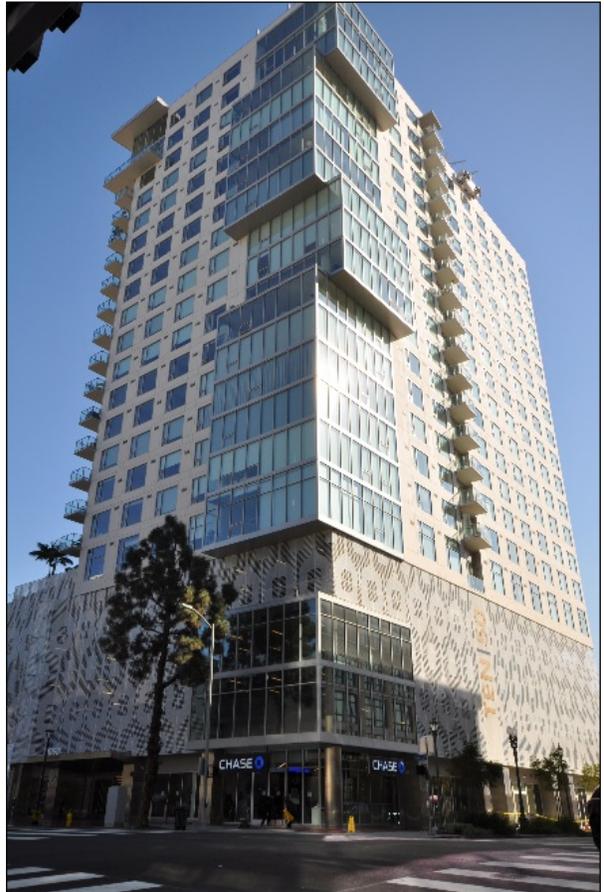


Figure 26: 1050 S. Grand Avenue

Views of historical resources would not be obscured as a result of the Project. The most important views of these historical resources are of their primary, street-facing elevations. None of the street-facing elevations of the historical resources would be obscured by the Project. New construction at 1108 S. Hill Street, the former site of the Press Building, has already obscured views of the rear elevation of the Los Angeles Herald-Examiner Building on Broadway that may have been visible from the Project site.



Figure 27: New construction at 1108 S. Hill Street with Los Angeles Herald-Examiner building in background, left. View facing southeast from northwest corner of Hill and 11th Streets (in front of Hill Grill building) (GPA)

Cumulative Impacts

Impacts to historical resources, if any, tend to be site specific. However, cumulative impacts would occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type as those within the Project site.

As discussed above, the Project would have no direct or indirect impacts on historical resources on the Project site or in the study area. There are nine proposed and ongoing projects located within the study area. They are the following:

Related Project No. 8: 1111 S. Broadway - No historical resources are being demolished, destroyed, or relocated as a result of this project, which includes the Herald Examiner Building. The building is a historical resource as it is listed under national, state, and local landmark programs. It is being rehabilitated in compliance with the Standards, therefore the project will have a less than significant impact on the historical resource.

Related Project No. 9: 1120 S. Grand Avenue - This project known as Aven Tower was completed in 2019. No historical resources were demolished, destroyed, relocated, or altered as a result of the project.

Related Project No. 15: 1030 S. Hill Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

Related Project No. 20: 1045 S. Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project. An existing commercial building would be removed, but it is not a historical resource

Related Project No. 21: 1155 S. Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.



Related Project No. 24: 1105 S. Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

Related Project No. 26: 1000 S. Hill Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

Related Project No. 27: 1001 S. Olive Street – This project known as Oakwood Olympic & Olive was completed in 2017. No historical resources were demolished, destroyed, relocated, or altered as a result of the project.

Related Project No. 31: 1120 S. Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

These projects would continue an established pattern of development in the South Park area and there is no potential for cumulative impacts to the setting of historical resources in the study area as a result of this development pattern. Therefore, there would be no potential for cumulative impact to historical resources in the immediate vicinity.

Cumulative impacts to historical resources must also consider changes within the same historic district. However, the Project site is not located within the boundaries of a historic district. Additionally, cumulative impacts to historical resources must consider whether a project substantially diminishes the number or significance of historical resources of the same property type, even if they are not otherwise on the related projects list. As discussed above, the Project would have no direct or indirect impacts on historical resources on the Project site or in the study area. As discussed in Section 3.2, the building on the Project site does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance. Therefore, there would be no potential to contribute cumulative impacts to historical resources of the same property type.

Conclusion

In conclusion, while the Project would introduce a new visual element to the study area, it would not affect the setting of any of the identified historical resources. The overall integrity of setting of the study area has already been changed by demolition and new construction. The seven historical resources would also remain highly visible and continue to be prominent features of the block on which they are located. Therefore, the Project would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree that they would no longer be eligible for listing under national, state, or local landmark programs. None of the historical resources in the study area would be materially impaired as a result of the Project.

5. CONCLUSIONS

The Project would have no direct impacts on any historical resources. There are no historical resources on the Project site and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Project. The indirect impacts the Project could have on the historical resources in the study area were also analyzed. The Project would have no indirect impacts on the identified historical resources. The new building would introduce a new visual element to the immediate surroundings of the historical resources in the study area; however, the Project would not result in a substantial adverse change to the integrity of historical resources to the degree that they would no longer be eligible for listing as historical resources defined by CEQA. There would be no potential for cumulative impacts to historical resources of the same property type as the building demolished as a result of the Project is not a historical resource. Furthermore, the Project site is not located within the boundaries of a historic district. No historical resources would be materially impaired by the Project. No mitigation is required or recommended.

6. SOURCES

- AIA Historical Directory of American Architects, various dates.
- California Code of Regulations, California Office of Administrative Law, State of California Government.
- City of Los Angeles Administrative Code.
- City of Los Angeles Street Directory, various dates
- Code of Federal Regulations, Title 36: Parks, Forests, and Public Property. Office of the Federal Register, National Archives and Records Administration, United States Government.
- Grimes, Teresa. "National Register of Historic Places Registration Form: Broadway Theatre and Commercial District Boundary Increase," 2000.
- Grimes, Teresa. "National Register of Historic Places Registration Form: Spring Street Financial District Boundary Increase," 2000.
- Historical Aerials. *Various Dates*. Accessed January 8, 2019, <https://www.historicaerials.com/viewer>.
- Historic Resources Group. *Cultural Resources Technical Report: Proposed Herald-Examiner Project: Broadway, Hill Street & 12th Street Sites, Los Angeles, California*. Los Angeles: October 2005 (Updated February 2006).
- Los Angeles Department of Building and Safety Permit Records, various dates.
- Los Angeles Office of Historic Resources, Los Angeles Citywide Historic Context Outline and Summary Tables. 2015.
- Los Angeles Public Library historic photograph collection.
- Los Angeles Times*, various dates.
- National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, 2002.
- National Register Bulletin #16: How to Complete the National Register Registration Form*. Washington D.C.: National Park Service, 1997.
- National Register Bulletin #21: Defining Boundaries for National Register Properties Form*. Washington D.C.: National Park Service, 1997.
- Pitt, Leonard and Dale Pitt. *Los Angeles A to Z*. Berkeley, CA: University of California Press, 2000.
- Sanborn Map Company. *Los Angeles Volume 1*. Sheet 90. 1955.
- Sitton, Tom. "National Register of Historic Places Inventory Nomination Form: Broadway Theatre and Commercial District," 1977.
- Sitton, Tom. "National Register of Historic Places Inventory Nomination Form: Spring Street Financial District," 1978.
- SurveyLA. *Historic Resources Survey Report: Central City Community Plan Area*. Prepared by Architectural Resources Group, September 2016.



Appendix A - Résumé



Allison M. Lyons has been involved in the field of historic preservation since 2007. Allison graduated from Columbia University with a Master of Science in Historic Preservation. She has since worked in private historic preservation consulting in California. Her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; Historic American Buildings Survey/Historic American Engineering Record recordation; large-scale historic resources surveys; Federal Rehabilitation Tax Credit and Mills Act applications; local landmark applications; and evaluations of eligibility for a wide variety of projects and property types throughout California. She is also highly experienced in writing National Register of Historic Places nominations as well as historic context statements for local governments.

AMANDA DUANE



Amanda Duane is an Associate Architectural Historian at GPA. She has been involved in the field of historic preservation since 2011. Amanda graduated from Savannah College of Art and Design with a Bachelor of Fine Art degree in Historic Preservation. She has since worked in local government and private historic preservation consulting in California. Amanda joined GPA in 2012 and her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; Historic American Buildings Survey/Historic American Engineering Record recordation; large-scale historic resources surveys; Federal Rehabilitation Tax Credit and Mills Act applications; National Register Place nominations; local landmark applications; historic context statements; and evaluations of eligibility for a wide variety of projects and property types throughout California. She is experienced in expertly guiding property owners through the process of securing local and federal historic tax credits and working with local governments to develop design guidelines for administering local design reviews. Amanda is also highly skilled in graphic design as well as interpretation and exhibition design.

Educational Background:

- B.F.A, Historic Preservation, Savannah College of Art and Design, 2011

Professional Experience:

- GPA Consulting, Associate Architectural Historian, 2012-Present
- Architectural Resources Group, Intern, 2012
- City of Los Angeles, Office of Historic Resources, Intern, 2011-2012

Qualifications:

- Meets the Secretary of the Interior's Professional Qualification Standards for architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.
- National Preservation Institute, Section 106: An Introduction

Professional Activities:

- California Preservation Foundation Conference Programs Committee, 2017

Selected Projects:

- 1527 17th Street, Secretary of the Interior's Standards Compliance Memo, City of Santa Monica, 2018-21
- Bank of Italy Building, Los Angeles, Federal Tax Credit Application and National Register Nomination, 2015-2019
- Bartlett Building, Los Angeles, Historic-Cultural Monument Application and Mills Act Application, 2015
- Bradbury Building, Los Angeles, Tenant Improvement Guidelines, 2016-2017
- Buck Studios, Los Angeles, Secretary of the Interior's Standards Compliance Memo, 2019-2020
- Commonwealth Nursery Griffith Park, Los Angeles, Character-Defining Features Analysis and CEQA Historical Resource Technical Report, 2014
- Foreman Building, Los Angeles, Federal Tax Credit Application, Part 1 and Mills Act Application, 2015
- Hillcrest Motors Building, Los Angeles, Character-Defining Features Analysis and CEQA Historical Resource Technical Report, 2013
- Municipal Ferry Building, San Pedro, Secretary of the Interior's Standards Compliance Memo, 2019
- Nirvana Apartments, Los Angeles, Federal Tax Credit Application, Part 1, 2018

Appendix C-2
**Cultural and Paleontological
Resources Assessment Report**

1111 SOUTH HILL STREET CULTURAL AND PALEONTOLOGICAL RESOURCES ASSESSMENT REPORT

PREPARED FOR:

Los Angeles Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012

PREPARED BY:

ICF
555 W. 5th Street, Suite 3100
Los Angeles, CA 90013
Contact: Gino Ruzi
213.312.1754

December 2021



ICF. 2021. *1111 South Hill Street Cultural and Paleontological Resources Assessment Report*. December (ICF 00583.19) Los Angeles, CA.

Executive Summary

This cultural and paleontological resources technical report discusses potential impacts under the California Environmental Quality Act (CEQA) on paleontological and archaeological resources resulting from the proposed development of the 1111 South Hill Street Project in the South Park neighborhood, Los Angeles, California (project). The project would demolish the existing building at the same location and construct a 40-story mixed-use building with hotel, residential, and commercial uses.

A study area consisting of a 0.5-mile buffer zone around the project site was established to consider the potential for both direct and indirect impacts of the project on cultural and paleontological resources, as defined by CEQA. Three CEQA-defined resources were considered in this study: (1) archaeological resources; (2) tribal cultural resources; and (3) paleontological resources.

A records search was conducted at the South Central Coastal Information Center (SCCIC), at California State University, Fullerton, on April 6, 2020. The records search indicated a total of 46 cultural resource studies have been conducted within a 0.5-mile radius of the project site, with one of them conducted within a portion of the project area. However, no archaeological resources were found in any of the aforementioned studies, which include both the project site and the 0.5-mile area around it. No pedestrian survey was conducted for this study, as the project site is fully developed.

Because the project is in an extensively developed urban environment, the potential for encountering either prehistoric or historical archaeological resources is considered low. Based on the historical disturbance and construction in the area, the sensitivity for intact buried archaeological deposits of historic age within the project site is relatively low. However, if unanticipated archaeological resources are encountered during ground-disturbing activities, this report recommends that the project comply with the conditions of approval (see Section 6.2.1 of this report), which would reduce potentially significant unforeseen impacts to a less-than-significant level. Similarly, if human remains of Native American origin are exposed during construction, compliance with the conditions of approval (Section 6.2.1 of this report), would reduce potentially significant unforeseen impacts to a less-than-significant level.

A sacred lands file search was requested from the Native American Heritage Commission (NAHC) on April 14, 2020. The NAHC responded that the Sacred Lands File yielded negative results for tribal cultural resources.

The proposed excavations for the building foundation for the project are expected to be up to 45 feet in depth and would occur mostly within younger Quaternary Alluvium deposits. These deposits are assigned a low paleontological sensitivity, but because ground-disturbing activities are projected in relatively deeper deposits, paleontological monitoring is recommended for the project. If fossils are encountered during ground-disturbing activities, this report recommends that the project comply with proposed mitigation measure MM-GEO-1, which would reduce potentially significant unforeseen impacts to a less-than-significant level.

This page intentionally left blank.

Contents

List of Tables	iii
List of Figures.....	iii
List of Acronyms and Abbreviations	iv
	Page
Executive Summary.....	i
Chapter 1 Introduction	1-1
1.1 Project Location	1-1
1.2 Project Description	1-1
1.3 Project Background.....	1-2
1.3.1 Study Area.....	1-2
1.3.2 Regulatory Framework	1-2
Chapter 2 Environmental and Cultural Setting.....	2-1
2.1 Environmental Setting	2-1
2.2 Cultural Setting	2-1
2.2.1 Prehistoric Background.....	2-1
2.2.2 Ethnographic Background.....	2-2
2.2.3 Historic Background.....	2-3
Chapter 3 Literature Review and Results.....	3-1
3.1 Research Methods	3-1
3.2 Archival Research.....	3-1
3.3 Record Search Results.....	3-2
3.3.1 Previous Studies.....	3-2
3.4 Geologic Map Review and Paleontological Records Search	3-5
Chapter 4 Sacred Lands File Search	4-1
Sacred Lands File Search	4-1
Chapter 5 Impacts Analysis.....	5-1
5.1 Thresholds of Significance	5-1
5.2 Discussion of Potential Impacts	5-1
5.2.1 Archaeological and Tribal Cultural Resources	5-1
5.2.2 Paleontological Resources	5-2
Chapter 6 Conclusions and Recommendations	6-1
6.1 Conclusions	6-1

6.2 Recommendations6-1
 6.2.1 Conditions of Approval and Mitigation Measures.....5-1

Appendix A Resume of Author
Appendix B NAHC Response, April 30, 2019
Appendix C SCCIC, Record Search Result Letter, May 16, 2019
Appendix D Paleontological Record Search Response Letter, McLeod, Samuel, Natural History Museum of Los Angeles County, Los Angeles, CA. May 6, 2019

Tables

	Page
Table 1. Cultural Resources Surveys Conducted within 0.5 Mile of the Project Site.....	3-2

Figures

	Follows Page
Figure 1. Regional Vicinity Map	1-5
Figure 2. Site Location (including Study Area	1-5

Acronyms and Abbreviations

APN	Assessor's Parcel Number
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
NAHC	Native American Heritage Commission
NHMLAC	Natural History Museum of Los Angeles County
NRHP	National Register of Historic Places
PRC	Public Resource Code
SCCIC	South Central Coastal Information Center
sf	square feet
SHPO	State Historic Preservation Officer
SVP	Society of Vertebrate Paleontology
TCR	tribal cultural resource

This page intentionally left blank.

This cultural and paleontological resources technical report discusses potential impacts under the California Environmental Quality Act (CEQA) on paleontological and archaeological resources resulting from the proposed development of the 1111 South Hill Street Project in the South Park neighborhood of Los Angeles, California (project). The project would demolish the existing building at the same location and construct a 43-story above-grade and two-story below-grade mixed-use building with hotel, residential, and commercial uses, comprising approximately 488,031 square feet of floor area.

1.1 Project Location

The project site is located in downtown Los Angeles in the South Park neighborhood, between 1101–1115 South Hill Street and 206–210 West 11th Street. The site is bounded by an alley to the west, South Hill Street to the east, West 11th Street to the north, and a surface parking lot and commercial building to the south (see Figure 1. Regional Vicinity Map) and encompasses Assessor's Parcel Number (APN) 5139-019-022.

The project site is less than 0.3-mile northeast of the Metro Rail Pico Station, which serves the A Line (formally Blue), and E Line (formally Expo); approximately 0.7 mile southeast of the 7th/Metro Center Station, which serves the A Line, B Line (formally Red), D line (formally Purple), and E Line; and approximately 0.8 mile south of the Metro Pershing Square Station, which serves the B and D lines. The A Line provides rail service between the city of Long Beach and downtown Los Angeles with connecting service to the Metro C Line (formally Green) (serving Norwalk, Redondo Beach, and the Los Angeles International Airport via shuttle). The E Line provides rail service between downtown Los Angeles, Culver City, and Santa Monica. The Metro B Line provides service between downtown Los Angeles and Hollywood/North Hollywood, with connecting service to the Metro G line (formally Orange) (serving the west Valley and Chatsworth).

1.2 Project Description

The proposed 1111 South Hill Street Project ("Project") would develop a 40-story mixed-use building on an approximately 0.63-acre site (project site) located within the South Park area of the Central City Community Plan ("Community Plan") area of the City of Los Angeles (City).

The project site is currently developed with an 81,993 square foot warehouse that has been vacant since approximately 2013. The project proposes to remove the existing warehouse and construct up to 319 multi-family residential units, up to 3,429 square feet (sf) of ground floor commercial uses, up to 160 hotel rooms designated as Transient Occupancy Residential Structure (TORS) units¹, up to 436 vehicle parking spaces, and up to 347 bicycle spaces.

¹ Per LAMC Section 12.03 a Transient Occupancy Residential Structure (TORS) is, "A residential building designed or used for one or more dwelling units or a combination of three or more dwelling units and not more than five

1.3 Project Background

1.3.1 Study Area

The study area established for the project is defined as the geographic areas within which the project may directly or indirectly cause impacts on the character or use of historical resources, as considered by CEQA. Section 15064.5 of the California Code of Regulations defines archaeological and historical resources as “any object, building, structure, site, area, place, record, or manuscript [determined] to be historically significant, or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.” The study area includes both horizontal and vertical extents to take into consideration possible impacts on these types of resources.

The horizontal extent of the study area (Figure 2. Site Location (including Study Area)) was selected based on the following criteria and the project’s potential to affect archaeological resources within the project site:

- Direct spatial extent to the project site
- Close adjacency to the project site, defined for this analysis as a 0.5-mile radius of the project site, used for record search only.

The study area’s vertical extent includes the level of existing ground surface to the maximum anticipated depth of project-related subsurface ground disturbance, and is limited to the area of the project site only. This area accounts for the project’s potential to affect subsurface archaeological resources.

1.3.2 Regulatory Framework

Federal, state, and local regulations recognize the public’s interest in cultural resources and the public benefit of preserving them. These laws and regulations require analysts to consider how a project might affect cultural resources and to take steps to avoid or reduce potential damage to them. A cultural resource can be considered as any property valued (e.g., monetarily, aesthetically, or religiously) by a group of people. Valued properties can be historical in character or date to the precontact past (i.e., the time prior to contact with European Americans).

The project is subject to the requirements of CEQA, and also may be affected by other state and municipal laws, regulations, and building codes regarding historical resources. These might include the California Register of Historical Resources (CRHR), the California State Historical Building Code, and the City of Los Angeles’ Historic-Cultural Monument and Historic Preservation Overlay Zone programs. In addition, the City of Los Angeles requires that cultural resources studies, surveys, and reports, such as this technical report, consider the potential eligibility of properties for listing in the National Register of Historic Places (NRHP). Moreover, the appropriate treatment of historical properties at the municipal, state, and federal levels is informed by Standards and Guidelines promulgated by the U.S. Secretary of the Interior.

guest rooms or suites of rooms wherein occupancy, by any person by reason of concession, permit, right of access, license, or other agreement is for a period of 30 consecutive days or less, counting portions of calendar days as full days.” The Hotel rooms designated as TORS units are further described as “extended-stay units with kitchens, operating as a commercial hotel”.

This document was prepared to satisfy requirements of all applicable cultural resource regulations.

State

California Register of Historical Resources

The National Historic Preservation Act mandates the selection and appointment in each state of a State Historic Preservation Officer (SHPO). Each SHPO is tasked, among other duties, with maintaining an inventory of historic properties. In California, the state legislature established additional duties for the SHPO, including the maintenance of the CRHR. Established by Public Resource Code (PRC) Section 5024.1(a) in 1992, the CRHR serves as “an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent feasible, from substantial adverse change.” According to PRC Section 5024.1(c), the CRHR criteria broadly mirror those of the NRHP. The CRHR criteria are found in PRC Section 5024.1(c). They are as follows:

An historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The general rule is that a resource must be at least 50 years old to qualify for the CRHR. In addition, the resource must meet one or more of the aforementioned criteria and must possess integrity. Integrity is defined as “the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.”

There are several ways for resources to be included in the CRHR. A resource can be listed in the CRHR based upon a nomination and public consideration process. Additionally, a resource that is subject to a discretionary action by a governmental agency will be evaluated for eligibility for the CRHR. Properties listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

California Environmental Quality Act

Established in 1970, CEQA requires state and local government agencies to analyze and publicly disclose potentially significant environment impacts of proposed projects. Moreover, it requires the development and adoption of mitigation measures to lessen significant impacts. At Section 21060.5, the State CEQA Guidelines define the environment to include “objects of historic...significance.” The definition of “historical resources” is provided by Section 15064.5(a) of the State CEQA Guidelines. The following is an abbreviated and excerpted summary of this definition:

1. A resource listed in, or determined eligible by the State Historical Resources Commission for listing in, the CRHR.

2. A resource included in a local register of historical resources or identified as significant in an historical resource survey is presumed historically significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR.

CEQA applies to archaeological resources when (1) the archaeological resource satisfies the definition of a historical resource or (2) the archaeological resource satisfies the definition of a "unique archaeological resource." A unique archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

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

Appendix G of the State CEQA Guidelines provides a set of sample questions that guide the evaluation of potential impacts with regard to cultural resources.

The State CEQA Guidelines also address tribal cultural resources (TCRs), which are defined in Section 21074 as "sites, features, places, cultural landscapes, sacred places or objects with cultural value to a California Native American Tribe." They may include archaeological resources. California Native American Tribes include those tribes included among the contacts maintained by the Native American Heritage Commission (NAHC) and may include tribes that are not federally recognized.

Health and Safety Code, Sections 7050 and 7052

Health and Safety Code Section 7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbance must cease and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except under authority of law.

California Public Resources Code Section 5097.9–5097.991

PRC Section 5097.98, as amended by AB 2641, establishes a process in the event Native American Human remains are encountered during project implementation. Section 5097.91 instituted the NAHC, whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.9 of the PRC, a state policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or

irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property. Section 5097.98 of the PRC specifies a protocol requiring the NAHC, upon notification by a county coroner, to designate and notify a Most Likely Descendant regarding the discovery of Native American human remains. Once the Most Likely Descendant has been notified, they then have 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

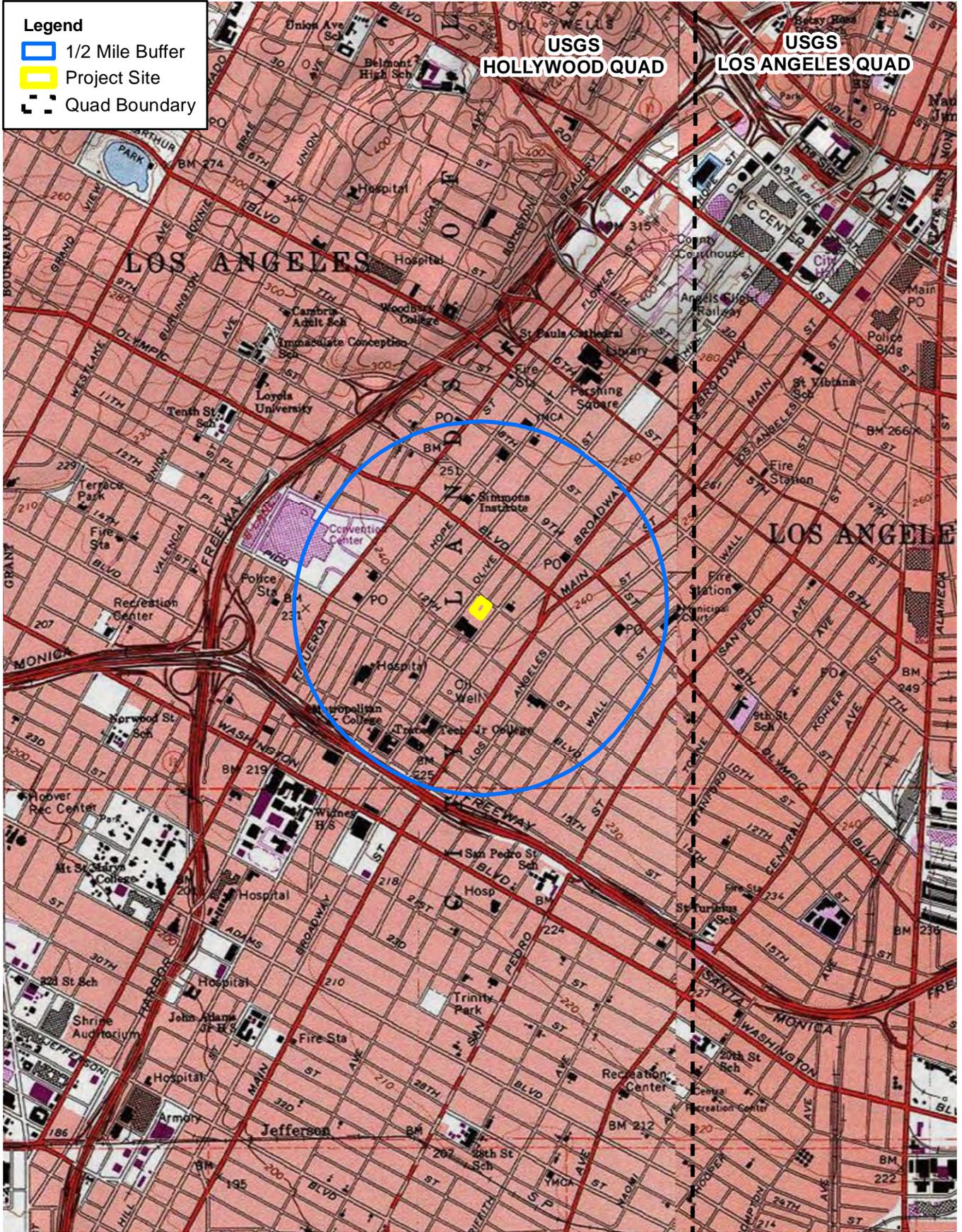
Society for Vertebrate Paleontology Guidelines

The Society of Vertebrate Paleontology (SVP) has established guidelines for the identification, assessment, and mitigation of adverse impacts on nonrenewable paleontological resources.² Most practicing paleontologists in the nation adhere closely to the SVP's assessment, mitigation, and monitoring requirements outlined in these guidelines, which were approved through a consensus of professional paleontologists and are the standard. The SVP outlined criteria for screening the paleontological potential of rock units (High, Undetermined, Low) and established assessment and mitigation procedures tailored to such potential.

² Society of Vertebrate Paleontology. 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Available: http://vertpaleo.org/Membership/Member-Resources/SVP_Impact_Mitigation_Guidelines.aspx.

Legend

-  1/2 Mile Buffer
-  Project Site
-  Quad Boundary

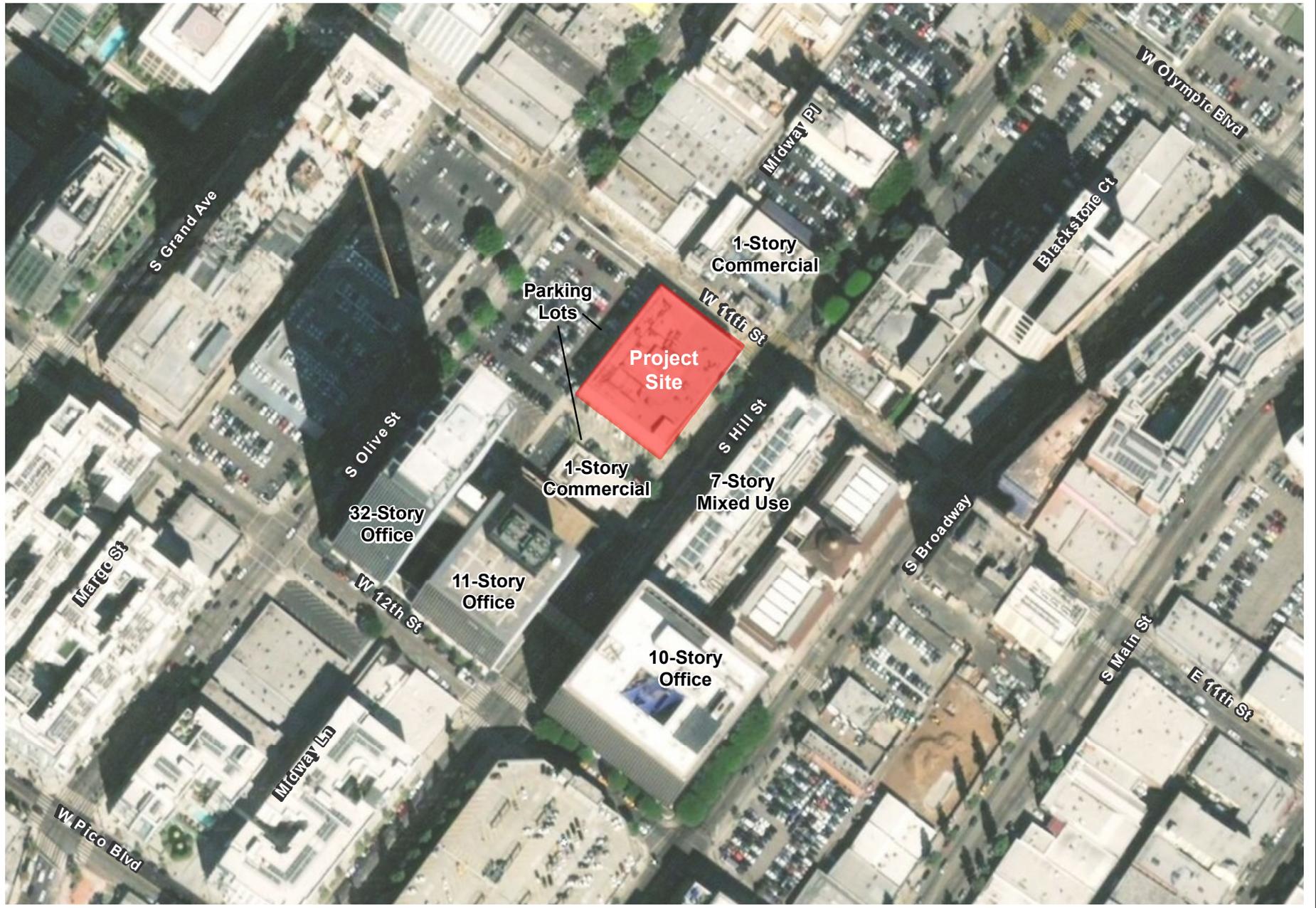


V:\DC\PROJECTS\1111 South Hill St - 1101\Images\Doc\Cultural\FigXX_RecordSearch.mxd, User: 373937, Date: 3/31/2020



Record Search Map
1111 South Hill Street Project

\\PDC01TR05GIS\Projects\110\APPERS\Hill St_110\Figures\Doc\Fig02_ProjectVicinity_2.mxd; User: 25119; Date: 1/29/2019



0 100 200 Feet

Figure 2-2
Aerial Photograph of the Project Vicinity

This page intentionally left blank.

2.1 Environmental Setting

The project site is in a relatively flat area of downtown Los Angeles, within the western portion of the Los Angeles Plain. The Los Angeles Plain is a broad, level expanse of land comprising more than 800 square miles (2,072 square kilometers) that extends from Cahuenga Peak south to the Pacific coast, and from Topanga Canyon southeast to the vicinity of Aliso Creek. Prior to historical settlement of the area, the plain was characterized by extensive inland prairies and a lengthy coastal strand, with elevations approximately 500 feet (152.4 meters) above mean sea level or less. The Los Angeles Plain is traversed by several large watercourses, most notably the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana Rivers. Marshlands fed by fresh or salt water also once covered many portions of the area. To the west, the coastal region encompasses approximately 375 square miles (971 square kilometers) of varied terrain. West of Topanga Canyon the terrain is rugged; the steep westward slopes of the Santa Monica Mountains reach 1,000 feet (304.8 meters) or more in elevation, except where stream-cut ravines and canyons drain onto narrow beaches at the water's edge. From Topanga Canyon southward to the Palos Verdes Peninsula, a distance of roughly 22 miles (35.4 kilometers), the coast is flat and level. Extensive marshlands once existed near the mouth of Ballona Creek in the area now known as Playa del Rey. The terrain becomes rugged once again as the coast follows the Palos Verdes Peninsula for a distance of approximately 12 miles (19.3 kilometers) before reaching San Pedro Bay, which in prehistoric times was characterized by extensive mud flats and sand bars.³

2.2 Cultural Setting

2.2.1 Prehistoric Background

The prehistoric occupation of Southern California is divided chronologically into four temporal phases or horizons.⁴ Horizon I, or the Early Man Horizon, began at the first appearance of people in the region (approximately 12,000 years ago) and continued until approximately 5,000 B.C. Although little is known about these people, it is assumed that they were semi-nomadic and subsisted primarily on game.

Horizon II, also known as the Millingstone Horizon or Encinitas Tradition, began around 5000 B.C. and continued until approximately 1500 B.C. The Millingstone Horizon is characterized by widespread use of milling stones (manos and metates), core tools, and few projectile points or bone and shell artifacts. This horizon appears to represent a diversification of subsistence activities and a

³ McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. A Malki Museum Press/Ballena Press Cooperative Publication. Malki Museum Press, Morongo Indian Reservation, Banning, California or Ballena Press Publishers' Services, Novato, California. pp. 55-72

⁴ Moratto, Michael J. 1984. *California Archaeology*. San Diego: Academic Press. pp. 158-159.

more sedentary settlement pattern. Archaeological evidence suggests that hunting became less important and that reliance on collecting shellfish and vegetal resources increased.⁵

Horizon III, the Intermediate Horizon or Campbell Tradition, began around 1500 B.C. and continued until approximately A.D. 600–800. Horizon III is defined by a shift from the use of milling stones to increased use of mortar and pestle, possibly indicating a greater reliance on acorns as a food source. Projectile points become more abundant and, together with faunal remains, indicate increased use of both land and sea mammals.⁶

Horizon IV, the Late Horizon, which began around A.D. 600–800 and terminated with the arrival of Europeans, is characterized by dense populations; diversified hunting and gathering subsistence strategies, including intensive fishing and sea mammal hunting; extensive trade networks; use of the bow and arrow; and a general cultural elaboration.⁷

2.2.2 Ethnographic Background

The project area is situated within the territory of the Gabrieleno Native American people.⁸ The Gabrieleno are characterized as one of the most complex societies in native southern California, second perhaps only to the Chumash, their coastal neighbors to the northwest. This complexity derives from their overall economic, ritual, and social organization.^{9,10}

The Gabrieleno, a Uto-Aztecan (or Shoshonean) group, may have entered the Los Angeles Basin as recently as 1500 B.P. In early protohistoric times, the Gabrieleno occupied a large territory including the entire Los Angeles Basin, and the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 residential communities with populations ranging from 50 to 150 individuals. The Gabrieleno had access to a broad and diverse resource base. This wealth of resources, coupled with an effective subsistence technology, well developed trade network, and ritual system, resulted in a society that was among one of the most materially wealthy and culturally sophisticated cultural groups in California at the time of contact.

Near the project area, Portola's expedition passed through a large Gabrieleno settlement on the west bank of the Los Angeles River known as Yaanga (alternatively spelled Yangna) on August 2, 1769. The precise location of Yaanga is uncertain because the original community was abandoned sometime prior to 1836.¹¹ Covered today by downtown Los Angeles, no trace of this settlement has likely been visible for more than 130 years.¹² Dillon believes that Yaanga was likely located slightly

⁵ Moratto, p. 159.

⁶ Moratto, p. 159.

⁷ Moratto, p. 159.

⁸ Bean, Lowell J., and C. R. Smith 1978 Gabrieleno. In *California*, edited by R. F. Heizer, pp. 538–549. Handbook of North American Indians, Vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

⁹ Bean, Lowell J., and C. R. Smith, p. 538.

¹⁰ Kroeber, A. L. 1925 *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin No.78. Washington, DC: Smithsonian Institution.

¹¹ Robinson, W. W. 1952 *The Indians of Los Angeles: Story of the Liquidation People*. Dawson's Books, Los Angeles., p. 16.

¹² Dillon, B. D. 1994 *Alameda District Plan, Los Angeles, California: Prehistoric and Early Historic Archaeological Research*. On file, South Central Coastal Information Center, California Historical Resources Information System, University of California, Los Angeles., p. 29.

to the south of the old Spanish Plaza of Pueblo de Los Angeles, near where Bella Union Hotel was later built¹³ on Main Street above Commercial Street.¹⁴

2.2.3 Historic Background

European Discovery and the Mission Period

Spanish occupation of California began in 1769, at San Diego, followed by Mission San Gabriel which was established not long after in 1771. Soon after that, the Los Angeles Pueblo was established as a civilian settlement at the behest of the Spanish royal governor on September 4, 1781. Thus, the city of Los Angeles began as the Los Angeles Pueblo.

Situated near abundant water sources, fertile soils and diverse ecosystems, the Los Angeles Pueblo occupied approximately 28-square miles of the current downtown Los Angeles.¹⁵ The incipient community of the pueblo consisted of 11 families invited by the Spanish governor of California, Felipe de Neve in 1777. However, from the initial eleven families, only eight of them remained and are now considered the true founders of the City of Los Angeles.¹⁶ An important event for the development of the Pueblo was the construction of a water conveyance system, starting initially with the Zanja Madre (Mother Ditch), which transported water from Los Angeles River to the various field and domestic dwellings of the town. Mexico began its war of independence against Spain in 1810. By 1821 Mexico, including California, achieved independence. Soon after that, in 1833, Mexico declared an end to the Missions and began the immediate secularization of the Mission's land holdings.

The Mexican Period

The transition to the Mexican Period was with various socioeconomic changes that brought a rapid and complete cessation to the Mission system. The most impactful element of this transition was the granting of over 500 grants which liquidated the entire property of the Missions in the state of California.¹⁷ Subsequently, after enduring violence and forced communal labor during the Mission, now the Native Americans were left completely abandoned and with no means of subsistence. In 1846, California governor Pío Pico authorized the sale of remaining mission land to raise money to defend Mexican California from an inevitable American takeover.

The American Period

The neighborhood where the project site is located today is commonly referred to as South Park, encompassing the area roughly bounded by 8th Street to the north, the Santa Monica Freeway to the south, Main Street to the east, and the Harbor Freeway to the west. However, the name "South Park" is a more recent name created probably for redevelopment marketing of the neighborhood; historically, it was not referred to as South Park.¹⁸ The essential characteristics of the grid-like

¹³ Dillon, p. 30.

¹⁴ Newmark, Harris 1916 *Sixty Years in Southern California: 1853-1913*. Knickerbocker Press, New York. P. 25-26

¹⁵ Gumprecht, B., 1997. 51 Miles of Concrete: The Exploitation and Transformation of the Los Angeles River. *Southern California Quarterly*, 79(4), pp.431-486.

¹⁶ Poole and Ball 2002:10

¹⁷ Carey McWilliams, *Southern California: An Island on the Land* (Salt Lake City: Peregrine Smith, 1946), 38

¹⁸ ICF 2018, *Restoration of Historic Streetcar Service in Downtown Los Angeles*

system of downtown Los Angeles were developed through the vision of the city's first land surveyor, Lieutenant Edward O.C. Ord, in 1849.¹⁹ By the 1850's, the entire Los Angeles basin was considered as the number one wine producing place in the nation, housing more than 100 vineyards, which was all made possible mainly due to the successful Zanja system.²⁰ Urbanization was slow for the areas south of Third Street and South Park remained a middle-class residential neighborhood until the 1880s when it evolved into an area characterized by medical, commercial and retail businesses during the twentieth century.

¹⁹ W.W. Robinson, et al., "Story of Ord's Survey: As Disclosed by the Los Angeles Archives," *The Quarterly: Historical Society of Southern California* 19.3 (Sept.-Dec. 1937): 121-131.

²⁰ Gumprecht, B., 1997. 51 Miles of Concrete: The Exploitation and Transformation of the Los Angeles River. *Southern California Quarterly*, 79(4), pp.431-486.

Chapter 3

Literature Review and Results

This section describes the research and field methods used to identify and evaluate cultural resources in the study and to assess the project's possible impacts on identified cultural resources.

3.1 Research Methods

ICF conducted general and property-specific archival research to establish a historic context for the study area and inform the identification and analysis of cultural resources. Resources consulted included the previous cultural resources studies and records found during a formal literature review/records search, as well as primary and secondary resources from local repositories, including maps and photographs. A request for a record search was sent to SCCIC on April 6, 2020. A fossil localities search was requested from the Natural History Museum of Los Angeles County (NHMLAC) on April 17, 2020, for the project area. In addition, NAHC was contacted to conduct a review of its Sacred Lands File.

A pedestrian survey was not conducted because the project area is completely developed or paved over.

3.2 Archival Research

ICF conducted a literature review to determine if the project would have the potential to adversely affect prehistoric and historical archaeological resources, thus requiring the consideration of avoidance and minimization. Various online aerial photographs of the region from NETR Online²¹ were inspected that go back as far as 1948. A more complete picture of the project site development history can be found in the Historical Resource Technical Report²² prepared by GPA Consulting for this project. The information is summarized in the paragraph below.

In the end of the 19th Century and the beginning of the 20th Century, various domestic structures were located within the project site as shown in Sanborn Fire Insurance maps from 1888 and 1894. However, these structures were demolished to make room for several one-story commercial buildings in 1913. Then again in 1954, these were demolished for the construction of the current two-story building, which was initially associated with the *Los Angeles Herald-Examiner*. It is worth noting that the structure was built to sustain the addition of various floors above the initial two. In addition, a tunnel was built underneath the structure to the printing room located across Hill Street at 1108 S. Hill Street.

An offshoot of the *zanja* system, namely Zanja No. 8, was located a block east from the project site, between Olive Street and Charity Street (now Grand Avenue). This section of the *zanja* system, branched off the Zanja Madre south of Requena Street, somewhere near Temple Street and First

²¹ Nationwide Environmental Title Research (NETR) Online. 2018. Historic Aerials. Available: historicaerials.com.

²² GPA Consulting. 2020, Historical Resource Technical Report

Street, flowing near Pershing Square, and then continuing in a southwesterly direction along Olive Street.^{23 24} The northernmost segment of Zanja No. 8 was converted to a 16-inch unreinforced concrete pipe in 1888²⁵; however, the southern segments were always depicted as open ditches in various maps. To facilitate the increase in demand for water in the western areas of downtown, another branch, Zanja 8-R (also known as the Woolen Mill Ditch Zanja) was added in the 1870s. This zanja flowed along Flower Street, several blocks west of the project site. Due to the low slope, the increasing cost of upkeep, and the construction nearby of the Zanja No. 8-R, these segments of the Zanja No. 8, which include the portions that existed in the vicinity of the project site, were abandoned around 1870.²⁶

3.3 Record Search Results

An archaeological records search was conducted at the SCCIC, housed at California State University, Fullerton, on April 6, 2020. The searches included reviews of all known relevant cultural resource survey reports to ascertain the presence of known prehistoric and historic archaeological resources within a 0.5-mile radius of the of the project site. An official SCCIC response was received on May 27, 2020 (see Appendix C). The record search revealed no archaeological resources have been recorded in either the project area or within the 0.5-mile radius of the project site. A total of 46 cultural resource studies have been conducted within a 0.5-mile radius of the project site, with one of them conducted within a portion of the study area. However, no archaeological resources were found within the 0.5-mile radius in any of the aforementioned studies. No pedestrian survey was conducted for this study, as the project site is fully developed.

3.3.1 Previous Studies

A total of 46 cultural resource studies have been conducted within the half-mile radius of the project site (see Table 1). All these reports were listed in the SCCIC records.

Table 1. Cultural Resources Surveys Conducted within 0.5 Mile of the Project Site

Number	Authors/Year	Report Title
LA-00483	Greenwood, Roberta S./1978	Archaeological Resources Survey the Proposed Downtown People Mover Project Corridor Area
LA-03103	Greenwood, Roberta S./1993	Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1
LA-04467	Hatheway, Roger G. and Richard Starzak/1983	Architectural and Historical Review of Broadway Seismic List and National Register Theatrical and Commercial District

²³ Layne, J. Gregg 1957. *Water and Power for a Great City*. Los Angeles: Department of Water and Power

²⁴ AECOM 2014. *Regional Connector Transit Corridor Zanja Discovery Program: Results of Archival Research (Appendix G)*. Prepared for the *Cultural Resources Monitoring and Mitigation Plan for the Metro Regional Connector Transit Corridor Project*.

²⁵ Hall, William 1888. *Irrigation in California [Southern]. The Second Part of the Report of the State Engineer of California on Irrigation and the Irrigation Question*. Sacramento.

²⁶ Layne 1957, page 21

Number	Authors/Year	Report Title
LA-04559	Duke, Curt/1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 625-07, in the County of Los Angeles, California
LA-04576	Duke, Curt/1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 574-01, County of Los Angeles, California
LA-04577	Duke, Curt/1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 575-01, County of Los Angeles, California
LA-04836	N/A/2000	Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project
LA-04901	Duke, Curt/2000	Cultural Resource Assessment for AT&T Wireless Services Facility Number, R281.1, County of Los Angeles, California
LA-05077	Duke, Curt/2000	Cultural Resource Assessment for Sprint Pcs Facility La35xc768c (Desmond Building), Located in the County of Los Angeles, Ca
LA-05080	Lapin, Philippe/2000	Cultural Resource Assessment for Modifications to Pacific Bell Wireless Facility La 574-01, County of Los Angeles, Ca
LA-06394	Milosfsky, Michali/1990	California Theater, Historic Structures Report
LA-06410	Christy, Juliet L./2001	Archaeological Survey South Central Los Angeles High School No. 3 Los Angeles, California
LA-06438	Duke, Curt/2000	Cultural Resource Assessment for AT&T Wireless Services Facility Number, R280.2, County of Los Angeles, California
LA-06446	Mason, Roger D./2000	Proposed AT&T Wireless Services Facility: 7th Hill (r282) in the City of Los Angeles, Los Angeles County, California
LA-06449	Bonner, Wayne H./2002	Cultural Resources Survey Report for an AT&T Wireless Services Telecommunications Facility: Cell Site 7th Hill (r282) in the City of Los Angeles, Los Angeles County, California Section 106 Historic 701 S. Hill Street Los Angeles
LA-06451	Duke, Curt/2000	Cultural Resource Assessment for Pacific Bell Wireless Facility Sm 006-02, County of Los Angeles, California
LA-06453	Duke, Curt/2002	Cultural Resource Assessment Cingular Wireless Facility No. Sm 139-02 Los Angeles County, California
LA-06460	Duke, Curt and Judith Marvin/2002	Cultural Resource Assessment Cingular Wireless Facility No. Sm204-02, Los Angeles County, California
LA-08013	McKenna, Jeanette A./2006	Cultural Resources Investigations for the Proposed City House Los Angeles (LLC), and the Olympic on Grand (LLC) Properties in the City of Los Angeles, Los Angeles County, California
LA-08019	Galvin, Andrea/2004	Historic Architectural Survey and Section 106 Compliance for a Proposed Wireless Telecommunications Service Facility Located on a Commercial Building at 1147 Julian Street in the City of Los Angeles, (Los Angeles County), California
LA-08263	Wood, Catherine M./2007	Archaeological Survey Report for the New Carver Apartments Project Located at 325 W. 17th Street, Los Angeles, California
LA-08753	Bonner, Wayne H./2006	Cultural Resources Records Search Results and Site Visit for T-Mobile Candidate La03101d (1240 Main Street), 1240 South Main Street, Los Angeles, Los Angeles County, California

Number	Authors/Year	Report Title
LA-08760	Bonner, Wayne H./2006	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate Sv11002h (Cameron), 1349 South Flower Street, Los Angeles, Los Angeles County, California
LA-09154	Leaver, Ryan C.	Direct APE Historic Architectural Assessment for T-Mobile Candidate SV11002F (Pico/Flower), 1315 South Flower Street, Los Angeles, Los Angeles County, California
LA-09539	Bonner, Wayne H./2008	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11003K (Telacu Plaza), 1033 South Hope Street, Los Angeles, Los Angeles County, California
LA-09544	Bonner, Wayne, Sarah Williams, and Kathleen A. Crawford/2008	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11002I (Edwards Building), 1200 South Hope Street (also known as 430 12th Street), Los Angeles, Los Angeles County, California
LA-10127	Chattel, Robert/1996	California Lutheran Hospital (California Hospital Medical Center) Los Angeles, California Historic and Contemporary Photographs
LA-10262	Bonner, Wayne, Arabesque Said, and Kathleen Crawford	Cultural Resource Records Search and Site Visit Results for Clearwire Candidate CA- LOS5988A / CA5629 (Basement Clothing), 1200 S. Hope St., Los Angeles, Los Angeles County, California.
LA-10507	Anonymous/1983	Technical Report - Historical/Architectural Resources - Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report
LA-10542	Grimes, Teresa/1998	Historical Architectural Survey and Evaluation Report and Finding of no Adverse Effect
LA-10772	Hatheway, Roger/1979	Historic Building Survey - Los Angeles Downtown People Mover Program Report for Determination of Eligibility
LA-10816	Robinson, Mark C./2006	Archaeological Survey Report for the YWCA Job Corps Urban Campus Project 1016-1038 Olive Avenue, Los Angeles, California
LA-10860	Robinson, Mark/2007	Exposition Corridor Light Rail Transit Project Construction Phase Cultural Resources Monitoring and Treatment Plan
LA-10981	Hatoff, Brian/2010	Verizon Cellular Communications Tower Site - AEG Petroleum Building, 714 West Olympic Boulevard, Los Angeles, CA 90015 - Results of Architectural History Survey for Verizon Cellular Communications Tower Site
LA-10982	Hatoff, Brian/2010	Verizon Cellular Communications Tower Site - ABM Industries IBR, 1150 South Olive Street, Los Angeles, CA 90015
LA-11495	Loftus, Shannon/2011	Cultural Resource Records Search and Site Survey, AT&T Site LA0465A, White Building Billboard, 1625 South Broadway Los Angeles, Los Angeles County, California 90015. CASPR#3551017349
LA-11649	Kaplan, David and O'Connor, Pam/2004	Evaluation of Proposed Demolition of Stationers Building, 525 South Spring Street, Stationers Annex, 523 South Spring Street on the Spring Street Financial Historic District
LA-11679	Loftus, Shannon/2011	Cultural Resource Records Search and Site Survey, AT&T Site LAC301, Downtown 404 1/2 West 7th Street, Los Angeles, Los Angeles County, California 90014

Number	Authors/Year	Report Title
LA-12045	Bonner, Wayne/2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02204A (SM204 816 South Grand), 816 South Grand Avenue, #818 Los Angeles, Los Angeles County, California
LA-12172	Bonner, Wayne and Crawford, Kathleen/2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA03619A (SC619 Emil Brown Building), 300 East 9th Street, Los Angeles, Los Angeles County, California
LA-12174	Bonner, Wayne and Crawford, Kathleen/2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV110021 (11002 Edward Building) 1200 South Hope Street, Los Angeles, Los Angeles County, California
LA-12177	Bonner, Wayne and Crawford, Kathleen/2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11003K (Telacu Square) 1033 South Hope Street, Los Angeles, Los Angeles County, California
LA-12179	Bonner, Wayne and Crawford, Kathleen/2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02139A (SM139 1601 Los Angeles St) 1601 Los Angeles Street, Los Angeles, Los Angeles County, California
LA-12584	Rogers, Leslie/2013	Restoration of Historic Streetcar Service in Downtown Los Angeles
LA-12965	Green, Alexis/2016	Submission Packet, FCC Form 621, for proposed Collocation Project, 808 South Flower Street, Los Angeles, Los Angeles County, California 90017 DLA104, EBI Project Number: 6115005143
LA-13239	Gust, Sherri/2017	Extent of Zanja Madre

3.4 Geologic Map Review and Paleontological Records Search

Geology reports and a geologic map of the area were examined with the purpose of assessing the project site's paleontological sensitivity. The project site and its immediate vicinity are underlain by younger Quaternary Alluvium deposits (late Holocene), which are described as "unconsolidated gravel, sand and silt, in active or recently active streambeds."²⁷ These deposits have a low sensitivity for encountering fossils, at least in the uppermost layers. The younger deposits are too young to contain fossils, but the underlying older Quaternary deposits may contain significant vertebrate fossils. Thus, paleontological sensitivity increases with depth of excavation.

A fossil localities search was requested from the NHMLAC on April 17, 2020, for the project area. The NHMLAC responded on April 21, 2020, saying that it had no recorded fossil localities in the project footprint (see Appendix D). The entire proposed project area site has surface deposits composed of younger Quaternary Alluvium, derived as overbank deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel approximately 1.8 miles to the east.

²⁷ Yerkes, Robert F., and Russell H. Campbell. 2005–2019, Preliminary Geologic Map of the Los Angeles 30' x 60' Quadrangle, Southern California, page 6.

However, fossil specimens have been encountered in the immediate vicinity of the project. LACM 1755 is a vertebrate fossil locality from older Quaternary deposits, immediately south of the project site near the intersection of Hill Street and 12th Street, that produced a fossil specimen of horse, *Equus*, at a depth of 43 feet below the street. Another vertebrate fossil locality, near Gramercy Place, which is approximately 3 miles west of the Project Site, produced fossil specimens of mammoth, *Mammuthus*, and bison, *Bison antiquus*.

The NHMLAC advised that deeper excavations in the proposed project area that extend down into older Quaternary sediments may well encounter significant vertebrate fossils. Therefore, any substantial excavations in the proposed project area should be closely monitored to recover any potential vertebrate fossils quickly and professionally without impeding project development.

Sacred Lands File Search

ICF contacted NAHC on April 6, 2020, to request a search of its Sacred Lands File. NAHC responded with a letter dated on April 14, 2020, that the search of the Sacred Lands File yielded negative results (see Appendix B).

This page intentionally left blank.

5.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines the project would have a significant environmental impact under CEQA related to historical resources if it would:

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

In addition, the project would have a significant environmental impact on archaeological and/or paleontological resources if it would:

- Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5; or
- Disturb human remains, including those interred outside of formal cemeteries.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Section 5097.5 of the PRC prohibits any excavation, removal or destruction of “archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” In addition, PRC 30244 requires any development that might adversely impact paleontological resources to implement reasonable mitigation measures for the protection of said resources.

5.2 Discussion of Potential Impacts

The discussion below addresses potential direct and indirect impacts of the project on CEQA cultural and paleontological resources.

5.2.1 Archaeological and Tribal Cultural Resources

The project would not be expected to result in significant impacts on archaeological and tribal cultural resources related to a substantial adverse change in the significance of a prehistoric archaeological resource. There are no known previously recorded archaeological resources (see Appendix C) or TCRs (see Appendix B) within the proposed project area. Although a branch of the *zanja* system flowed in the vicinity of the project area (see section 3.2 of this report), the project is expected to have no direct impact on this cultural resource, as this section of the *zanja* was an open ditch that was abandoned before the urbanization of the South Park neighborhood. Any surviving elements of this ephemeral cultural resource would have been spatially constrained to the width of the ditch itself (outside the project side), and it would have been lost during the development of the

neighborhood. Therefore, the project is not expected to cause a substantial adverse change in the significance of an archaeological resource. Based on the historical disturbance and construction of the area, the sensitivity for intact, buried archaeological deposits of historic age within the project area is relatively low.

5.2.2 Paleontological Resources

Due to its relatively significant depth and the presence of fossils in the immediate vicinity of the project site, the project might result in significant impacts on paleontological resources. There are no known previously recorded paleontological localities (see Appendix D) within the proposed project site. Older Quaternary deposits almost certainly underlie the younger Quaternary Alluvium. Deeper excavations that extend down into older Quaternary deposits may encounter significant fossil vertebrate remains.

The proposed excavations for building foundations are expected to be up to 45 feet in depth and occur mostly within the younger Quaternary Alluvium deposits. These deposits are assigned a low paleontological sensitivity, but because ground-disturbing activities are projected in relatively deeper deposits, additional studies or paleontological monitoring are recommended for the project. The excavations associated with the project are expected to reach a maximum depth of approximately 45 feet, which could be well beyond the deeper younger Quaternary Alluvium deposits. In addition, the presence of vertebrate fossil localities immediately south of the project site raises the paleontological sensitivity of the area.

Chapter 6

Conclusions and Recommendations

6.1 Conclusions

This technical report fully evaluated the potential for adverse effects on cultural and paleontological resources within the 1111 South Hill project area. A study area was established for the project to consider the potential for both direct and indirect impacts of the project on cultural and paleontological resources, as defined by CEQA. Three CEQA-defined resources were considered in this study: (1) archaeological resources; (2) TCRs; and (3) paleontological resources.

No archaeological resources, or TCRs were identified within the study area as a result of this analysis. However, fossil localities have been identified in the areas immediately southwest of the project site, which indicates an elevated paleontological sensitivity.

6.2 Recommendations

Because the project is in an extensively developed urban environment on a previously disturbed site, the potential to encounter either prehistoric or historical archaeological resources is considered low. Archaeological materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock as well as historical resources such as glass, metal, wood, brick, or structural remnants. However, if unanticipated archaeological resources are encountered during ground-disturbing activities, the City of Los Angeles will contact a qualified archaeologist to evaluate and determine appropriate treatment for the resource.

The proposed excavations for building foundations are expected to be up to 45 feet in depth and occur mostly within younger Quaternary Alluvium deposits. These deposits are assigned a low paleontological sensitivity, but because ground-disturbing activities are projected in relatively deeper deposits, additional studies or paleontological monitoring are recommended for the project. If fossils are encountered during ground-disturbing activities, this report recommends that the Project comply with proposed mitigation measure MM-GEO-1, which would reduce potentially significant unforeseen impacts to a less-than-significant level.

If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Construction must halt in the area of the discovery of human remains, the area must be protected, and consultation and treatment should occur as prescribed by law.

6.2.1 Conditions of Approval and Mitigation Measures

Per California Public Resources Code Section 21083.2(f), a lead agency may make provisions for archeological sites accidentally discovered during construction. The Project Applicant would be

required to comply with the City's standard condition of approval related to inadvertent discovery of unknown archaeological resources. In the event that any subsurface cultural resources are encountered at the projects site during construction or the course of any ground disturbance activities, all such activities shall halt immediately. 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 the California Public Resources Code Section 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. Compliance with this condition would ensure that Project impacts related to unknown archaeological resources would be less than significant.

If human remains are encountered during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition, pursuant to PRC Section 5097.98. If the county coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains. With regulatory compliance, any potential significant impacts of the Project related to this threshold would be less than significant.

The City shall retain the services of a qualified Native American monitor(s) if unanticipated TCRs are encountered during construction activities. The determination of what constitutes a potential TCR shall be the responsibility of the City. Selection of the appropriate Native American monitor shall be based on ongoing consultation under AB 52. If evidence of any prehistoric subsurface archaeological features or deposits (e.g., lithic scatters, midden soils) is discovered during construction-related earthmoving activities, all ground-disturbing activity in the area and within 50 feet of the find shall be halted until a qualified archaeologist and Native American representative can assess the significance of the find. If, after evaluation, a resource is considered significant or a TCR, all preservation options shall be considered, as required by CEQA (see PRC Section 21084.3), including possible data recovery, mapping, capping, or avoidance of the resource. Upon discovery of any TCR, if the City determines that the Project may cause a substantial adverse change to a TCR, the City will work with the consulting tribe(s) to employ measures that treat the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource.

Mitigation Measure MM-Geo-1: Conduct Paleontological Resource Monitoring

A qualified paleontologist shall review the paleontological records search prepared by the Los Angeles County Natural History Museum and review existing literature for the proposed project area. The following additional measures shall be designed to recover remains before they are lost or destroyed.

- All ground-disturbing activities associated with project construction occurring within previously undisturbed fossil bearing formations shall be monitored by a qualified paleontologist or qualified paleontological monitor. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Los Angeles County, and who has worked as a paleontological monitoring

project supervisor in the County for at least 1 year. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials, and works under the direction of a qualified paleontologist.

- A qualified paleontologist shall attend preconstruction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, all on-site construction personnel shall receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work.
- If fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time; however, some fossil specimens, such as a complete large mammal skeleton, may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovering of small fossil remains, such as isolated mammal teeth, it may be necessary to set up a screen-washing operation on site.
- Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued.
- Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the NHMLAC.
- A final data recovery report shall be completed that outlines the results of the monitoring program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

This page intentionally left blank.

Appendix A
Resume of Author

This page intentionally left blank.

DR. EUGEN “GINO” RUZI

Project Manager / Archaeologist

Eugen “Gino” Ruzi, associate archaeologist at ICF, has more than ten years of experience in the field of archaeology including project management, test pit excavation, structure excavation, large-scale pedestrian surveys, data recovery, artifact analysis, research, laboratory procedures, and extensive experience in museum operations. He has directed many projects involving research of museum collections and excavation data, and has curated various exhibitions in museums in Los Angeles, California; Buffalo, New York; and Tirana (Albania). Gino has cooperated with diverse groups of researchers in projects located in the greater Los Angeles area, Mojave Desert, Western New York, Turkey, Albania, and Greece.

At ICF, Gino manages the archaeological and paleontological monitoring efforts for several large-scale infrastructure projects within highly sensitive downtown Los Angeles. He is responsible for staffing, team coordination, resource identification and documentation, report generation, and the QA/QC of subordinate documentation. He has conducted multiple pedestrian surveys, testing and evaluation, and archaeological data recovery.

Project Experience

Transportation and Cultural Resource Management

Regional Connector Metro Project (Contract EN075 and Contract PS20111) — Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles, CA, 07/2015–present

Project Manager/Archaeological/Paleontological Monitoring Coordinator. Serves as Monitoring Coordinator for archaeological and paleontological resources, making sure that the provisions under the project MMRP, CRMMP, and PMMP are implemented correctly. He is responsible for coordinating with construction management, Metro representatives and various DBE subcontractors. Is involved in various consultation efforts regarding the Los Angeles Zanja System conservation and construction crew training. Manages the day-to-day operations of the project, including coordination, scheduling, reporting, documentation, recordation, monitor training, and other duties. This project is expected to continue through 2020.

Crenshaw/LAX Metro Project (Contract EN075 and Contract PS20111) — Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles, CA, 04/2015–present

Project Manager/Archaeological/Paleontological Monitoring Coordinator. Coordinates the monitoring efforts for cultural and paleontological resources during construction. Synchronizes



Years of Experience

- Professional start date: 07/1/2008
- ICF start date: 06/2017

Education

- PhD, Anthropology, University at Buffalo, 2019
- MA, Anthropology, University at Buffalo, 2012
- BA, Anthropology, CSU Long Beach, 2008

Professional Memberships

- Society of California Archaeology
- Society of American Archaeology
- American Institute of Archaeology
- Institute for European and Mediterranean Archaeology

Certifications/Other

- Registered Professional Archaeologist (RPA), NO. 34833471, Issue date: 6/22/2015
- HAZWOPER

monitoring efforts with Native American monitors. Monitored during various phases of construction, throughout the APE, including areas of high archaeological and paleontological sensitivity. Recovered fossils and other paleontological data, following the methods laid out by the project PRMTP. Received various safety training pertaining to construction sites. This project is expected to continue through 2020.

Patsaouras Plaza/ El Monte Busway Metro Project (Contract EN075 and Contract PS20111) — Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles, CA, 06/2017–present

Archaeological/Paleontological Monitoring Coordinator. Coordinates the monitoring efforts for cultural and paleontological resources during construction. Synchronizes monitoring efforts with Native American monitors. Monitored during various phases of construction, throughout the APE, including areas of high archaeological and paleontological sensitivity. Recovered fossils and other paleontological data, following the methods laid out by the project PRMTP. Received various safety training pertaining to construction sites. This project is expected to continue through 2020.

Keeler Dunes Dust Control Project — Great Basin Unified Air Pollution Control District, Keeler, CA, 04/2015–05/2016

Archaeological Monitor. Served as monitor of archaeological resources for a large landscape alteration project in the Mojave Desert, administered by the U.S. Department of the Interior, BLM. This position requires working with Native American Tribal Representatives and the Bureau of Land Management in an effort to effectively mitigate for cultural resources.

UB Archaeological Survey (multiple projects) — State University of New York, Buffalo, NY, 04/2012–05/2014

Field Archaeologist. Participated in all Phase 1-3 archaeological projects throughout New York State (Phase I archaeological surveys (mapping and site recording); Phase II archaeological testing and evaluation; Phase III archaeological data recovery). The employment involved working in many diverse projects, including large land development surveys (STAMP Project in Alabama NY), NYSDOT managed highway projects (Downgrading the Scajaquada Expressway (Route 198)), historical site evaluation (Theodore Roosevelt Inaugural Home), excavation and exhumation of human remains (Erie County Poorhouse Cemetery Project) and others. Responsible for all the aspects of fieldwork, including: keeping of field notes and photos, the operation of portable GPS units, excavation of test pits, and communication with construction crews, and interest groups, including Native American monitors.

Southern Albania Neolithic Archaeological Project (SANAP) — University of Cincinnati and Tirana University, Albania. 07/2010–05/2015

Ceramic Specialist and Excavation Supervisor. Coordinated the budget and project plan of work for the ceramic analysis activities. Designed and implemented strategies for the analysis of ceramic artefacts. Supervised activities related to pottery classification and analysis. Conducted inventories and researched reference publications. Utilized various characterization equipment (LA-ICP-MS, XRF and FTIR) housed at the IIRMES laboratory (CSU Long Beach). Used a variety of multivariate statistical methods to compile and interpret gathered data. Prepared reports, publications, and presentations on the results of different analyses

Publications

Ruzi, Eugen (contributor), et al. New Light on the Early Neolithic Period in Albania: The Southern Albania Neolithic Archaeological Project (SANAP), 2006-2013. Pp. 107-119 In L. Perzhita, I. Gjipali, G. Hoxha, and B. Muka, eds., Proceedings of the International Congress of Albanian Archaeological Studies. Tirana: Center for Albanian Studies, Institute of Archaeology. 2014.

Ruzi, Eugen. Investigating Compositional Variability among Early Neolithic Ceramics from Korça Region, Albania. *Chronika* 3:1-15. Buffalo, NY. 2013

Ruzi, Eugen. Review of *The Statues that Walked: Unraveling the Mystery of Easter Island*, by Terry Hunt and Carl Lipo. *Chronika* 3:98-101. Buffalo, NY. 2013

Ruzi, Eugen and Hector Neff. Compositional Variability in the Albanian Neolithic, Copper and Bronze Age Pottery. Conference Proceedings of the 73rd Annual Meeting of Society for American Archaeology (SAA), March 2008 Vancouver, Canada. The SAA Press. 2008

Training, Lecturing, and Presentations

Ruzi, Eugen. Inter-settlement Interaction and Cultural Change in Early Neolithic Communities in Albania. AIA/SCS Joint Annual Meeting, New Orleans. January 2015

Ruzi, Eugen. Technological Variation in the Early Neolithic Pottery in the Korça Region, Albania. IEMA Brown Bag Lecture. Buffalo, NY. March 2013

Ruzi, Eugen (session organizer). Session: Theories of Archaeological Science. Theoretical Archaeology Group (TAG-USA) International Conference. Buffalo NY. May 2012

Ruzi, Eugen. Investigating Compositional Variability among Early Neolithic Ceramics from SE Albania. Theoretical Archaeology Group (TAG-USA) International Conference. Buffalo NY. 2012

Ruzi, Eugen. Albania's First Villages. IEMA Research and Travel Scholarship Lecture. Buffalo, NY. September 2011

Ruzi, Eugen. Exploring Albania's Neolithic: Excavation and Archaeometry. IEMA Brown Bag Lecture. Buffalo NY. March 2011

Ruzi, Eugen (poster). Compositional Variability in the Albanian Neolithic, Copper and Bronze Age Pottery. 73rd Annual Meeting of Society for American Archaeology (SAA), March 2008

Recognition and Commendations

"...He's done an excellent job of coordinating the field crews, ensuring Metro remains in compliance at all times. He's been exceedingly helpful in ensuring the day-to-day operations on the project continue, even with the grueling 7-day, day-and-night schedule. He's also done a great job in ensuring finds are properly recorded and reported, and keeping myself and the paleontologists informed. In addition, he's established an excellent working relationship with representatives of the client, ranging from construction crews to the Project Manager..." Marc Beherec (AECOM), PHD, RPA

Employment History

ICF, Jones and Stokes. Archaeologist – Project Coordinator. Los Angeles, CA. 06/2017 – Present.

Sapphos Environmental Inc. Archaeological Resources Coordinator – Project Manager. Pasadena, CA. 04/2015 – 06/2017.

American Museum of Ceramic Art (AMOCA). Assistant Curator. Pomona, CA. 05/2014 – 05/2015.

UB Archaeological Survey. Field Archaeologist. Buffalo, NY. 04/2012 – 05/2014 (intermittently).

Anderson Gallery. Collection Curator – Teaching Assistant, Buffalo, NY. 06/2012–05/2014 (part-time)

SUNY at Buffalo Anthropology Department (UB). Program Coordinator – Office Coordinator. Buffalo, NY. 08/2010–06/2012

This page intentionally left blank.

Appendix B
NAHC Response, April 30, 2019

This page intentionally left blank.

NATIVE AMERICAN HERITAGE COMMISSION

April 14, 2020

Nuri Cho
City of Los Angeles

Via Email to: nuri.cho@lacity.org

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, 1111 S. Hill Street Project, Los Angeles County

Dear Mr. Cho:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Joseph Myers
Pomo

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,



Steven Quinn
Cultural Resources Analyst

Attachment

Appendix C
SCCIC, Record Search Result Letter, May 16, 2019

This page intentionally left blank.

South Central Coastal Information Center

California State University, Fullerton
Department of Anthropology MH-426
800 North State College Boulevard
Fullerton, CA 92834-6846
657.278.5395 / FAX 657.278.5542

sccic@fullerton.edu

California Historical Resources Information System
Orange, Los Angeles, and Ventura Counties

5/27/2020

Records Search File No.: 21304.7406

Eugen (Gino) Ruzi
ICF
555 West 5th Street, suite 3100
Los Angeles, CA 90013

Re: Records Search Results for the 1111 South Hill Street Project

The South Central Coastal Information Center received your records search request for the project area referenced above, located on the Hollywood, CA USGS 7.5' quadrangle. Due to the COVID-19 emergency, we have temporarily implemented new records search protocols. With the exception of some reports that have not yet been scanned, we are operationally digital for Los Angeles, Orange, and Ventura Counties. See attached document for your reference on what data is available in this format. The following reflects the results of the records search for the project area and a ½-mile radius:

As indicated on the data request form, the locations of archaeological resources and reports are provided in the following format: custom GIS maps shape files hand-drawn maps

Archaeological Resources project area: 0	None
Archaeological Resources within ½-mile radius: 0	None
Reports within project area: 1	LA-12584
Reports within ½-mile radius: 45	SEE GIS SHAPES

- Resource Database Printout (list):** enclosed not requested nothing listed
- Resource Database Printout (details):** enclosed not requested nothing listed
- Resource Digital Database (spreadsheet):** enclosed not requested nothing listed
- Report Database Printout (list):** enclosed not requested nothing listed
- Report Database Printout (details):** enclosed not requested nothing listed
- Report Digital Database (spreadsheet):** enclosed not requested nothing listed
- Resource Record Copies:** enclosed not requested nothing listed
- Report Copies:** enclosed not requested nothing listed
- OHP Built Environment Resources Directory (BERD) 2019:** available online; please go to https://ohp.parks.ca.gov/?page_id=30338
- Archaeo Determinations of Eligibility 2012:** enclosed not requested nothing listed
- Los Angeles Historic-Cultural Monuments** enclosed not requested nothing listed

Historical Maps: enclosed not requested nothing listed
Ethnographic Information: not available at SCCIC
Historical Literature: not available at SCCIC
GLO and/or Rancho Plat Maps: not available at SCCIC
Caltrans Bridge Survey: not available at SCCIC; please go to
<http://www.dot.ca.gov/hq/structur/strmaint/historic.htm>
Shipwreck Inventory: not available at SCCIC; please go to
http://shipwrecks.slc.ca.gov/ShipwrecksDatabase/Shipwrecks_Database.asp
Soil Survey Maps: (see below) not available at SCCIC; please go to
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the [California Historical Resources Information System](#),

Michelle Galaz
Assistant Coordinator

Enclosures:

(X) Emergency Protocols for LA, Orange, and Ventura County BULK Processing Standards – 2 pages

(X) GIS Shapefiles – 46 shapes

Emergency Protocols for LA, Orange, and Ventura County BULK or SINGLE PROJECT Records Searches IF YOU HAVE A GIS PERSON ON STAFF ONLY!!

These instructions are for qualified consultants with a valid Access and Use Agreement.

WE ARE ONLY PROVIDING DATA THAT IS ALREADY DIGITAL AT THIS TIME.

Some of you have a fully digital operation and have GIS staff on board who can process a fully digital deliverable from the Information Center. IF you can accept shape file data and do not require a custom map made for you by the SCCIC, and you are willing to sort the data we provide to you then these instructions are for you. Read further to be sure. You may have only one project at this time or some of you have a lot of different search locations that can be processed all at once. This may save you a lot of time getting results back and if we process your jobs in bulk, and you may enjoy significant cost savings as well.

Bulk processing will work for you if you have a GIS person on staff who can sort bulk data for you and make you any necessary project maps. This type of job can have as many job locations as you want but the point is that we will do them in bulk – at the same time - not one at a time. We send all the bulk data back to you and you sort it. This will work if you need searches in LA, Orange, or Ventura AND if they all have the same search radius and if all the other search criteria is the same– no exceptions. This will not work for San Bernardino County because we are not fully digital for San Bernardino County. You must submit all your shape files for each location at the same time and this will count as one search. If you have some that need a different radius, or different search criteria, then you should submit that job separately with its own set of instructions.

INSTRUCTIONS FOR BULK PROCESSING:

Please send in your requests via email using the data request form along with the associated shape files and pdf maps of the project area(s) at 1-24k scale. PDFs must be able to be printed out on 8.5X 11 paper. We check your shape file data against the pdf maps. This is where we find discrepancies between your shape files and your maps. This is required.

Please use this data request form and make sure you fill it out properly.

<http://web.sonoma.edu/nwic/docs/CHRISDataRequestForm.pdf>

DELIVERABLES:

1. A copy of the Built Environment Resources Directory or BERD for Los Angeles, Orange, Ventura, or San Bernardino County can now be found at the OHP Website for you to do your own research. This replaces the old Historic Properties Directory or HPD. We will not be searching this for you at this time but you can search it while you are waiting for our results to save time.
2. You will only get shapefiles back, which means that you will have to make your own maps for each project location.

3. You will get a bulk processed bibliographies for resources and reports as selected; you will not get individual bibliographies for each project location.
4. You will get pdfs of resources and reports if you request them, provided that they are in digital formats. We will not be scanning records or reports at this time.
5. You will get one invoice for the bulk data processing. We can't bill this as individual jobs on separate invoices for you. If there are multiple project names, we are willing to reference all the job names on the invoice if needed. If there a lot of job id's we may ask you to send them in an email so that we can copy and paste it into the invoice details. If you need to bill your clients for the data, you can refer to our fee schedule on the OHP website under the CHRIS tab and apply the fees accordingly.
6. We will be billing you at the staff rate of \$150 per hour and you will be charged for all resources and report locations according to the "custom map charges". This is in lieu of the \$12 per GIS shape file data fee that we normally charge for GIS files and this will only apply during the Covid 19 emergency. You will also be billed 0.15 per pdf page, or 0.25 per excel line as is usual.
7. Your packet will be mailed to you on a CD or via Dropbox if you have an account. We use 7-zip to password protect the files so you will need both. We email you the password.

I may not have been able to cover every possible contingency in this set of instructions and will update it if necessary. You can email me with questions at sccic@fullerton.edu

Thank you,

Stacy St. James

South Central Coastal Information Center

Los Angeles, Orange, Ventura, and San Bernardino Counties

This page intentionally left blank.

Appendix D

**Paleontological Record Search Response Letter,
McLeod, Samuel, Natural History Museum of Los
Angeles County, Los Angeles, CA, May 6, 2019**

This page intentionally left blank.

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org



Vertebrate Paleontology Section
Telephone: (213) 763-3325

e-mail: smcleod@nhm.org

21 April 2020

ICF International
555 West Fifth Street, Suite 3100
Los Angeles, CA 90013

Attn: Gino Ruzi, Ph.D., Senior Archaeologist

re: Paleontological Resources for the proposed 1111 Hill Street Project, in the City of Los Angeles, Los Angeles County, project area

Dear Gino:

I have conducted a thorough search of our Vertebrate Paleontology records for the proposed 1111 Hill Street Project, in the City of Los Angeles, Los Angeles County, project area as outlined on the portion of the Hollywood USGS topographic quadrangle map that you sent to me via e-mail on 17 April 2020. We do not have any vertebrate fossil localities that lie directly within the proposed project boundaries, but we do have localities nearby from the same sedimentary deposits that occur at depth in the proposed project area.

The entire proposed project area site has surface deposits composed of younger Quaternary Alluvium, derived as overbank deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel just to the east. These younger Quaternary deposits usually do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older Quaternary deposits found at varying depths may well contain significant vertebrate fossils.

Our closest vertebrate fossil locality from the older Quaternary deposits is LACM 1755, immediately south of the proposed project area near the intersection of Hill Street and 12th Street, that produced a fossil specimen of horse, *Equus*, at a depth of 43 feet below the street. Our next closest vertebrate fossil locality in older Quaternary Alluvium is LACM 1893, almost due west

of the proposed project area in a cut for the Santa Monica Freeway (I-10) just east of Gramercy Place, that produced fossil specimens of mammoth, *Mammuthus*, and bison, *Bison antiquus*. Our next closest vertebrate fossil locality from older Quaternary deposits beneath the younger Quaternary Alluvium is probably LACM 2032, northeast of the of the proposed project area near the intersection of Mission Road and Daly Street around the Golden State Freeway (I-5), that produced fossil specimens of pond turtle, *Clemmys mamorata*, ground sloth, *Paramylodon harlani*, mastodon, *Mammuthus americanum*, mammoth, *Mammuthus imperator*, horse, *Equus*, and camel, *Camelops*, at a depth of 20-35 feet below the surface. The pond turtle specimens from locality LACM 2032 were figured in the scientific literature by B.H. Brattstrom and A. Sturn (1959. A new species of fossil turtle from the Pliocene of Oregon, with notes on other fossil *Clemmys* from western North America. Bulletin of the Southern California Academy of Sciences, 58(2):65-71). At our locality LACM 1023, just north of locality LACM 2032 near the intersection of Workman Street and Alhambra Avenue, excavations for a storm drain recovered fossil specimens of turkey, *Meleagris californicus*, sabre-toothed cat, *Smilodon fatalis*, horse, *Equus*, and deer, *Odocoileus*, at unstated depth. A specimen of the turkey, *Meleagris*, from this locality was published in the scientific literatus by D. W. Steadman (1980. A Review of the Osteology and Paleontology of Turkeys (Aves: Meleagridinae). Contributions in Science, Natural History Museum of Los Angeles County, 330:131-207).

Shallow excavations in the younger Quaternary Alluvium exposed throughout the proposed project area are unlikely to uncover significant fossil vertebrate remains. Deeper excavations in the proposed project area that extend down into older Quaternary deposits, however, may well encounter significant vertebrate fossils. Any substantial excavations in the proposed project area, therefore, should be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,



Samuel A. McLeod, Ph.D.
Vertebrate Paleontology

enclosure: invoice