

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Project. Historical resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section is based on information provided in Appendix C of this Draft EIR, which includes the *Historical Resources Technical Report – 4th and Central Project, Los Angeles*, prepared by Historic Resources Group (HRG), dated November 2022 (Historical Report), in Appendix C-1, and the *Fourth & Central Project, City of Los Angeles, California, Archaeological Resources Assessment*, prepared by ESA, dated November 2022 (Archaeological Report), in Appendix C-2.

2. Environmental Setting

a) Regulatory Framework

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

- The National Historic Preservation Act of 1966, as amended
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- Archaeological Resources Protection Act
- Archaeological Data Preservation Act
- California Environmental Quality Act
- California Register of Historical Resources

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

(1) Federal

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

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment”.¹ The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.²

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

¹ 36 Code of Federal Regulations (CFR) 60.

² United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

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

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district's significance and historic integrity determine its boundaries. Other factors include:

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

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

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

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

(i) Criteria

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

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

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

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

(ii) Context

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

(iii) Integrity

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

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

(iv) Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance

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

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

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

criteria discussed above, and possess integrity as defined above.⁸ Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.⁹ The full list of Criteria Considerations is provided below:

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

(b) Secretary of the Interior's Standards

The National Park Service issued the Secretary of the Interior's Standards for the Treatment of Historic Properties with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction.¹⁰ The most applicable guidelines should be used when evaluating a project for compliance with the Secretary of the Interior's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary of the Interior's Standards for

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

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

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

Rehabilitation provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.¹¹

It is important to note that the Secretary of the Interior's Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining

¹¹ United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

(c) *Archaeological Resources Protection Act*

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

(d) *Archaeological Data Preservation Act*

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

(2) State

(a) *California Environmental Quality Act*

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

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the

CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.¹² If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.¹³

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired”.¹⁴ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

¹² California Public Resources Code Section 21083.1(a).

¹³ State CEQA Statute and Guidelines, Section 15064.5(c)(4).

¹⁴ State CEQA Guidelines, Section 15064.5(b)(1).

- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.¹⁵

(b) California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."¹⁶ The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.¹⁷ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

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

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

¹⁵ State CEQA Guidelines, 15064.5(b)(3).

¹⁶ California Public Resources Code, Section 5024.1[a].

¹⁷ California Public Resources Code, Section 5024.1[b].

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

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

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

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

(c) California Health and Safety Code

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

(d) California Public Resources Code

California Public Resources Code (PRC) Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no

descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

(3) Local

(a) *City of Los Angeles General Plan*

(i) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.¹⁸

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

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

(ii) *Central City Community Plan*

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

The City's Central City Community Plan (Community Plan) is the land use element of the General Plan applicable to the Project. The Community Plan includes land use

¹⁸ City of Los Angeles, Conservation Element of the General Plan, 2001, pages II-3 to II-5.

designations, density limits, building heights, and other provisions that support the City’s policies and development vision for the future. Among other planning and land use goals, objectives and policies identified in the Community Plan, regarding historic resources, the following objective and policies related to Arts, Cultural and Architectural History are applicable to the Project:

Objective 10-2: To maintain and reuse one of the largest and most distinguished sets of under used historic buildings in the United States.

Policy 10-2.1: Clearly designate those historic buildings which should be preserved and prioritized for available funding. Encourage both their rehabilitation and/or adaptive reuse and the development of adjacent available sites.

Policy 10-2.6: Encourage the reuse of historic buildings as live/work offices, housing, retail, and educational facilities.

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

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

- The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of with historic personages important to national, state, city, or local history; or
- The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.¹⁹

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

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a “master” architect, builder, or designer?

¹⁹ City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

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

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”²⁰

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

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zone (HPOZs) in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.²¹ Each HPOZ is established with a Historic Resources Survey, a historic

²⁰ City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

²¹ City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.²² For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

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

The City of Los Angeles Historic Resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the

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

eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

b) Existing Conditions

Currently, the Project Site is operated as Los Angeles Cold Storage and is developed with cold storage facilities that include warehouse and wholesale commercial buildings and associated office space, truck loading docks, and surface parking. The existing buildings on the Project Site total approximately 360,734 square feet of floor area.

The North Site is currently developed with a six-story over basement cold storage warehouse building (LACS Building), and an attached single-story warehouse building (North Wing), which is treated as a separate building for purposes of the historic analysis. The LACS Building was constructed in two phases, which are referred to herein as the “East Volume” and the “West Volume”. The East Volume was completed in 1903. It was designed by architects Theodore Eisen and George Wyman of Eisen & Wyman and was constructed as a six-story, brick masonry building. The West Volume, a six-story reinforced concrete addition, was designed by architect George Wyman and constructed by expert reinforced concrete builder Carl Leonardt in 1907. The East and West Volumes collectively comprise the LACS Building and constitute a single building. The LACS Building is Industrial Vernacular in style with Neoclassical details. The North Wing was designed by architect Herman Goodman and completed in 1985. Note that the LACS Building’s use and operation as a cold storage facility over the last 100 years involves sub-zero temperatures and freezer/refrigeration equipment. These activities would cease with development of the Project, resulting in a thaw/defrosting of the interior of the LACS Building. The South Site is currently developed with the one-to-two story Central Warehouse; the one-story Main Office; and the one-to-two story Astro Warehouse. The Industrial Vernacular Central Warehouse was designed by Vincent Palmer & Associates and constructed by G. O. Gartz Construction Company in 1958. The Central Warehouse was originally a one-story, reinforced concrete building; a partial second story was added in 1989. The Main Office is an Industrial Vernacular, one-story, concrete masonry building, built by G. O. Gartz Construction Company in 1969. The Astro Warehouse is an Industrial Vernacular, single-story concrete building, with a partial second story, designed

by architect and engineer McLean & Schultz in 1969. The South Site also includes 47 loading docks and paved surface parking that serves the warehouse uses.

The West Site provides 39 parking spaces in a fenced, paved lot and is not improved with any buildings.

Figure II-3, *Existing On-Site Uses*, in Chapter II, *Project Description*, illustrates the existing buildings and uses on the Project Site.

(1) Historical Resources

The following is a summary of data more fully presented in the Historical Report provided in Appendix C-1 of this Draft EIR.

(a) *Central City Community Plan Area*

The buildings on the Project Site were constructed between 1903 and 1985 in the Central City East neighborhood of the Central City Community Plan Area (CPA) of the City of Los Angeles. The Central City East neighborhood is generally located to the east of the Historic Core and to the south of Little Tokyo. Spanning an area that encompasses Skid Row, the Toy District, and adjacent industrial zones, the Central City East neighborhood contains a combination of industrial and institutional uses. Notably, it contains many Single-Room Occupancy (SRO) hotels, social service facilities, and warehousing sites that are associated with food processing. The Central City East neighborhood served as the City's industrial core beginning in the late 19th and early 20th centuries. Development in this area is of a notably lower scale than in other parts of the CPA.

(i) *Industrial Development*

The period between the end of Reconstruction in 1877 and the beginning of the Great Depression in 1929 was one of overall rapid expansion and industrialization in the United States. Industrial development in the City began in earnest at the turn of the twentieth century. Specifically, industrial development was transforming the blocks east of Main Street. This area had historically been occupied by a mix of agricultural land and working-class neighborhoods, but the presence of new railroad depots, warehouses, and yards along Alameda Street and Central Avenue had paved the way for industrial development nearby in the early twentieth century.

Between the end of the nineteenth century and 1914, the City's population had grown from 50,000 to nearly 550,000 people. Continued population growth in the 1910s and 1920s sustained additional economic development and introduced many other industrial uses to the blocks east of the central business district. The area's identity as an industrial center was solidified by a zoning change in 1922, which eliminated new residential uses from Downtown.

The City's burgeoning industrial core featured a range of warehouses and storage facilities as well as a wide variety of processing and manufacturing operations by the early 20th century. This area continued to serve as the City's primary industrial center until World War

It with most of the industrial buildings constructed in the 1910s and 1920s. One instrumental industry in the area's growth was the concentration of cold storage and ice plants. The nucleus of these plants was centered immediately west of the Los Angeles River.

(ii) *Cold Storage*

Early growth of the City of Los Angeles' cold storage industry mirrored that of other cities in the country. As the urban population grew, inhabitants in rapidly expanding city centers had limited access to fresh produce. As a result, fresh products were increasingly in demand in urban areas. The introduction of refrigeration increased the longevity of perishable goods. Thus, the cold storage industry grew alongside urbanization, providing a critical link between agricultural goods from farms, fisheries, and ranches and their distribution to fresh produce markets and food processors.

Use of the refrigerated railway boxcar to transport goods resulted in a concentration of industrial development (including cold storage facilities) around packing houses and rail depots. Early cold storage facilities were grouped on Central Avenue (between Fourth and Sixth Streets) and on Santa Fe Avenue (between First and Fourth Streets), and later in more urbanized areas, as well as at the Los Angeles Harbor.

Early important cold storage facilities in the City located in proximity to the Santa Fe rail line included Los Angeles Ice and Cold Storage Company (located on the Project Site), National Ice and Cold Storage Company, and Merchants' Ice Company. The Los Angeles Ice and Cold Storage Company (now known as Los Angeles Cold Storage) was originally established in 1895. In 1902, the company expanded with a new six-story plant located at the corner of Fourth Street and Central Avenue (referred to herein as the East Volume of the LACS Building).²³ At the time, the company was the primary supplier of refrigeration to many produce markets, hotels, and buildings in greater Los Angeles.

In 1925, the City of Los Angeles had more cubic feet of cold storage acre per capita than any other city in the country, over 5,000,000 cubic feet of capacity. By 1926, the growth of Los Angeles as a consuming and distributing center, combined with the popular reception of modern cold storage facilities, had exceeded expectations of the local cold storage industry; in response, ice making and cold storage facilities such as Federal Cold Storage Company expanded their operations at that time. In 1927, a new Los Angeles Produce Terminal with about 100 storerooms and room for 300 producers, was formally dedicated in the Central Manufacturing District, an important element of the larger development of that area.

Starting in the 1930s, the widespread use of home refrigerators lessened the need for large-scale ice production. As a result, cold storage facilities housing ice making and cold storage shifted their operations to focus more on cold storage services. By 1960, Los Angeles Cold

²³ "Quarter of a Million Dollar Enterprise," *Los Angeles Times*, November 8, 1902, 1.

Storage had sold its ice production plants and moved out of the ice business, focusing entirely on cold storage and warehouse services for nationwide customers.

With the rise of globalization in the 1970s, strong international ties ensured widespread transfer of produce, helping foster long-term industry viability. In addition, the availability of computer systems gained widespread industry use in the 1980s as an essential means of communication between warehouses and depositors and enabling facilities to more effectively catalog stored goods and keep track of items coming and going, enabling them to accommodate a great variety of products. Facilities could also more accurately track the length of stay of a particular good and charge fees accordingly, essential for managing the large variety of products today's cold storage facilities tend to store. There are still large concentrations of cold storage facilities in or near their historic locations, although the extent of remaining historic fabric is limited.

(b) Historical Background of the Project Site

(i) Early Development

The Project Site was historically owned by William Wolfskill, an American-Mexican pioneer, explorer, and agronomist. Wolfskill purchased the land as part of a 100-acre tract in 1837 for use as a vineyard and orchard. He subsequently planted over 32,000 grapevines and cultivated hundreds of orange trees on the land; because of these activities he is often referred to as the “father” of the California citrus industry. Wolfskill built a family home, known as the Wolfskill Adobe, on his land in 1841.

Following William Wolfskill's death in 1866, his son Joseph Wolfskill inherited a large portion of the family's holdings and converted the remaining vineyards into orchards. By the 1870s, Joseph and his brother Louis had improved the land with orange, lime, and lemon trees. Joseph Wolfskill donated a swath of his land, including a portion of the Project Site (South Site), to the Southern Pacific for construction of a new passenger depot.

The Southern Pacific's Arcade Depot (originally known as the Wolfskill Depot) was constructed at the present-day South Site between March and September of 1888. Designed by Arthur Brown, Superintendent of Bridges and Buildings Department for the Central Pacific Railroad, the monumental Romanesque-style wood depot featured a steeply pitched roof and turrets.

When the Los Angeles Ice and Cold Storage Company sought a location for a new warehouse, it settled on the property at the corner of 4th Street and Central Avenue (North Site), immediately northwest of the Arcade Station. This location facilitated the holding, shipping, and importing of perishable goods that would require refrigeration and the production of ice. In 1902, the Los Angeles Ice and Cold Storage Company purchased the lot from Joseph Wolfskill, and the earliest building on the North Site was completed in 1903.

By 1906, much of the former Wolfskill orchards were developed with lodging houses, warehouses, residences, laundromats, and commercial buildings. Over a half-dozen

hotels, including the Palm House, Arcade Hotel, and The Boneita, were built immediately west of the Arcade Depot. Railroad tracks traversed the east side of the South Site, bringing and shipping perishable goods, many of which were preserved at the new Los Angeles Ice and Cold Storage facility (LACS Building). South Central Avenue was improved with multi-storied buildings dedicated to commerce, produce, manufacturing, and food markets.

(ii) *North Site*

Initial construction of the LACS Building (East Volume) began in 1902. The East Volume was designed by architects Theodore Eisen and George Wyman of Eisen & Wyman, as a six-story brick masonry building. The East Volume was completed in 1903 and was used to refrigerate food goods as well as furs, woolen fabrics, carpets, rugs, and furniture. Shortly after its completion, architect George Wyman designed an addition to the original building which expanded the LACS Building to the west, to Central Avenue (West Volume). In 1907, construction of the West Volume was completed.

In 1928, the LACS Building was reinsulated. The parapets were braced to conform with City code in 1954. In 1959, a dock and metal canopy were added to the south side of the LACS Building. That same year, the truck loading area to the west of the LACS Building was converted to a cold storage room. In 1965, a brick office building was added to the south of the LACS Building next to the loading dock. In 1967, the loading dock to the south of the LACS Building was updated with a cement slab for a compression room. The LACS Building (East and West Volumes) underwent several repairs in the 1990s. In 1992, the LACS Building was seismically retrofitted. This included the application of shotcrete to the wall between the East Volume and the West Volume.

The North Wing was constructed in 1985. It is located immediately to the north of the LACS Building and serves as the loading dock for the LACS Building. The North Wing was designed by Herman Goodman. Building permits do not identify any subsequent alterations to the North Wing. Refer to Chapter 8.0, *Site History*, in the Historical Report, as provided in Appendix C-1 of this Draft EIR, for additional details on the setting and alterations to the buildings on the North Site.

(iii) *South Site*

The Central Warehouse is located on the South Site. Designed by Vincent Palmer & Associates and constructed by G.O. Gartz Construction Company in 1958. The building was constructed of red concrete brick and had a 20-million-pound capacity. A Certificate of Occupancy for the building was issued on June 16, 1958. In 1968, a restroom was added to the dock office. In 1989, the Central Warehouse was altered with a partial second-story addition, which encompassed the entire building except for small sections along the east and south façades.

The Main Office is located at the northwestern corner of the South Site. It was completed by engineer H.M. Hansen and contractor G.O. Gartz Construction Company in 1969. A

building permit in 1993 called for the demolition of the Main Office and relocation of offices to the Central Warehouse; this work was not completed.

The Astro Warehouse is situated east of the Main Office and north of the Central Warehouse and connects the two on the South Site. It was designed by architect and engineer McLean & Schultz in 1969. Its purpose was listed as a cold storage warehouse and office. Parking spaces were relocated to the west of the building in 1970. The interior of the building, including the finishing for the first-floor warehouse and second floor offices, was completed by contractor Willard-Brent incrementally from 1970 to 1972. A platform for equipment was constructed on the roof of the Astro Warehouse in 2001. In 2008, a building permit was issued for the building to be re-roofed. A building permit was issued in 2016 for the reinforcement of two damaged roof beams with new steel beams. Refer to Chapter 8.0, *Site History*, in the Historical Report, as provided in Appendix C-1 of this Draft EIR, for additional details on the setting and alterations to the buildings on the South Site.

(iv) *West Site*

The West Site is currently vacant except for a paved surface parking lot. It was previously improved with residential buildings in the early 20th century; at least one of these residences was moved to another site in 1913. Buildings owned and operated by Young's Market Co. were constructed on the West Site in the early-twentieth century, with improvements and additions completed through the 1920s. These buildings served as food processing facilities associated with the market across the street. In 1979, the industrial buildings were demolished. The West Site was paved and has been used as a surface parking lot since at least 1995. Refer to Chapter 8.0, *Site History*, in the Historical Report, as provided in Appendix C-1 of this Draft EIR, for details regarding the West Site.

(c) *Historic Resources Identified on Project Site*

As previously indicated, SurveyLA is the City of Los Angeles' citywide survey of historic resources, conducted in accordance with the standards and guidelines set forth by the National Park Service and the California State Office of Historic Preservation, and overseen by the City's Office of Historic Resources. SurveyLA completed in August 2016, identified the LACS Building as eligible for listing in the National Register, California Register, and as a City HCM.

The LACS Building was evaluated as eligible under the Industrial Development, 1850-1980 context; Agricultural Roots, 1850-1945 theme; From Farm to Market, 1900-1960 sub-theme; and Cold Storage Warehouse property sub-type. The LACS Building was identified as an "excellent example of an early 20th century cold storage warehouse in Downtown Los Angeles" that "played an important role in the distribution of agricultural goods and locally-sourced food products." Thus, the LACS Building was found eligible for designation at the federal, state, and local levels under Criteria A/1/1, and assigned the Status Codes 3S, 3CS, and 5S3. These Status Codes identify the building as appearing

eligible for listing in the National Register, California Register, and as a City HCM through survey evaluation.²⁴

The LACS Building was also evaluated as eligible for its architectural merit, as an “excellent example of a vernacular industrial building designed by master architects Eisen and Wyman.” Thus, the LACS Building was found eligible for designation at the federal, state, and local levels under Criteria C/3/3, and assigned the Status Codes 3S, 3CS, and 5S3.

SurveyLA did not identify any of the other buildings on the Project Site as potentially significant. SurveyLA assigned a Status Code of 7SQ to the other buildings on the Project Site, including the North Wing, Main Office, Astro Warehouse, and Central Warehouse. This Status Code identifies each as an “individual property assessed for significance in accordance with SurveyLA but does not meet eligibility standards.” Therefore, the other buildings on the Project Site were found ineligible for federal, state, or local listing by SurveyLA.

The industrial buildings on the Project Site were re-evaluated in the Historical Report using relevant themes in the SurveyLA HCS, according to eligibility criteria and integrity thresholds for listing in the National Register, the California Register, and as City HCMs. Based on the analysis therein, the Historical Report confirmed that the Central Warehouse, Main Office, and Astro Warehouse on the South Site are ineligible for designation at the federal, state, or local levels. The Historical Report also confirmed the SurveyLA finding that the six-story LACS Building on the North Site is eligible for designation at the federal, state, and local levels. As such, the LACS Building is considered a historical resource as defined by CEQA in the Historical Report and in this Draft EIR analysis. Contributing components to the LACS Building are limited to the East Volume (1903) and West Volume (1907). The 1959-1967 alterations and the North Wing, constructed in 1985, were completed outside of the period of significance for the cold storage property type. As such, they do not reflect an early 20th century industrial development pattern and they are not significant architecturally. Therefore, these later additions to the North Site do not contribute to the significance of the LACS Building.

Refer to Chapter 10.0, *Evaluation of Historical Resources on the Project Site*, in the Historical Report, as provided in Appendix C-1 of this Draft EIR, for a detailed discussion and evaluation of the North Site’s historic eligibility against the applicable criterion and status codes referenced above, as well as the character defining features that contribute to the LACS Building historic designations.

²⁴ City of Los Angeles, Department of City Planning, Office of Historic Resources, Historic Resources Survey Report: Central City Community Plan Area, prepared by Architectural Resources Group, September 2016.

(d) Other Identified Resources in the Project Vicinity

The Project Site is located in the vicinity of designated or previously identified potential historical resources. As discussed further in the Historic Report, there are four (4) properties that were identified as potentially individually eligible by SurveyLA in the Project vicinity:

- 333 Central Avenue (Produce Exchange Building) – Located approximately 230 feet from the northwest corner of the North Site. Excellent and rare example of an early 20th century produce brokerage building in Downtown Los Angeles; one of few intact examples of the property type in the area. This building was constructed for the Los Angeles Produce Exchange, which played an important role in facilitating the distribution of locally grown produce. It is not clear how long the building was used as a produce brokerage; more research is needed to determine the period of significance. Status Code: 3S; 3CS; 5S3.
- 529 Central Avenue (Fisherman's Outlet) – Located approximately 320 feet southwest of the southwest corner of the South Site. Significant as a long-term location of a business important to the commercial identity of Downtown Los Angeles. Fisherman's Outlet is a restaurant that has been in continuous operation at this location since 1962. The property appears to meet local criteria only and may not meet significance thresholds for National Register or California Register eligibility. Status Code: 5S3.
- 500 Alameda Street (Valero Gas Station) – Located approximately 235 feet from the southeast corner of the South Site. Rare example of a 1940s service station in Los Angeles' primary industrial district; one of few examples remaining from this period. The service station features large vehicular bays, presumably to accommodate trucks from the adjacent industrial area. Status Code: 3S; 3CS; 5S3.
- 542 Alameda Street (Southern California Gas Co., Stationery & Printing Dept) – Located approximately 500 feet from the southeast corner of the South Site. Excellent example of a 1930 daylight factory building in Los Angeles' primary industrial district. Daylight factories were designed to maximize the amount of light reaching the interior of the building; they are characterized by bays of large industrial sash windows, skylights, or other roof forms that bring in additional light. Status Code: 3S; 3CS; 5S3.

SurveyLA identified two potential historic districts that are located wholly or partially in the Study Area identified by the Historical Report: the Fifth Street SRO Hotel Historic District, and the Downtown Los Angeles Industrial Historic District. The potential Fifth Street SRO Hotel Historic District is located to the south of the West Site. The potential Downtown Los Angeles Industrial Historic District is located to the east of the North and South Sites, across S. Alameda Street. The two potential historic districts are discussed further below:

- Fifth Street SRO Hotel Historic District - The potential Fifth Street SRO Hotel Historic District is located to the west of the South Site, separated by Central Avenue and intervening parcels, and to the southwest of the West Site, separated by two intervening parcels. The closest potential contributors to the Project Site

are approximately 116 feet to the southwest of the West Site. The potential district is small in size and rectangular in shape. It includes parcels on the north side of Fifth Street between Gladys Avenue on the east and Crocker Street on the west. The potential Fifth Street SRO Hotel Historic District was found eligible for listing at the federal, state, and local levels as part of SurveyLA's Central City Survey. According to the *Central City CPA Historic Resources Survey Report*, the potential historic district contains an excellent concentration of early 20th century SRO hotels in Downtown Los Angeles.

- Downtown Los Angeles Industrial Historic District - The western boundary of the potential Downtown Los Angeles Historic District is located to the east of the North and South Sites. The closest potential contributors to the Project Site are separated by the width of Alameda Street (approximately 80 feet) to the east, with the closest Project construction equipment approximately 95 feet away. The potential district is an industrial area situated between the Alameda Street corridor and the Los Angeles River, just east of downtown Los Angeles. The potential district occupies flat terrain generally bounded by 1st Street on the north, Santa Fe Avenue and Mateo Street on the east, 7th Street on the south, and Alameda Street on the west. The potential Downtown Los Angeles Industrial Historic District was found eligible for listing at the federal, state, and local levels as part of SurveyLA's Central City North Survey. According to the *Central City North CPA Historic Resources Survey Report*, the potential historic district is significant for its role in the industrial development of Los Angeles; this area served as the City's primary industrial district from the late-19th century through World War II. The potential district's period of significance is 1900 to 1940, when most of the original buildings in the district were constructed.

(2) Archaeological Resources

The following is a summary of data more fully presented in the Archaeological Report provided in Appendix C-2 of this Draft EIR.

(a) *Natural Setting*

The Project Site is located in a relatively flat area of the western Los Angeles Basin. The Los Angeles Basin is bounded by the Santa Monica Mountains to the northwest, the San Gabriel Mountains to the north, and the San Bernardino and San Jacinto Mountains to the east. The Los Angeles Basin was formed by alluvial and fluvial deposits derived from these surrounding mountains and the Los Angeles River. Prior to urban development and channelization of the Los Angeles River, the Project Site, which is located 200 feet west of the Los Angeles River Channel, was likely covered with marshes, thickets, dense woodland, and grassland. The floodplain forest of the Los Angeles Basin formed one of the most biologically rich habitats in southern California. Willow, cottonwood, and sycamore, and dense underbrush of alder, hackberry, and shrubs once lined the Los Angeles River as it passed near present-day Downtown Los Angeles. Although historically most of the Los Angeles River was dry for at least part of the year, shallow bedrock in the Elysian Park area north of Downtown Los Angeles forced much of the river's underground water to the surface. This allowed for a steady year-round flow of

water through the area that later became Downtown Los Angeles. However, the Project Site is within a completely developed area.

(b) *Prehistoric and Ethnographic Setting*

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

The Project Site is located in a region traditionally occupied by the Gabrielino. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.²⁵ The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison.²⁶ The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leaved cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.²⁷

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.²⁸ The closest villages to the Project Site were the villages of *Geveronga* and *Yaanga*, located along Los Angeles River and approximately 0.50 miles east of the Project Site.²⁹ The Kirkman-Harriman Pictorial and Historical Map of Los

²⁵ A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

²⁶ Lowell J. Bean and Charles R. Smith. "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

²⁷ A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

²⁸ Blake Gumprecht, Los Angeles River: Its Life, and Possible Rebirth (Baltimore: The Johns Hopkins University Press, 2001).

²⁹ McCawley, William. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles, Malki Museum Press, Banning, California.

Angeles County³⁰ depicts the Project Site as located near the convergence of ancient roads and roads established before 1890.

(c) *Historic Setting*

On September 4, 1781, the *Pueblo de la Reina de Los Angeles* was established and consisted of a central square surrounded by 12 houses and a series of agricultural fields occupying 250 acres to the east between the town and the river.³¹ An irrigation system (*Zanja*) that would carry water from the river to the fields and the pueblo was the first priority and was constructed almost immediately. The main ditch – the *Zanja Madre* (Mother Ditch) - was constructed in 1781 and carried water from the Los Angeles River south to the agricultural lands surrounding the pueblo. According to the Archaeological Report, one branch of the *Zanja*, Conduit System (Zanja No. 3) crosses portions of the Project Site (specifically, the West Site). The earliest depiction of Zanja No. 3 is shown in E.O.C. Ord's *Plan de la Ciudad de Los Angeles* from 1849 which shows a ditch branching from the Zanja Madre and following Alameda Street into the vineyards and orchards south of Aliso Street. Zanja No. 3 consisted of an open ditch starting from 1st to 7th Street (encompassing approximately 4,800 feet in length) (see Figure 5 of the Archaeological Report provided in Appendix C-2 of this Draft EIR).³² This portion would have covered the current Project Site. From 7th to 12th Street, Zanja No. 3 consisted of a 22-inch cement pipe (covering approximately 3,200 feet in length) and from 12th Street to the southern portion of the City's boundaries, it was an open ditch again (covering approximately 4,750 feet).³³ A *Map of the City of Los Angeles* created by H.J. Stevenson (1884) depicts Zanja No. 3 crossing the Project Site and located within the William Wolfskill tract (see Figure 6 of the Archaeological Report provided in Appendix C-2 of this Draft EIR). The date of construction of Zanja No. 3 is unknown; however, the Archeological Report indicates that it was built between 1825 and 1831.

On September 30, 1882, the Zanja Committee recommended “that Zanja No. 3 should be abandoned from its place of origin on the Zanja Madre, near the modern intersection of Los Angeles and Alameda Streets [and approximately 0.80 miles north of the Project Site], south to First Street. Instead, water was to be conveyed down the Zanja Madre from Requena Street to First Street and then distributed to Zanja No. 3 south of that point”.³⁴

³⁰ Los Angeles Public Library, Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860-1937, Electronic resource, <https://www.lapl.org/collections-resources/visual-collections/kirkman-harriman-pictorial-and-historical-map-los-angeles>, accessed March 20, 2019.

³¹ Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, 1999, reprinted 2001.

³² Ord, Edward Otho Cresap. 1849. *Plan de la Ciudad de Los Angeles*, surveyed and drawn by E.O.C. Ord, Lt. U.S.A. & Wm. R. Hutton, asst, August 29th, 1849. Los Angeles Public Library.

³³ Hall, William H. 1888. *Irrigation in Southern California. The Field, Water Supply, and Works, Organization and Operation in San Diego, San Bernardino, and Los Angeles Counties. The Second Part of the Report of the State Engineer of California on Irrigation and the Irrigation Question.* Sacramento: State Office, J.D. Young, Supt, State Printing.

³⁴ Berger, Louis & Associates, Inc. 1987. *Zanja No. 3: Brick Culvert, Historic American Engineering Record Documentation at the Proposed Federal Center Complex, Los Angeles, California.* Prepared for U.S. Department of Justice, Federal Bureau of Prisons.

The work was completed on May 19, 1883. Per the Archaeological Report, in 1883, city health officials recommended that the abandoned ditch of Zanja No. 3 between Jackson and First Streets be filled in. After 1883, Zanja No. 3 (south of First Street and crossing portions of the Project Site) continued being used.

Zanja No. 3 was probably abandoned around the turn of the century and was later used as a storm drain before it was removed from service. By 1943, the City Department of Public Works attempted to upgrade Zanja No. 3; however, it was in poor condition and so it was cut by utilities and could not be reused.³⁵

(d) *Archival Research*

As presented in the Archaeological Report (see Appendix C-2 of this Draft EIR), a records search for the Project Site was conducted on August 13, 2021, by staff at the California Historical Resources Information System (CHRIS)- South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all recorded cultural resources and previous studies within the Project Site and a 0.25-mile radius.

(i) *Previous Cultural Resources Investigations*

The CHRIS records search results indicate that 25 cultural resources studies have been conducted within a 0.25-mile radius of the Project Site. Approximately 30 percent of the 0.25-mile records search radius has been included in previous cultural resources assessments. Of the 25 previous studies, one (LA-2950) overlaps the South Site and one (LA-13239) overlaps the North and West Sites.

Study LA-2950 consists of a cultural resources assessment for the *Pacific Pipeline Project* which proposed the construction of 171.7 miles of crude oil pipeline. Archival research and a pedestrian survey were conducted as part of this project, but no resources were recorded within the South Site.

Study LA-13239 includes the shapefile supplied by Sherri Gust of Cogstone. It represents their research into the entire linear boundary of the Zanja Madre. The Study acknowledges that only portions of the Zanja [listed as P-19-172542] have been physically surveyed, excavated, and recorded.³⁶ The Study LA-13239 also includes the Office of Historic Preservation's Built Environment Resources Directory listing which shows the Zanja Madre (P-19-172542) with a National Register status code of 7W. Study LA-13239 depicts the footprint of the Zanja Madre on a topographic map and shows the footprint of Zanja No. 3 as crossing portions of the North and West Sites. However, Cogstone does not provide a source for the zanja alignment. Based on review of maps

³⁵ Berger, Louis & Associates, Inc. 1987. Zanja No. 3: Brick Culvert, Historic American Engineering Record Documentation at the Proposed Federal Center Complex, Los Angeles, California. Prepared for U.S. Department of Justice, Federal Bureau of Prisons.

³⁶ Cogstone, Extent of Zanja Madre (LA-13239), 2017. Report on file at the South Central Coastal Information Center, California State University Fullerton.

from 1884 and 1894, Zanja No. 3 more likely crossed through the West Site only and just outside the North Site, but not directly within it. In particular, an 1894 Sanborn map shown on Figure 9 of the Archeological Report in Appendix C-2 of this Draft EIR depicts the zanja alignment crossing through a portion of the West Site and terminating at a location that is approximately 100 feet to the west of the North Site. Given the location of this terminus point for the zanja and its heading (or direction) that is depicted on both the 1894 Sanborn Map and a separate map from 1884 that depicts the alignment as continuing north (see Figure 6 of the Archeological Report), it does not appear that the zanja crossed through the North Site. No additional information is provided in Study LA-13239 regarding Zanja No. 3.

(ii) *Previously Recorded Cultural Resources*

The records search results indicate that 20 cultural resources have been previously recorded within a 0.25-mile radius of the Project Site. A description of these resources is provided in the Archeological Report in Appendix C-2 of this Draft EIR, and summarized in **Table IV.B-1**, *Summary of Previously Recorded Cultural Resources*.

(iii) *Sacred Lands File (SLF) Search*

The NAHC maintains a confidential SLF database which contains resources of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on July 22, 2021, to request a search of the SLF, in connection with the Project. The NAHC responded to the request in a letter dated August 20, 2021, indicating that the results were positive. The response letter did not provide details on resources within the Project Site, but suggested contacting the Gabrieleño Band of Mission Indians – Kizh Nation. The NAHC also provided a list of other Native American tribes to contact as they may have knowledge of cultural resources within the Project Site. Refer to Section IV.K, *Tribal Cultural Resources*, of this Draft EIR, for further analysis regarding tribal cultural resources.

**TABLE IV.B-1
SUMMARY OF PREVIOUSLY RECORDED CULTURAL RESOURCES**

| P-Number | Permanent Trinomial | Other | Description | Date Recorded | Eligibility |
|-----------------|--------------------------------|---|--|----------------------|--|
| P-19-004460 | CA-LAN-4460H | Block F Site | Historic-period archaeological resource: refuse deposits, structural features and isolated artifacts | 2014; 2016 | Recommended Eligible for NR, CR, and local listing |
| P-19-173220 | - | W. Douglas Lee Bldg | Historic architectural resource: Building | 1983 | 3 |
| P-19-173336 | - | St Francis Xavier Chapel | Historic architectural resource: Building | 1987; 2011 | 4 |
| P-19-173907 | - | Hart Hotel | Historic architectural resource: Building | 1991; 1994 | 6Y4 |
| P-19-173908 | - | St Mark's Hotel | Historic architectural resource: Building | 1991 | 6Y |
| P-19-175845 | - | Salvation Army - Harbor Light Center | Historic architectural resource: Building | 1994 | 6Y4 |
| P-19-175846 | - | Salvation Army - Harbor Light Center | Historic architectural resource: Building | 1994 | 6Y4 |
| P-19-175847 | - | Salvation Army - Safe Harbor | Historic architectural resource: Building | 1994 | 6Y4 |
| P-19-175848 | - | Ellis Hotel | Historic architectural resource: Building | 1994 | 6Y4 |
| P-19-187085 | - | The Mojave Rd | Mojave Road | 1989; 2014 | 1CS |
| P-19-188195 | - | Firestone Tire & Rubber Co, Public Self Storage | Historic architectural resource: Building | 2004; 2011; 2012 | Unknown |
| P-19-188265 | - | Little Tokyo Lofts | Historic architectural resource: Building | 2008 | 3S |
| P-19-190035 | - | La Kretz Innovation Campus | Historic architectural resource: Several buildings within La Kretz Innovation Campus | 2011 | Not Eligible for the NR |
| P-19-190036 | - | La Kretz Innovation Campus | Historic architectural resource: Building | 2011 | 6Y |
| P-19-190037 | - | La Kretz Innovation Campus | Historic architectural resource: Building | 2011 | 6Y |

**TABLE IV.B-1
SUMMARY OF PREVIOUSLY RECORDED CULTURAL RESOURCES**

| P-Number | Permanent Trinomial | Other | Description | Date Recorded | Eligibility |
|-----------------|--------------------------------|---|---|----------------------|----------------------------|
| P-19-190038 | - | La Kretz Innovation Campus | Historic architectural resource: Building | 2011 | 6Y |
| P-19-190289 | - | Rossmore Hotel | Historic architectural resource: Building | 2012 | Not Eligible for the NR |
| P-19-190521 | - | John A. Roebling's Sons Co | Historic architectural resource: Building | 2009 | 3S |
| P-19-190531 | - | Brunswig Drug, Purepac Corporation | Historic architectural resource: Building | 2009 | 6Z |
| P-19-190552 | - | Downtown Los Angeles Street Features | Historic district: Downtown Los Angeles street features (including granite curbs, 1950s air-raid sirens, and ornamental street lighting) | 2009 | 3CS, 3D, and 3CD |

NOTES:

1CS = Listed in the California Register (CR) as individual property by the State Historical Resources Commission (SHRC)

3 = Appears eligible for National Register (NR) to person completing or reviewing form

3CD = Appears eligible for CR as a contributor to a CR eligible district through a survey evaluation

3CS = Appears eligible for CR as an individual property through survey evaluation

3D = Appears eligible for NR as a contributor to a NR eligible district through survey evaluation

3S = appears eligible for NR as an individual property through survey evaluation

4 = Might become eligible for listing on the NR

6Y = Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local listing.

6Y4 = Determined ineligible NR/consensus, appears eligible for Local listing or may become eligible for NR

6Z = Found ineligible for NR, CR or Local designation through survey evaluation.

SOURCE: ESA, 2022.

(iv) *Geoarchaeological Review*

A desktop geoarchaeological review was conducted for the Project as part of the Archaeological Report. The review included a review of geologic maps, geological literature, and archival research through the Natural Resources Conservation Service (NRCS) and the California Geological Survey (CGS) Borehole Database.

As discussed in the Geotechnical Reports prepared for the Project,³⁷ five borings were advanced (B1 through B5) at the three sites, which are underlain by artificial fill over Holocene age alluvial deposits. In general, artificial fill was encountered to a maximum depth of eight feet below ground surface (bgs) at the North Site and to a maximum depth of five feet bgs at the South and West Sites. Due to its recent, human origin, fill is considered to have a lower sensitivity for intact prehistoric archaeological resources, although it is possible for fill to contain historic archaeological resources associated with historic domestic, commercial and industrial activities, potentially including remnants of Zanja No. 3 within the West Site.

Relatively fine-grained Holocene-aged alluvium consisting of fine to medium sand with traces of silt/clay and fine gravel was observed underlying the fill to approximately 18 to 34 feet bgs. These generally fine-grained deposits may represent natural levee deposits, as well as floodplain deposits, laid down as a result of overbank flooding. The proximity to fresh water and riparian resources offered by channel levees may have attracted people for subsistence, if not necessarily sustained occupation.

At greater depths, alluvium included sand with gravel, sand with cobbles, and sand with gravel and cobbles. These coarse-grained matrices are channel bed or lag deposits representing significantly higher-energy fluvial processes. While gravel channel bars may have attracted people in the past, the high flows occurring in these settings make it unlikely for any archaeological sites to have been preserved. As a result, the coarse-grained alluvium within the Project Site is considered to have a lower sensitivity for archaeological sites.

³⁷ Geocon West, Inc, Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, North Site, 715 East 4th Street, 364 South Central Avenue, Los Angeles California, September 13, 2021; Geocon West, Inc., Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, South Site, 730 East 4th Street, 400-464 (even) South Central Avenue, Los Angeles California, September 13, 2021; and, Geocon West, Inc, Preliminary Geotechnical Investigation – Proposed Mixed-Use and High-Rise Development 410 South Central Avenue, West Site, 425, 427, 429, 431, and 433 South Central Avenue, Los Angeles California, September 13, 2021. The Geotechnical Reports are included as appendices to the Initial Study, which is provided in Appendix A of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

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

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

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

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

Under CEQA, and as relates to Threshold (a) above, a significant effect on the environment would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”³⁸ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

According to CEQA Guidelines Section 15064(d)(1-3), in evaluating the significance of the potential environmental effect of a project on historical resources, both direct physical changes to the environment and reasonably foreseeable indirect physical changes are considered:

1. A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.

³⁸ CEQA Guidelines, Section 15064.5(b)(1).

2. An indirect physical change in the environment is a physical change in the environment, which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.
3. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.

As applied to the evaluation of potential impacts to historical resources, direct impacts are those that occur during construction and would include the demolition, material alteration, relocation, or conversion of a historical resource and/or its important character-defining features. Direct impacts may also involve potential damage related to adjacent underground excavation and general construction activities that could undermine the stability of a historical resource. Indirect impacts may involve alteration to the surroundings of a historical resource that could remove part or all of the associated setting of an historical resource, remove character-defining features or spaces surrounding the historical resource, or substantially impair or obscure the ability of the resource to convey its historical significance.

Potential impacts are considered both for historical resources on the Project Site, and the previously identified historical resources located in the Study Area identified by the Historical Report. The Project application materials, plans, elevation drawings, and renderings were used to analyze potential impacts to historical resources. For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate cultural resources impacts are listed below:

(1) Built Environment

- A project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 when one or more of the following occurs:
 - Demolition of a significant resource.
 - Relocation that does not maintain the integrity and 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 (Standards).
 - Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

(2) Archaeological Resources

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory.
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions.
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind.
- Is at least 100 years old and possesses substantial stratigraphic integrity.
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

b) Methodology

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. In general, a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1)). In addition, while assessing a project’s impacts under CEQA, it is important to consider the ability of the historical resources to retain their integrity. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment. This analysis of impacts to historical resources is based on the detailed technical information provided in both the Historical Report provided in Appendix C-1, of this Draft EIR as well as the Archeological Report provided in Appendix C-2, of this Draft EIR.

(1) Historical Architectural Resources

The analysis in this section of the Draft EIR is primarily based on information presented in the Historical Report, included in Appendix C-1 of this Draft EIR. As described in the Historical Report, research was conducted to confirm the development history and provide additional information for the evaluation of potential historic significance of the Project Site. SurveyLA findings were used in the identification of historical resources in the Study Area. The field methods and analysis are based on guidance from the National Park Service, the California Office of Historic Preservation, and the City of Los Angeles Office of Historic Resources for evaluating potential historical resources. Identification of physical features and historic integrity was ascertained during the site visit and through building records. Site visits were conducted on October 4, 2021, and December 6, 2021, to document existing conditions on the Project Site.

(2) Archaeological Resources

The analysis of impacts to archaeological resources is based on the Archeological Report, included in Appendix C-2 of this Draft EIR, which includes: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a 0.25 mile radius of Project Site, as well as a review of cultural resource reports and historic topographic maps on file; (2) a review of the California Register and the National Register; (3) geoarchaeological review; (4) a review of available Sanborn Maps, historic aerial imagery; and, (5) an archaeological resources survey of the Project Site. The archaeological resources survey of the Project Site was conducted on June 28, 2021. The survey was aimed at identifying archaeological resources within or immediately adjacent to the Project Site. As discussed further in the Archeological Report, no visual remnants of archaeological resources, including any remnants of a Zanja No. 3, were observed within the Project Site during the field survey.

The potential for the Project Site to contain buried archaeological resources was assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources), land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

c) Project Design Features

No Project Design Features are applicable to the Project regarding cultural resources.

d) Analysis of Project Impacts

Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

(1) Impact Analysis

(a) Direct Impacts - On-Site

As discussed in Chapter II, *Project Description*, of this Draft EIR, the Project would demolish the cold storage facility uses and existing surface parking on the South and West Sites. The Project intends to adaptively reuse a portion of the six-story LACS Building located on the North Site (i.e., the West Volume), but would demolish the remaining portion of the LACS Building (i.e., East Volume) and the attached single-story warehouse building (i.e., North Wing) on the North Site. The North Wing is not part of the LACS Building. As discussed below, the Project would retain the West Volume of the LACS Building if it is confirmed through additional testing conducted by a qualified structural engineer once the building is no longer in use as a cold storage facility that it would be structurally sound, and the historical features would remain intact following the thawing process. Following the decommissioning of the LACS Building as a cold storage facility, it would be thawed and the required structural studies, as specified in the mitigation measures in Section 13 of this report, would be conducted. However, for

purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Whether a portion of the LACS Building on the North Site is adaptively reused or not, the development programming on the North Site (and Project) would remain similar under either development scenario.

As discussed above, SurveyLA identified the LACS Building as eligible for listing in the National Register, California Register, and as a City HCM. SurveyLA did not identify any of the other buildings on the Project Site (i.e., North Wing, Main Office, Astro Warehouse, and Central Warehouse) as potentially significant. As such, demolition of these buildings would not result in direct impacts to historical resources. The analysis below focuses on the Project's impacts to the LACS Building.

The LACS Building was evaluated as eligible under the Industrial Development, 1850-1980 context; Agricultural Roots, 1850-1945 theme; From Farm to Market, 1900-1960 sub-theme; and Cold Storage Warehouse property sub-type. The LACS Building was identified as an "excellent example of an early 20th century cold storage warehouse in Downtown Los Angeles" that "played an important role in the distribution of agricultural goods and locally-sourced food products." Thus, the LACS Building was found eligible for designation at the federal, state, and local levels under Criteria A/1/1, and assigned the Status Codes 3S, 3CS, and 5S3.

The LACS Building was also evaluated as eligible for its architectural merit, as an "excellent example of a vernacular industrial building designed by master architects Eisen and Wyman." Thus, the LACS Building was found eligible for designation at the federal, state, and local levels under Criteria C/3/3, and assigned the Status Codes 3S, 3CS, and 5S3.

With regard to the East Volume, due to the inherent characteristics of early 20th century brick masonry construction, the thawing of the East Volume's masonry walls, after being constantly frozen for more than a century, is expected to cause severe and irreparable damage to the bricks and mortar, and additional damage to the structural wood beams and columns in the East Volume is likely, as they are already significantly deteriorated due to age and interior conditions of the LACS Building. As such, it is unlikely that the East Volume would be reparable without significant or wholesale reconstruction, thus resulting in a near total loss of historic fabric. In order for the Applicant to develop the programmatic requirements for the Project and prepare for the redevelopment of the Project Site, it is necessary to make certain assumptions. Retention, rehabilitation, and adaptive reuse of the East Volume is not practical from a structural, economic, or historic preservation standpoint. Therefore, the potential retention of the East Volume is not contemplated as part of the recommended mitigation for the Project. The demolition of the East Volume represents a loss of approximately 50 percent of the historic square footage and the corresponding historic fabric of the LACS Building, and impacts would be potentially significant.

As discussed further in the Historic Report, based on the characteristics of its construction and examples from similar adaptive reuse projects elsewhere, it is anticipated that the West Volume, constructed of reinforced concrete, may withstand the thawing process better than the unreinforced brick masonry and wood framing in the East Volume. The West Volume is structurally independent from the East Volume; therefore, it is feasible to contemplate retention of the West Volume independent of the East Volume. However, because the currently operating West Volume has been “frozen” for over 100 years, a confirmation of the structural integrity of the West Volume cannot be made until the existing operations cease (when and if the Project is approved) and the LACS Building is “unfrozen.” Accordingly, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building, including the West Volume.

The 1959-1967 alterations and the North Wing, constructed in 1985, were completed outside of the period of significance for the cold storage property type and do not reflect an early 20th century industrial development pattern, and they are not significant architecturally. As such, they do not contribute to the significance of the LACS Building. Therefore, demolition of the 1985 North Wing and demolition of the additions to the LACS Building constructed between 1959-1967 would not result in the loss of historically significant resources on the Project Site. However, the demolition of the East and/or West Volumes of the LACS Building, which collectively comprise a historical resource as defined by CEQA, in whole or in part, would result in a significant adverse impact that cannot be mitigated to a less-than-significant level. Thus, for purposes of this EIR analysis, impacts to the LACS Building are considered to be significant and unavoidable.

CEQA requires the consideration of feasible mitigation measures in order to lessen or avoid the significant adverse impacts of a Project on the environment. The CEQA Guidelines define mitigation as those measures which could avoid the impact altogether or minimize the impact by limiting its degree or magnitude.³⁹ Therefore, because it is unknown at this time whether the West Volume would survive the thawing process intact and remain structurally sound, the Historical Report recommends mitigation measures, as shown below, to investigate the potential for retaining and rehabilitating the West Volume of the LACS Building and adaptively reusing it as part of the Project. For conservative analysis of Project impacts for purposes of CEQA, it is acknowledged that the potential retention of the West Volume would minimize the impacts to historical resources resulting from the Project. However, even if it is determined that the West Volume can be retained and rehabilitated as specified in the recommended mitigation measures, impacts to historical resources would be lessened but would not be reduced to a less-than-significant level. Therefore, whether the LACS Building is demolished in whole or in part, the Project would result in a significant and unavoidable adverse impact to historical resources on the Project Site that cannot be mitigated to a less-than-significant level.

³⁹ CEQA Guidelines, Section 15370.

Based on the above, with demolition in whole or in part of the East Volume and/or West Volume, which comprise the LACS Building, a historical resource, the Project would result in a substantial adverse change in the significance of a historical resource, as defined in CEQA Guidelines Section 15064.5. While the Project intends to adaptively reuse the West Volume, its reuse is uncertain prior to implementation of the recommended mitigation measures. Regardless, whether the LACS Building is demolished in whole or in part, the Project would result in a significant and unavoidable adverse impact to historical resources on the Project Site that cannot be mitigated to a less-than-significant level.

(b) Direct Impacts - Off-Site

(i) Historic Properties

As discussed in the Historic Report and summarized above, there are four (4) properties that were identified as potentially individually eligible by SurveyLA in the Project vicinity: 333 Central Avenue (Produce Exchange Building); 529 Central Avenue (Fisherman's Outlet); 500 S. Alameda Street (Valero Gas Station); and 542 Alameda Street (Southern California Gas Co., Stationery & Printing Dept).

With regard to the four off-site historic resources in the Project vicinity, the Historical Report determined that potential direct impacts to the off-site resources from Project construction or operation activities would all be less than significant. Each of the off-site historic resources are physically separated from the Project Site to such an extent that there are no reasonably foreseeable potential impacts as a result of construction activity on the Project Site, including structural vibration impacts. Further, the Project does not propose to demolish, alter, relocate, or convert any of the off-site resources. The Project would not materially alter any of the off-site resources, and they would retain the essential physical characteristics that convey their historic significance. Therefore, there would be no direct impacts to the off-site historical resources as a result of Project operation.

(ii) Historic Districts

SurveyLA also identified two potential historic districts that are located wholly or partially in the Study Area identified by the Historical Report: the Fifth Street SRO Hotel Historic District, and the Downtown Los Angeles Industrial Historic District.

The Project is located outside the boundary of the potential Downtown Los Angeles Historic District. The Project does not propose to demolish, alter, relocate, or convert any potential contributors or other physical features that characterize the potential district. The Project would construct ten buildings that range from six to 44 stories in height and excavate for subterranean parking. However, the closest potential contributors to the Project Site are located across Alameda Street to the east. They are therefore physically separated from the Project Site to such an extent that there are no reasonably foreseeable potential impacts as a result of construction activity on the Project Site. The Project would not materially alter any potential contributors to the potential historic district, and the

potential district overall would retain the essential physical characteristics that convey its historic significance. Therefore, there would be no direct impacts to the potential Downtown Los Angeles Historic District as a result of the Project.

The Project is also located outside the boundary of the potential Fifth Street SRO Hotel Historic District. The Project does not propose to demolish, alter, relocate, or convert any potential contributors located within the potential district. On the South and West Sites, the Project would construct eight buildings that range from six to 28 stories in height and would excavate for subterranean parking on the South Site. The potential Fifth Street SRO Hotel Historic District is located southwest and west of the Project Site, along the north side of 5th Street west of Gladys Avenue. The potential district is separated from the South Site by Central Avenue and several intervening parcels; the closest potential contributors are separated from the West Site by two intervening parcels. Potential contributors to the potential historic district are therefore physically separated from the Project Site to such an extent that there are no reasonably foreseeable potential impacts as a result of construction activity on the Project Site. The Project would not materially alter any potential contributors to the potential historic district, and the potential district overall would retain the essential physical characteristics that convey its historic significance. Therefore, there would be no direct impacts to the potential Fifth Street SRO Hotel Historic District as a result of the Project.

Based on the above, there would be no direct impacts to the potential Downtown Los Angeles Industrial Historic District or the potential Fifth Street SRO Hotel Historic District as a result of the Project.

(c) Indirect Impacts – On-Site

The Project proposes to redevelop the Project Site with a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the North, South, and West Sites that comprise the Project Site. On the North Site, the Project would result in the whole or partial demolition of the LACS Building, which would represent a significant adverse impact to a historical resource that cannot be mitigated to a less-than-significant level. The Project would construct a new 44-story residential tower and six-level parking structure on the North Site. If the LACS Building (East and West Volumes) is demolished in whole, there would be no remaining historical resources on the Project Site, and therefore there would be no potential for indirect impacts to historical resources on the North Site resulting from the Project.

If the West Volume of the LACS Building is retained, the proposed residential tower would be located immediately north of the West Volume, separated by a paseo approximately 15 feet wide. The new residential tower would not be attached to the retained West Volume, and there would be separation between the old and new construction on the primary, street-fronting façades of the West Volume and the residential tower. Following construction of the residential tower, the West Volume would continue to read as a distinct building, it would remain visible in its historic location and would maintain its relationship

to Central Avenue, and the physical features of its original Industrial Vernacular and Neoclassical design would not be altered or obscured.

The proposed new parking structure on the North Site would be constructed to the rear of the West Volume and would abut the West Volume on its east façade, which is currently an interior wall. The parking structure would be subordinate to the West Volume of the LACS Building in size and scale and would be compatible in massing. The primary, street-fronting south, west, and north façades of the West Volume would remain intact and visible, and the physical features of those façades that convey the aesthetic and historic sense of an early 20th century reinforced concrete industrial building would not be altered or obscured by the parking structure.

However, the Project would add significant height and density to the Project Site and would introduce 10 contemporary buildings in varying heights and sizes to an area that historically was developed with low density industrial buildings. In particular, the contemporary design of the residential tower is not compatible with the early 20th century industrial uses or physical characteristics that characterize the Project Site in general, and the LACS Building specifically. Therefore, the immediate environs of the West Volume of the LACS Building, if it is retained, would be significantly altered. The new construction proposed for the South and West Sites, along with the residential tower on the North Site, would add significant new construction to the area overall, substantially changing the industrial character of the surrounding area and resulting in a loss of integrity of setting. Loss of integrity of setting on its own would typically not materially impair an early industrial building such that it could no longer convey its historic significance. **However, in order to present a conservative analysis of potential impacts to historical resources on the Project Site, the introduction of a contemporary 44-story building in immediate proximity to the six-story Industrial Vernacular West Volume of the LACS Building, when taken into consideration along with the loss of the East Volume, would result in a significant adverse change to the setting of the West Volume. Thus, indirect historical impacts to the West Volume would be potentially significant.**

(d) *Indirect Impacts – Off-Site*

(i) *Produce Exchange Building*

As indicated above, the Produce Exchange Building was identified as eligible for historic designation by SurveyLA as an excellent and rare example of an early 20th century produce brokerage building in Downtown Los Angeles. The Produce Exchange Building is located on the west side of Central Avenue, approximately 230 feet from the northwest corner of the North Site. The Project would construct a 44-story residential tower and associated parking structure on the North Site, which is in proximity of the Produce Exchange Building. The Project therefore has the potential to impact the setting of the Produce Exchange Building. The proposed new construction is incompatible with the character of the surrounding area. The Project would introduce a new, contemporary building of significant height in an area currently occupied by low-density industrial uses,

thereby altering the immediate environs of the Produce Exchange Building. However, the impact would be less than significant. The new construction would be approximately 230 feet away from the Produce Exchange Building, on the opposite side of Central Avenue, creating a physical separation between the historical resource and the Project Site. The Produce Exchange Building is located at the corner of Central and Towne Avenues; it would remain highly visible from both streets, despite the introduction of new construction in the vicinity. The significance of the Produce Exchange Building as a rare example of an early 20th century industrial property type is expressed through its physical features, which would not be altered or obscured by the Project. The Produce Exchange Building would retain the essential features that convey its historic significance, and therefore, it would not be materially impaired as a result of new construction as proposed by the Project. As such, impacts would be less than significant.

(ii) *Fisherman's Outlet*

As indicated above, the Fisherman's Outlet was identified as eligible for local listing by SurveyLA as a long-term location of a business important to the commercial identity of Downtown Los Angeles. Fisherman's Outlet is located on the west side of Central Avenue, approximately 320 feet southwest of the southwest corner of the South Site. The Project would construct multiple buildings ranging in height from six- to 28-stories, along with subterranean parking, on the South Site, which is in proximity of the Fisherman's Outlet. The Project therefore has the potential to impact the setting of the Fisherman's Outlet. The proposed new construction is incompatible with the character of the surrounding area. The Project would introduce new, contemporary buildings of significant height in an area currently occupied by low-density industrial uses, thereby altering the immediate environs of the Fisherman's Outlet. However, the impact would be less than significant. The new construction would be approximately 320 feet away from the Fisherman's Outlet, on the opposite side of Central Avenue, creating a physical separation between the historical resource and the Project Site. The Fisherman's Outlet is located on the corner of Central and Ceres Avenues; it would remain highly visible from both streets, despite the introduction of new construction in the vicinity. The significance of the Fisherman's Outlet is as a long-term business in this area of Los Angeles; the physical features that convey that significance would not be altered or obscured by the Project. In addition, according to the eligibility standards developed by SurveyLA for properties that are significant under the commercial identity theme, retention of integrity of setting is not required for a property to convey its significance. The Fisherman's Outlet would retain the essential features that convey its historic significance, and therefore, it would not be materially impaired as a result of new construction as proposed by the Project. As such, impacts would be less than significant.

(iii) *Valero Gas Station*

As indicated above, the Valero Gas Station was identified as eligible for historic designation by SurveyLA as a rare example of a 1940s service station in Los Angeles' primary industrial district. Valero Gas Station is located on the east side of Alameda Street, to the southeast of the South Site, approximately 235 feet from the southeast

corner of the South Site. The Project would construct multiple buildings ranging in height from six- to 28-stories, along with subterranean parking, on the South Site, which is in proximity of the Valero Gas Station. The Project therefore has the potential to impact the setting of the Valero Gas Station. The proposed new construction is incompatible with the character of the surrounding area. The Project would introduce new, contemporary buildings of significant height in an area currently occupied by low-density industrial uses, thereby altering the immediate environs of the Valero Gas Station. However, the impact would be less than significant. The new construction would be approximately 235 feet away from the Valero Gas Station, on the opposite side of Alameda Street, creating a physical separation between the historical resource and the Project Site. The significance of the Valero Gas Station as a rare example of a 1940s service station in this part of Los Angeles, is expressed through its physical features, which would not be altered or obscured by the Project. In addition, according to the eligibility standards developed by SurveyLA for the service station property type, integrity of setting may have been altered, as long as the original relationship to the street and to adjacent buildings is retained, and the relationship of the building to the spatial needs of the automobile remains unaltered. The Valero Gas Station is located on the corner of Alameda Street and 5th Street; it would retain its original relationship to the street and immediately adjacent buildings; it would maintain the spatial needs of the automobile; and it would remain highly visible from both streets, despite the introduction of new construction in the vicinity. The Valero Gas Station would retain the essential features that convey its historic significance, and therefore, it would not be materially impaired as a result of new construction as proposed by the Project. As such, impacts would be less than significant.

(iv) Southern California Gas Co. Stationary & Printing Department

As indicated above, the Southern California Gas Co. Stationary & Printing Department was identified by SurveyLA as a contributor to the potential district, and as a potential individual historical resource as an excellent example of a 1930 daylight factory in Los Angeles' primary industrial district. The Southern California Gas Co. Stationary & Printing Department is located on the east side of Alameda Street, to the southeast of the South Site, approximately 500 feet from the southeast corner of the South Site. The Project would construct multiple buildings ranging in height from six- to 28-stories, along with subterranean parking, on the South Site, which is in proximity of the Southern California Gas Co. Stationary & Printing Department. The Project therefore has the potential to impact the setting of the Southern California Gas Co. Stationary & Printing Department. The proposed new construction is incompatible with the character of the surrounding area. The Project would introduce new, contemporary buildings of significant height in an area currently occupied by low-density industrial uses, thereby altering the immediate environs of the Southern California Gas Co. Stationary & Printing Department. However, the impact would be less than significant. The new construction would be approximately 500 feet away from the historical resource, on the opposite side of Alameda Street, creating a significant physical separation between the historical resource and the Project Site. The significance of the Southern California Gas Co. Stationary & Printing

Department as an excellent example of the daylight factory property type is expressed through its physical features, which would not be altered or obscured by the Project. In addition, the eligibility standards developed by SurveyLA for the daylight factory property type acknowledge that changes in setting may have occurred which would not impact the potential eligibility of buildings that are significant as an example of the type. The Southern California Gas Co. Stationery & Printing Department would retain the essential features that convey its historic significance, and therefore, it would not be materially impaired as a result of new construction as proposed by the Project. As such, impacts would be less than significant.

(v) *Downtown Los Angeles Industrial Historic District*

As discussed above, the potential Downtown Los Angeles Industrial Historic District was identified as significant for its role in the industrial development of Los Angeles in the early 20th century. It is located between the Alameda Street corridor and the Los Angeles River, just east of downtown Los Angeles. The Project Site is located outside the boundaries of the potential Downtown Los Angeles Industrial Historic District, and therefore the physical characteristics of the potential historic district, the integrity of setting within the potential historic district boundaries, and the relationship between the contributing resources would not be impacted by the Project. However, the Project would add significant height to the skyline in an area that is primarily low-density in character and would therefore alter the wider surroundings of the potential historic district and potentially compromise the integrity of setting of some district contributors.

Altering the wider setting outside the boundaries of the potential historic district would not result in a material change such that the potential district would no longer convey its historic significance. The potential Downtown Los Angeles Industrial Historic District is significant as the City's primary industrial district from the late-19th century through the beginning of World War II. The potential Downtown Industrial Historic District is characterized by inconsistency of setting, with variations in building sizes, heights, setbacks, design, and materials throughout the potential district and in the wider environs of the Central City and Central City North CPAs. The significance of the potential historic district is conveyed by the physical characteristics and interrelationship of the potential district contributors, which collectively result in a strong sense of time and place within the potential district boundary. These characteristics would not be materially altered by proposed new construction outside the potential district boundaries, regardless of the height and density, and the overall historic development pattern in this area of the City would still be apparent.

Because of the height of some of the proposed new buildings, the Project would be visible from some locations within the potential historic district. However, the visibility of new high-rise construction outside the boundaries of the potential district would not alter the potential district's ability to convey its significance. The visibility of nearby new construction and the alteration of the setting outside the potential district's boundaries would not affect the understanding of its historic significance. Therefore, the Project would not alter the potential Downtown Los Angeles Industrial Historic District in an adverse

manner such that its physical characteristics would no longer convey its historic significance. As such, impacts would be less than significant.

(vi) *Fifth Street SRO Hotel Historic District*

As discussed above, the potential Fifth Street SRO Hotel Historic District was identified as significant as a concentration of early 20th century SRO hotels in Downtown Los Angeles. It is composed of seven contributing properties on the north side of 5th Street between Gladys Avenue on the east and Crocker Street on the west. The Project Site is located outside the boundaries of the potential Fifth Street SRO Hotel Historic District, and therefore the physical characteristics of the potential historic district, the integrity of setting within the potential historic district boundaries, and the relationship between the contributing resources would not be impacted by the Project. However, the Project would add significant height to the skyline in an area that is primarily low-density in character and would therefore alter the wider surroundings of the potential historic district and potentially compromise the integrity of setting of the potential historic district.

Altering the wider setting outside the boundaries of the potential historic district would not result in a material change such that the potential district would no longer convey its historic significance. The potential Fifth Street SRO Hotel Historic District is significant as a concentration of early 20th century SRO hotels. The potential historic district is oriented in a linear configuration along the north side of 5th Street. The potential contributors represent a cohesive urban block face set at the sidewalk facing 5th Street. The potential district is therefore primarily experienced along 5th Street, and most of the character-defining architectural features of the potential contributing buildings are on the primary façades. New construction proposed by the Project would therefore be primarily visible from the rear of the potential contributing buildings within the potential district. The significance of the potential historic district is conveyed by the physical characteristics and interrelationship of the potential district contributors. These characteristics would not be materially altered by proposed new construction outside the potential district boundaries, regardless of the height and density, and the overall historic development pattern in this area of the City would still be apparent. Therefore, the Project would not alter the potential Fifth Street SRO Hotel Historic District in an adverse manner such that its physical characteristics would no longer convey its historic significance. As such, impacts would be less than significant.

(vii) *Conclusion*

Based on the above, indirect impacts to historical resources in the vicinity of the Project Site would be less than significant, as the Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

(2) Mitigation Measures

As discussed above, a goal of the Project is to retain the West Volume of the LACS Building if it is determined that it would remain structurally sound and largely intact

following the thawing process. Therefore, the following mitigation measures are recommended for the Project:

CUL-MM-1: Documentation. In order to document the LACS Building and its contribution to the early industrial history of Los Angeles, prior to the issuance of demolition permits, or any abatement or demolition work on the North Site, the LACS Building shall be documented according to Historic American Building Survey (HABS) Level III standards, appropriate for a building that has not been formally designated but which has been identified as significant in a historic resources survey. The Project would result in a cumulative impact to the cold storage property type; therefore, the documentation shall provide information to future researchers on an increasingly rare property type that played a crucial role in the industrial development of the City in the early 20th century. The HABS Level III documentation shall be prepared by a historian or architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Standards in the relevant discipline. The documentation shall be reviewed and approved by the Department of City Planning, Office of Historic Resources. Digital copies of the documentation shall be offered to the following repositories: the Los Angeles Public Library; Department of City Planning, Office of Historic Resources; and the Los Angeles Conservancy.

CUL-MM-2: Interpretation. The Applicant shall develop an interpretive program describing the history of the LACS Building and Los Angeles Cold Storage. The interpretive program shall be made accessible to the public and may include historic photographs or other ephemeral materials documenting the history of the Los Angeles Cold Storage, the development of the Industrial core of Los Angeles, the history of the Project Site as an early ice production and cold storage facility, and other relevant themes as determined. The format and location of the interpretive program shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

CUL-MM-3: Thawing Plan. Once the LACS Building is no longer in operation as a cold storage facility, a thawing process shall be undertaken prior to conducting any testing to determine the condition of the structural elements and other historic features. In order to minimize potential damage to the LACS Building resulting from thawing a building that has been used for cold storage for over 100 years, the Applicant shall retain a qualified structural engineer who meets the Secretary of the Interior's Historic Preservation Professional Standards in Engineering to prepare a "Thawing Plan." The Thawing Plan shall be prepared prior to the issuance of any demolition permits for the North Site, and shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

CUL-MM-4: Structural Analysis. Once the thawing process of the LACS Building is complete, and prior to the issuance of any demolition permits for the North Site, the Applicant shall retain a qualified structural engineer to conduct the appropriate "Structural Analysis" to determine whether the West Volume of the LACS Building can be retained, rehabilitated, and adaptively reused as part of the Project. The

structural engineer shall meet the Secretary of the Interior’s Historic Preservation Professional Standards in Engineering and shall have specific expertise in the evaluation of historical resources. The methodology for the Structural Analysis shall be reviewed and approved by the Department of City Planning, Office of Historic Resources, and is to include the following tests:

- Compressive Strength of Concrete Test. The compressive strength of the structural concrete must be a minimum of 2,000 pounds per square inch (psi). A lower number might indicate damaged concrete due to freeze and thaw and increases the unreliability of the quality of concrete to support future loads for the new lifespan of the Project.
- Yield/Tensile Strength of Reinforcing Steel Test. The yield/tensile strength of the rebar must be a minimum 20,000 psi. A lower number might indicate excessive rusting of the reinforcing steel and increases the unreliability of the reinforcing steel to support future loads for the new lifespan of the Project.
- Foundation/Soil Sampling. The soil bearing capacity must be a minimum of 1,500 pounds per square foot (psf). A lower number might indicate erosion of the soil due to freeze and thaw and would be unsuitable to support future loads for the new lifespan of the Project due to excessive settlement.

The results of the Structural Analysis shall be submitted for review and approval by the Department of City Planning, Office of Historic Resources and the Los Angeles Department of Building and Safety. A qualified structural engineer shall make a determination on the potential for the West Volume of the LACS Building to be retained and rehabilitated based on the results of the Structural Analysis testing. If, as determined by a qualified structural engineer, the Structural Analysis demonstrates that the strength of concrete, strength of reinforcing steel, or the foundation/soil sampling tests do not meet the required thresholds as outlined above and therefore the West Volume of the LACS Building would be unreliable to support future loads for the lifespan of the Project; or, if it is determined that the West Volume of the LACS Building meets the definition of a “Hazardous Building” as specified in LAMC Division 89, Section 91.8902, the Applicant may apply for and receive a demolition permit for the West Volume of the LACS Building.

If the Structural Analysis, as approved by the Department of City Planning, Office of Historic Resources and the Los Angeles Department of Building and Safety, demonstrates that the West Volume of the LACS Building is structurally sound for human occupancy, it shall be retained, rehabilitated, and adaptively reused as part of the Project.

The following recommended mitigation measures would apply only if the West Volume of the LACS Building is to be retained:

CUL-MM-5: Historic Architect. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, the Applicant shall retain a historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture. The historic architect shall prepare

the Historic Structure Report and Mothballing Plan as specified; shall review the proposed plans for the rehabilitation and adaptive reuse of the West Volume of the LACS Building to ensure the appropriate treatment of the significant character-defining features of the West Volume of the LACS Building; and shall be responsible for overseeing the implementation of the proposed plans for the rehabilitation and adaptive reuse related to historical resources on behalf of the Applicant.

CUL-MM-6: Historic Structure Report. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, in order to provide adequate documentation to guide the rehabilitation of the West Volume of the LACS Building, a Historic Structure Report (“HSR”) shall be prepared for the West Volume of the LACS Building. The HSR shall be prepared in conformance with the National Park Service’s *Preservation Brief 43: The Preparation and Use of Historic Structures Reports*.⁴⁰ The HSR shall provide complete documentary, graphic, and physical information about both the history and existing condition of the West Volume of the LACS Building. In addition, the report shall include appropriate methods for treatment of the West Volume, which would be retained and rehabilitated as part of the Project, outline a recommended scope of work, and provide information and recommendations for further treatment. The HSR shall be prepared by a qualified historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture. The HSR shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

CUL-MM-7: Mothballing Plan. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, because the Project is proposed to be undertaken in phases, in order to protect the West Volume of the LACS Building until it is rehabilitated as part of the Project, a Mothballing Plan shall be prepared and implemented for the West Volume of the LACS Building. The Mothballing Plan shall be prepared in conformance with the National Park Service’s *Preservation Brief 31: Mothballing Historic Buildings*.⁴¹ The Mothballing Plan shall outline the steps required to temporarily protect the West Volume of the LACS Building from damage or deterioration and shall be updated after five years. The Mothballing Plan shall be prepared by a qualified historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture. The Mothballing Plan shall be reviewed and approved by the Department of City Planning, Office of Historic Resources.

CUL-MM-8: Protection Plan. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, prior to issuance of a grading permit, a structural engineer who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Engineering shall prepare a “Protection

⁴⁰ U.S. Department of the Interior, National Park Service. “Preservation Brief 43: The Preparation and Use of Historic Structures Reports,” 2005.

⁴¹ U.S. Department of the Interior, National Park Service, “Preservation Brief 31: Mothballing Historic Buildings,” 1993.

Plan” to ensure that the West Volume of the LACS Building is properly protected from potential damage resulting from demolition, excavation, and construction procedures on the Project Site, including an appropriate shoring plan to mitigate the possibility of settlement due to the removal of adjacent soil. The Protection Plan shall be reviewed by a historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture, and approved by the Department of City Planning, Office of Historic Resources.

(3) Level of Significance After Mitigation

As discussed above, for purposes of this Draft EIR to provide a conservative analysis of impacts, the Project is assumed to demolish the LACS Building (both the East and West Volumes), which is a historical resource as defined by CEQA. The demolition of a historical resource constitutes a significant adverse impact that cannot be mitigated to a less-than-significant level. However, CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of a significant effect on the environment. Accordingly, Mitigation Measures CUL-MM-1 to CUI-MM-8 would be implemented by the Project.

If it is confirmed that the West Volume of the LACS Building would remain substantially intact and structurally sound following the thawing process, and therefore would be retained, rehabilitated, and adaptively reused as part of the Project, the West Volume would represent a remnant of a significant industrial building in the original industrial core of Los Angeles. The demolition of the East Volume would remove nearly 50% of the historic fabric of the LACS Building, representing almost the entire original portion of the building as constructed in 1903, which established the cold storage use at the Project Site. There would therefore be a significant loss of integrity of design, materials, and workmanship to the LACS Building with the demolition of the East Volume. The LACS Building, not its component parts, is the historical resource as defined by CEQA; therefore, for purposes of this analysis, the West Volume is not considered a historical resource on its own and the loss of the East Volume is considered a significant adverse impact to a historical resource. However, there is historical value in the potential retention of the West Volume of the LACS Building. If retained, the West Volume would represent one of the earliest surviving examples of reinforced concrete construction in the City, would remain in its original location, would retain its historic relationship along Central Avenue, and would reflect the early industrial development of Los Angeles. Therefore, although the retention of the West Volume would not mitigate Project impacts to a less-than-significant level, it would preserve a physical remnant of Los Angeles’ industrial history from the first decade of the 20th century.

If the West Volume can be retained, it would be protected in place during construction, including the development of a shoring plan to prevent damage resulting from demolition, excavation, and construction procedures on the Project Site on the Project Site as specified in the recommended mitigation for the Project. If the West Volume is retained, the exterior would be rehabilitated, and significant exterior character-defining Industrial Vernacular and Neoclassical features of its north, west, and south façades would be

retained, including its reinforced concrete construction, rectangular plan with rounded corners, simple massing, symmetrical composition, flat roof with parapet and blind balustrade, flush and recessed bays framed by piers, stringcourses, frieze, cornice, decorative corbels, and oculus windows.

The West Volume would be adaptively reused for new commercial and residential uses proposed by the Project. As part of the adaptive reuse of the West Volume, it would be seismically upgraded as required by the City. In order to accommodate the new uses, the Project would open the blocked ground-floor truck doors and blank walls on the west and south façades for new glazed storefronts. The blind windows on the upper floors would be opened and new windows installed; and new window openings would be added in the blank bays between piers. The Project would partially alter the appearance of the West Volume by adding openings where none exist currently. The added storefronts and window openings would be required to accommodate the proposed new uses; however, they would fit within the existing bays and maintain the historic rhythm and articulation of the south, west, and north façades. Therefore, if the West Volume of the LACS Building is retained and rehabilitated as part of the Project, it would retain important physical features of its original 1907 construction and would continue to convey its association with the early industrial history of Los Angeles.

The LACS Building, composed collectively of the East and West Volumes, represents a historical resource as defined by CEQA. Therefore, despite the potential benefits of retaining the West Volume if it is determined that it would remain substantially intact and structurally sound following the thawing process, the demolition of the East Volume represents a loss of approximately 50% of the historic square footage and the corresponding historic fabric of the LACS Building. The West Volume would therefore represent a remnant of a historical resource; for purposes of this analysis, it would not be considered a historical resource as defined by CEQA because it is only a portion of the LACS Building as it exists prior to implementation of the Project. As a result, even if it is determined that the West Volume can be retained and rehabilitated as specified in the recommended mitigation measures, impacts to historical resources would be lessened but would not be reduced to a less-than-significant level. Therefore, whether the LACS Building is demolished in whole or in part, the Project would result in a significant and unavoidable adverse impact to a historical resource on the Project Site that cannot be mitigated to a less-than-significant level.

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

(1) Impact Analysis

As a result of the archival research and archaeological resources survey conducted for the Project, no prehistoric or historic archaeological resources have been previously recorded within the Project Site; however, one historic period archaeological resource was previously recorded within a quarter-mile radius. This resource, P-19-004460

consists of 63 historic period refuse deposits (dating from 1880 to 1923) and five structure features (foundation walls, one brick cistern, one concrete foundation, one ceramic pipe, and railroad track segments) that were uncovered during archaeological construction monitoring of the Los Angeles Department of Water and Power La Kretz Innovation Project in the Arts District located 900 feet southeast from the Project Site. In addition, the records search through NAHC's SLF yielded positive results, although specific details of the nature and location of the resource(s) were not provided. Refer to Section IV.K, *Tribal Cultural Resources*, of this Draft EIR, for further discussion regarding tribal cultural resources. Furthermore, as shown on early maps of the region, a branch of the *zanja* conduit system (Zanja No. 3) once followed a north-south trend through the West Site.

While the Project Site has been disturbed, construction techniques prior to the mid-20th century generally required very little site preparation and often just paved over or built on top of the remnants of previous uses. Therefore, there is potential for ground disturbing activities to encounter archaeological materials associated with the former historic uses of the Project Site. This has also been supported by the discovery of a historic archaeological resource (P-19-004460) during construction of a nearby project in the Arts District that had a similar development and land use history as the Project Site and the results of the geoarchaeological review which suggests that fill soils within the Project Site (which extend from the surface down to eight feet bgs) have the potential to contain these types of resources. The Project Site is also considered to have higher sensitivity for prehistoric archaeological resource within fine-grained Holocene-aged alluvium that underlies the fill soils, due to the proximity to fresh water and riparian resources offered by channel levees that could have attracted prehistoric inhabitants for subsistence, if not necessarily sustained occupation. As a result of these findings, Project excavations, which are anticipated to reach depths of 22 to 64 feet bgs, have a high potential for encountering buried historic and prehistoric archaeological resources.

Therefore, the Project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 and impacts would be potentially significant.

(2) Mitigation Measures

The following mitigation measures are required to address the potential impacts on archaeological resources during Project construction due to inadvertent discovery:

CUL-MM-9: Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for professional archaeology (qualified Archaeologist) to carry out and ensure proper implementation of mitigation measures that address archaeological resources. The Applicant shall submit a letter of retention to the City of Los Angeles Department of City Planning (City) before construction activities commence to demonstrate to the City that the Applicant has retained a qualified Archaeologist who meets the Secretary of the Interior's Professional

Qualifications Standards. The letter shall include a resume for the qualified Archaeologist.

The qualified Archaeologist shall oversee an archaeological monitor who has a bachelor's degree in a relevant field of study and either two months of archaeological construction monitoring experience or two months of supervised training with prehistoric or historic archaeological materials in a field or laboratory setting. The archaeological monitor shall be present during construction activities on the Project Site deemed by the qualified Archeologist to have the potential for encountering archeological resources, such as demolition, pavement removal, clearing/grubbing, drilling/auguring, potholing, grading, trenching, excavation, tree removal, or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. The archeological monitor shall have the authority to reasonably direct the pace of construction equipment activity in areas reasonably expected to be of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist.

CUL-MM-10: Prior to commencement of construction activities, a Sensitivity Training shall be given by the qualified Archaeologist for construction personnel. The training shall focus on how to identify archaeological resources that may be encountered during construction activities, and the procedures to be followed in such an event. Within five days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the Applicant. The Applicant shall maintain the documentation of this training, including the list of attendees, for inspection by the City upon its reasonable request.

CUL-MM-11: In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue until the evaluation is completed. Work shall be allowed to continue outside of the buffer area.

All resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified Archaeologist shall coordinate with the

Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

CUL-MM-12: Within 14 days of concluding the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the Applicant and City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

(3) Level of Significance After Mitigation

Impacts related to archaeological resources during Project construction would be reduced to less than significant with implementation of Mitigation Measures CUL-MM-9 through CUL-MM-12. Monitoring of the Project Site during ground disturbing activities by a professional archaeologist will result in the identification and assessment of significant or unique archaeological resources, as well as the implementation of appropriate measures in accordance with CEQA for avoidance of the resource. If the resource(s) cannot be avoided, measures for data recovery, assessment and analysis, curation, and commemoration will be implemented.

Threshold (c): Would the Project disturb any human remains including those interred outside of formal cemeteries?

As discussed in the Initial Study (Appendix A of this Draft EIR), a number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, PRC Section 5097.98, and CEQA Guidelines Section 15064.5(e). Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant. Thus, the Project would have a less than significant impact with respect to Threshold (c) and no further analysis is required.

e) Cumulative Impacts

(1) Impact Analysis

(a) *Historical Resources*

Cumulative impacts refer to two or more individual effects that are considerable when taken together, or that compound or increase other environmental impacts.⁴² Development of related projects can affect historical resources if such projects adversely alter and/or demolish historical resources that may be interrelated, such as historical resources that are part of a historic district or historical resources that are significant within the same historic context, and the Project's contribution to the impact would be cumulatively considerable.

As discussed above, the Project would not result in direct impacts to the two potential historic districts in the Study Area. In terms of indirect impacts, while the Project would alter the larger setting of the area due to its size and scale, it would not cause a substantial material change to either potential historic district in the Study Area such that their historical significance would be materially impaired.

The Project would demolish, in whole or in part, the LACS Building, which was identified by SurveyLA as historically significant as an "excellent example of an early 20th century cold storage warehouse in Downtown Los Angeles" that "played an important role in the distribution of agricultural goods and locally-sourced food products." Even if the West Volume is retained following implementation of the recommended Project mitigation, the loss of the East Volume would still constitute a significant adverse change to the historical resource. Therefore, there would be a significant adverse impact to the LACS Building which could be cumulatively considerable in the context of the early 20th century cold storage property type.

Therefore, this analysis considers potential cumulative impacts to the following interrelated historical resources: potential cumulative impacts resulting from changes in setting to the potential Fifth Street SRO Hotel Historic District; potential cumulative

⁴² CEQA Guidelines, Section 15355.

impacts resulting from changes in setting to the potential Downtown Los Angeles Industrial Historic District; and potential cumulative impacts to the cold storage property type in Los Angeles resulting from the demolition of the LACS Building.

(i) *Potential Fifth Street SRO Hotel Historic District*

Related projects that have the potential to result in combined or cumulative impacts in association with the impacts of the Project are identified in Chapter III, *Environmental Setting*, which includes Table III-1, *Related Projects List*, and Figure III-1, *Related Projects Map*, which shows the locations of each of the related projects listed in Table III-1. There is one Related Project for which there is publicly available environmental documents that identify potential impacts to historical resources located within the boundary of the potential Fifth Street SRO Hotel Historic District: the 713 E. 5th Street Project (Related Project #18).

The 713 E. 5th Street Project is located within the boundary of the potential Fifth Street SRO Hotel Historic District. The project would demolish the Edwards Hotel at 713-717 ½ E. 5th Street, a contributor to the potential Fifth Street SRO Hotel Historic District and construct a new seven- to eight-story building within the potential district boundary. Analysis of potential impacts conducted as part of environmental review of the project found that because the potential Fifth Street SRO Hotel Historic District is geographically small in size and low in number of contributing buildings, the loss of one contributor would cause a substantial adverse change in the significance of the historical resource such that the potential historic district would no longer be eligible for historic designation. The integrity of the potential historic district would be diminished to the degree that it would no longer constitute a unified entity.⁴³

The Project would demolish the LACS Building, which would result in a substantial adverse impact to a historical resource. The 713 E. 5th Street Related Project would demolish a contributing building within the boundary of the potential Fifth Street SRO Hotel Historic District, which would result in a significant adverse impact to the potential historic district, which is a historical resource. However, the LACS Building is not located within the potential Fifth Street SRO Hotel Historic District, and the Project would not result in the alteration or demolition of any potential contributing buildings within the potential historic district boundary. The LACS Building and the potential Fifth Street SRO Hotel Historic District do not constitute interrelated historical resources, as they are not part of the same historic district, they are not significant within the same historic context, they do not represent the same property type or development pattern, and neither historical resource derives its significance based on a relationship with the other. Therefore, the demolition of the LACS Building is not cumulatively considerable with the demolition of a potential contributor to the potential Fifth Street SRO Hotel Historic District.

The new construction proposed by the Project would result in a change to the wider setting of the potential Fifth Street SRO Hotel Historic District by introducing new buildings

⁴³ GPA Consulting, "713 E. 5th Street Historical Resource Technical Report," July 2018, 26-28.

of contemporary design, and significant height and density in the area. However, the Project is located outside the potential district boundary and the significance of the potential historic district is conveyed by the physical characteristics and interrelationship among the potential contributors within the district. The area surrounding the Project Site developed over time, and as such represents multiple periods of development, contains a variety of building types, and does not have a unified character. The wider setting is not a character-defining feature of the potential historic district, and changes to the setting outside of the potential district boundary would not impair the ability of the potential Fifth Street SRO Hotel Historic District to convey its historic significance. Therefore, the cumulative impact to the potential Fifth Street SRO Hotel Historic District from the change to the wider setting resulting from the Project and the loss of a potential contributor resulting from the Related Project would be less than significant.

(ii) *Potential Downtown Los Angeles Industrial Historic District*

There are six related projects for which there is publicly available environmental documents that identify potential impacts to historical resources located within or adjacent to the potential Downtown Los Angeles Industrial Historic District: 2nd and Vignes Project (Related Project No. 10); 963 E. 4th Street Mixed-Use (Coca-Cola) Project (Related Project No. 3); 4th and Hewitt Project (Related Project No. 20); Arts District Center Project (Related Project No. 5); 1100 E. 5th Street Mixed-Use Project (Related Project No. 22); Palmetto Project (Related Project No. 17); and At Mateo Project (Related Project No. 4).

The 2nd and Vignes Project at 929 E. 2nd Street is located within the boundary of the potential Downtown Los Angeles Industrial Historic District. This project would develop a new mixed-use commercial building, which would include the rehabilitation and adaptive reuse of the two-story Challenge Cream & Butter Association (CCBA) Building and the addition of five stories to the existing building. The project site is located within the potential historic district boundaries, and the subject property was previously evaluated as a potential district contributor. The project's Initial Study concluded that this project would have a less than significant impact on historical resources. The Initial Study found that after completion of the project, the subject property would continue to convey its significance as a potential contributor to the potential historic district, and that the potential district would remain eligible for historic listing or designation. Therefore, this project would not contribute to cumulative impacts to the potential Downtown Los Angeles Industrial Historic District.⁴⁴

The 963 E. 4th Street Mixed-Use (Coca-Cola) Project at 963 E. 4th Street is located within the boundary of the potential Downtown Los Angeles Industrial Historic District. This project would renovate an existing warehouse for use as a mixed-use commercial building. The project's Mitigated Negative Declaration concluded that this project would not result in impacts to historical resources. Because the 963 E. 4th Street Mixed-Use

⁴⁴ ESA PCR, Initial Study for the 2nd and Vignes Project, February 2017.

(Coca-Cola) Project would not have impacts to historical resources it would not contribute to cumulatively considerable impacts to the potential Downtown Los Angeles Industrial Historic District.⁴⁵

The 4th and Hewitt Project at 405 S. Hewitt Street is located within the boundary of the potential Downtown Los Angeles Industrial Historic District. The project would involve the redevelopment of the site and construction of an 18-story commercial office building. The Project would demolish three buildings. Because all of these buildings are non-contributors to the potential Downtown Los Angeles Industrial Historic District, their demolition would not diminish the number of contributing buildings to the potential historic district. While the Project would alter the potential historic district's setting by adding a new 18-story building that is substantially taller than the existing buildings in the potential historic district, this alteration would not materially impair the potential historic district such that it could no longer convey its historic significance. After construction of the 4th and Hewitt project, the potential historic district would retain all of the significant character-defining features that convey its historic significance. Therefore, the combined impact of the 4th and Hewitt project and Related Projects to the potential Downtown Los Angeles Industrial Historic District would not be cumulatively considerable.⁴⁶

The Arts District Center Project at 1101 E. 5th Street is located within the boundary of the potential Downtown Los Angeles Industrial Historic District. The project would demolish ten buildings and construct a new 12-story mixed-used building. Of the ten buildings located on the project site, only one, the warehouse located at 1101 E. 5th Street, was identified by SurveyLA as a potential contributor to the potential historic district. However, a reevaluation of the property in 2018 determined that the property does not qualify as a contributor to the potential historic district because it lacks integrity as a result of substantial alterations.⁴⁷ Analysis of the potential impacts conducted as part of environmental review of the project found that the demolition of the building on the project site would not result in a substantial adverse change to the potential historic district, because it is neither individually eligible as a historic resource nor does it contribute to the significance of the potential historic district. The analysis further found that the project would introduce a new 12-story building that is not compatible with the potential historic district in size, scale, or design. As a result, the integrity of the potential historic district and its environment would be reduced by the project, although not to the degree that the historical resource would no longer be eligible for historic designation. Therefore, the relationships among the potential historic district's components, including its contributing buildings, would not be substantially changed, and the impact of the Arts District Center

⁴⁵ Mitigated Negative Declaration, ENV-2014-2443-MND. November 2014.

⁴⁶ Historic Resources Group, Historical Resource Technical Report for the 4th and Hewitt Project, February 2022.

⁴⁷ GPA Consulting, Historical Resource Technical Report for the Arts District Center Project, March 2018.

Project on the potential Downtown Los Angeles Industrial Historic District would be less than significant.⁴⁸

The 1100 E. 5th Street Mixed-Use Project at 1100 E. 5th Street is adjacent to the potential Downtown Los Angeles Industrial Historic District. This project would demolish three warehouse buildings and construct an eight-story mixed-use development. The project's Initial Study found that because at least one warehouse on the property is over 45 years of age, a potentially significant impact may result from its demolition, but that potential impacts to historical resources will be analyzed during environmental review.⁴⁹ However, because the subject property to be demolished is located outside of the potential historic district, this project would not contribute to cumulatively considerable impacts to the potential Downtown Los Angeles Industrial Historic District.

The Palmetto Project at 527 E. Colyton Street is partially located within the boundary of the potential Downtown Los Angeles Industrial Historic District. This project would demolish a warehouse building and construct a 12-story mixed-use development, including live/work residential units, various commercial uses, and a two-level subterranean parking garage. The subject property was previously evaluated as a district non-contributor. The project's Initial Study states that because the project site is located within the boundaries of the potential historic district, potential impacts to historical resources will be analyzed during environmental review. However, because the subject property to be demolished is a district non-contributor, this project would not contribute to cumulatively considerable impacts to the potential Downtown Los Angeles Industrial Historic District.⁵⁰

The At Mateo Project at 555 S. Mateo Street is located within the boundary of the potential Downtown Los Angeles Industrial Historic District. This project would develop four mixed-use buildings, ranging in height from one to 4.5-stories. Analysis of this project concluded that no buildings on the project site are historical resources, and as such, the project would not result in impacts to historical resources. Because the subject property does not contain any district contributors, this project would not contribute to cumulatively considerable impacts to the potential Downtown Los Angeles Industrial Historic District.⁵¹

The Project is located outside of the boundary of the potential Downtown Los Angeles Industrial Historic District. It would not result in the loss of any potential historic district contributors. Further, although it would result in an additional change in the wider setting of the potential Downtown Los Angeles Industrial Historic District, the introduction of additional height and density on the Project Site would not materially impair the potential historic district such that it could no longer convey its significance. The area surrounding

⁴⁸ GPA Consulting, Historical Resource Technical Report for the Arts District Center Project, March 2018.

⁴⁹ EcoTierra Consulting, Inc., Initial Study for the 1100 E. 5th Street Mixed-Use Project, February 2018.

⁵⁰ Impact Sciences, Inc., Initial Study for the Palmetto Project, October 2018.

⁵¹ City of Los Angeles, Initial Study/MND for the At Mateo Project, 2015.

the Project Site developed over time, and as such represents multiple periods of development, contains a variety of building types, and does not have a unified character. The Related Projects located within and immediately adjacent to the potential historic district found that the introduction of new construction would not alter the setting of the historic district such that impacts to the integrity of the potential district would be significant. Following implementation of the Project and Related Projects, the potential Downtown Los Angeles Industrial District would retain the physical characteristics of the potential historic district, the integrity of setting within the potential historic district boundaries, and the relationship between the potential contributing resources. Therefore, the cumulative impact of the proposed Project and the Related Projects on the potential Downtown Los Angeles Industrial Historic District would not be cumulatively considerable and less than significant.

(iii) *Cold Storage Property Type*

The Project's LACS Building is an example of the cold storage property type. In the early 20th century, cold storage facilities were clustered in the industrial core of cities near packing houses and railway depots, serving as a significant link between agricultural products from the nearby countryside and distribution via refrigerated railway boxcars. By their nature, cold storage warehouses were historically a relatively rare property type, as a single warehouse could service a large geographic area. As such, relatively few of these facilities were constructed in Los Angeles; at the height of cold storage and ice production, there were approximately five cold storage facilities built in the industrial core of Los Angeles. These cold storage facilities included warehouses owned and operated by the Los Angeles Cold Storage Company, National Cold Storage Company, Merchant's Ice Company, Union Ice Company, and Henrick Ice and Cold Storage Company. Outside of Los Angeles' industrial area, cold storage facilities were widespread geographically in order to serve other neighboring cities; there are known cold storage warehouses from the early 20th century in Pasadena and Vernon.

To inform an analysis of cumulative impacts on the cold storage facility property type from the Project, a list of other early cold storage facilities in the City and their current status was prepared based on research of primary and secondary sources and informed by the *SurveyLA Citywide Historic Context Statement: Industrial Development, 1850-1980*.⁵² Of the cold storage warehouses built in Los Angeles in the early 20th century, only the LACS Building is extant, retains sufficient integrity to convey its significance, and was identified as eligible for historic designation by SurveyLA. There is one other remaining cold storage facility, the Rancho Cold Storage warehouse (originally Henrick Ice and Cold Storage Company); however, it has been substantially altered and therefore was determined ineligible for listing by SurveyLA. The three other early cold storage warehouses have been demolished.

⁵² LSA, City of Los Angeles, Department of City Planning, Office of Historic Resources, *Citywide Historic Context Statement: Industrial Development, 1850-1980*, September 2011, revised February 2018.

The National Ice and Cold Storage Warehouse located at 210 N. Center Street was built in 1909. SurveyLA identified the warehouse as an excellent and rare example of an early-20th century cold storage facility. It was subsequently identified as a known historical resource in the Little Tokyo Redevelopment Plan. It was demolished in 2018-2019. No additional environmental documentation was available for this project.

The Union Ice Company Warehouse located at 1515 S. Industrial Street was built in 1905. The building was found to have undergone substantial alterations. Due to a lack of integrity, the building was found ineligible for listing in the National Register, California Register, or for designation as a City HCM.⁵³ The building was demolished in 2019.

As such, the LACS Building is the last extant early 20th century cold storage facility in the City that retains its integrity and therefore continues to convey its significance as an example of the type. Because two extant early cold storage facilities have been recently demolished; one has been significantly altered to a degree that it does not convey significance; and the LACS Building would be demolished as part of the Project, the impacts to the cold storage warehouse property type resulting from the Project would be cumulatively considerable with impacts being significant and unavoidable.

Based on the above, the Project's contribution to cumulative impacts in association with cold storage facilities would be cumulatively considerable with impacts being significant and unavoidable.

(b) Archaeological Resources

Many of the related projects, including the related projects in the Project vicinity, would be expected to require grading and excavation that have the potential to encounter archaeological resources, although in some cases, these related projects are located in developed urban areas with sites that have been previously disturbed, which would reduce the likelihood of encountering archaeological resources. As discussed above, the Project has the potential for inadvertent archaeological discovery and would be required to implement Mitigation Measures CUL-MM-9 through CUL-MM-12, which would reduce the Project's impacts on archaeological resources to a less-than-significant level. Similarly, as part of environmental review for the related projects, it is expected that mitigation measures would be imposed where necessary to reduce the potential for significant impacts on archaeological resources, as is required by the City. Compliance with regulatory requirements and implementation of required mitigation measures for each individual development project would ensure that impacts to archaeological resources remain less than significant and reduce the potential for the individual related projects to contribute to cumulative impacts. As such, Project impacts to archaeological resources are not cumulatively considerable and cumulative impacts would be less than significant with mitigation. **For these reasons, the Project, considered together with the related projects, would not cause a cumulatively significant substantial adverse**

⁵³ PCR Services Corporation, "Historical Resources Assessment Report for the Union Ice Company (Union Central Cold Storage Building), 1525 Industrial Avenue, Los Angeles," March 2015.

change in the significance of an archaeological resource pursuant to Section 15064.5.

(2) Mitigation Measures

Cumulative impacts to the potential Fifth Street SRO Hotel Historic District and the potential Downtown Los Angeles Industrial Historic District were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level regarding historic districts remains less than significant.

However, cumulative impacts to the “cold storage property type” were determined to be significant and unavoidable even with the implementation of Mitigation Measures CUL-MM-1 to CUL-MM-8. There are no additional feasible mitigation measures that would further reduce this cumulative impact.

Cumulative indirect impacts to archaeological resources were determined to be less than significant with mitigation. Therefore, no additional mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts to the potential Fifth Street SRO Hotel Historic District and the potential Downtown Los Angeles Industrial Historic District were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level regarding historic districts remains less than significant.

Cumulative impacts to the “cold storage property type” were determined to be significant and unavoidable even with the implementation of Mitigation Measures CUI-MM-1 to CUL-MM-8.

Cumulative impacts to archaeological resources were determined to be less than significant with mitigation. Therefore, no additional mitigation measures were required or included, and the impact level remains less than significant with mitigation.

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