

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources (i.e., historical resources) that could result from implementation of the Project. Historical resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. This section is based in part on *The Bloc Residential Tower & Sign SUD Project Historical Resource Technical Report* (Historical Report) prepared by Teresa Grimes Historic Preservation (February 2024) included as Appendix C of this Draft EIR.¹ The Project's potential impacts related to archaeological resources and human remains were fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR and determined to be less than significant.

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:

- National Historic Preservation Act of 1966, as amended
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- Native American Graves Protection and Repatriation Act

¹ *Historic Preservation, The Bloc Residential Tower & Sign SUD Project, Los Angeles, California, Historical Resources Technical Report, February 2024.*

- 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
- Central City Community 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, 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.”² 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.³

² 36 Code of Federal Regulations (CFR) 60.

³ United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Questions, www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm, accessed August 11, 2023.

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.”⁴

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.⁵

Within historic districts, properties are identified as contributing or 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.

⁴ *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 5.*

⁵ *United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, p. 12.*

(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
- D. Have yielded, or may be likely to yield, information important in prehistory or history.⁶

(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.”⁷ 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.”⁸ The

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

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

⁸ *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 44.*

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 criteria discussed above, and possess integrity as defined above.⁹ 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.¹⁰ 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

⁹ *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 25.*

¹⁰ *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 41.*

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

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.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 materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

(c) Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.¹²

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.*

(d) Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.¹³

(e) Archaeological Data Preservation Act

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

(2) State

(a) California Environmental Quality Act

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

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

¹² *United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, www.nps.gov/subjects/archeology/nagpra.htm#:~:text=NAGPRA%20addresses%20the%20repatriation%20and,Tribes%2C%20and%20Native%20Hawaiian%20organizations., accessed August 11, 2023.*

¹³ *United States Department of the Interior, National Park Service, Technical Brief #20: Archeological Damage Assessment: Legal Basis and Methods, 2007.*

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.¹⁴ 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 resource nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.¹⁵

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."¹⁶ According to

¹⁴ *California Public Resources Code Section 21083.1(a).*

¹⁵ *State CEQA Statute and Guidelines Section 15064.5(c)(4).*

¹⁶ *State CEQA Guidelines Section 15064.5(b)(1).*

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.

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.¹⁷

(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.”¹⁸ 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.¹⁹ 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:

¹⁷ *State CEQA Guidelines Section 15064.5(b)(3).*

¹⁸ *California Public Resources Code Section 5024.1[a].*

¹⁹ *California Public Resources Code Section 5024.1[b].*

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.

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 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 that 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.²⁰

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) City of Los Angeles General Plan—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 Central City Community Plan includes the following objectives and policies related to historical resources that are applicable to the Project:

- Objective 10-1: To ensure that the arts, culture, and architecturally significant buildings remain central to the further development of downtown and that it remains clearly discernable and accessible to all citizens in and visitor to Los Angeles.
 - Policy 10-1.4: Ensure that the Downtown circulation system serves the existing arts and cultural facilities with ease of accessibility and connections.
- Objective 10-2: To maintain and reuse one of the largest and most distinguished sets of under used historic buildings in the United States.

²⁰ *City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5.*

- 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 10-2.3: Establish district-specific preservation policies and programs consistent with the goals and each area. Encourage a mix of uses in developing adaptive reuse projects.
- Policy 10-2.4: Facilitate the construction of parking garages to support new and existing buildings in the Center City, encouraging shared parking between new development and historic buildings.
- Policy 10-2.5: Encourage the transformation of Broadway Downtown to include the adaptive reuse of historic buildings for arts, cultural, entertainment, restaurant, and retail uses as well as infrastructure improvements such as sidewalk rebuilding and streetscape and landscape improvements in conjunction with major public transit expenditures.
- Policy 10-2.7: Utilize historic buildings to accommodate office space within the Civic Center boundaries.

(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 criteria listed below. 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.²¹

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 the Department of City Planning's Office of Historic Resources (OHR) staff often ask the following questions:

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

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, Los Angeles Municipal Code (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

²¹ *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

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 LAMC Section 19.05. 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.”²²

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

The Los Angeles City Council adopted the ordinance enabling the creation of HPOZs in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.²³ Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.²⁴ For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

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

SurveyLA is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City’s history. The survey and

²² *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

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

²⁴ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

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 former Community Redevelopment Agency of the City of Los Angeles (CRA/LA). 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 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

The Historical Report includes a detailed description of the historical background and context of the Project Site and surrounding area. Below is a summary of the discussion included in the Historical Report.

(1) Existing Uses

As discussed in Section II, Project Description of this Draft EIR, the Project Site comprises an entire City block that is currently occupied by The Bloc, a mixed-use complex that includes an office tower, a high-rise hotel, commercial/retail uses, an expansive plaza that includes a portal to the Metro 7th Street/Metro Center Station, and approximately 1,971 parking spaces. The southern portion of the Project Site (the Development Area) is currently developed with an existing 9-story podium building, which includes five stories of enclosed parking, four stories of existing commercial/retail floor area, and one level of rooftop parking.

(a) Historical Background and Context of the Project Site

(i) Background and Construction History

As discussed above, the Project Site is occupied by a mixed-use complex, currently known as The Bloc that is composed of several distinct components, including a hotel, office, parking, and retail commercial/retail uses. These buildings are described as a single building in the Historical Report, however this Draft EIR refers to The Bloc in its entirety as a mixed-use complex, with certain components referred to as individual buildings. Historically known as Broadway Plaza, the mixed-use complex was a joint development of Broadway-Hale Stores Inc. and Ogden Development Corp. The background and history leading up to the development of Broadway Plaza is described below.

As described in the Historical Report, in 1950, The Broadway Department Stores merged with the Hale Brothers Stores to form Broadway-Hale Stores Inc. The two chains, The Broadway (based in Los Angeles) and Hale Brothers (based in San Francisco), retained their respective names and operated as separate divisions, while the parent company continued to grow through the acquisition of other chains. The Broadway was one of four major department stores that emerged in Downtown Los Angeles at the end of the 19th century. The Broadway was founded in 1896 by Arthur Letts, an English immigrant, who purchased a bankrupt store at Broadway and 4th Street, which was named after the street it faced. When Bullock's, in 1907, and Hamburger's, in 1908, moved to larger buildings, Letts decided to stay put but expand. Although the building was constructed in phases, it reflected a cohesive Beaux Arts design by architects John Parkinson and Edwin Bergstrom.

By the 1920s, 7th Street was already competing with Broadway as the main shopping district Downtown. While The Broadway was expanding its reach geographically during the post-war era, it was beginning to reconsider the size of its flagship store at Broadway and 4th Street.

By the late 1960s, The Broadway no longer needed so much square footage but was not prepared to abandon Downtown given the City's plans for redevelopment, mainly the Los Angeles Convention Center and United California Bank Building, both designed by Charles Luckman Associates. Edward W. Carter, president of Broadway-Hale Stores Inc. and Charles Luckman, chairman of Charles Luckman Associates and president of Ogden Development Corp. joined forces to develop a complex that would include an office building in the newly emerging financial district, a hotel that would service the convention center, and a department store that would be supported by an indoor shopping center and parking structure. The location selected for this complex was the home of the Young Men's Christian Association (YMCA) since 1908. The YMCA building at 715-29 South Hope Street dominated the block that was otherwise comprised of small commercial buildings and parking lots.

The partnership between Broadway-Hale Stores Inc. and Ogden Development Corp. was fundamentally based upon the relationship between Edward W. Carter and Charles Luckman. Both were of Russian Jewish ancestry, approximately the same age, lived in Bel Air, and used their good fortune to support public education and the arts. They were also both involved with plans for the redevelopment of Downtown during the late 1960s.

In 1968, Broadway-Hale Stores Inc. announced plans for the construction of a suburban-type shopping center in Downtown that would include a new flagship store for The Broadway. Carter took out an option for the YMCA building on Hope Street. Meanwhile, Ogden Development Corp. was developing plans for a companion development on the same block. Not coincidentally, Charles Luckman Associates was the architect for both projects. By 1969, the two projects had merged into one fully integrated project with a hotel, office building, two-level shopping mall, three-level department store, and six-level above-ground parking structure.

The construction of a new department store in Downtown was contrary to changes in retail trends after World War II that favored suburban shopping centers. At 250,000 square feet, the new flagship store was larger than other department store buildings constructed at the time but substantially smaller than the old flagship store at Broadway and 4th Street. Carter was counting on a growing Downtown residential population from new apartment buildings on Bunker Hill, a growing Downtown tourism industry from the Convention Center, and a growing Downtown daytime work force from new skyscrapers in the Financial District. When it opened in 1973, Broadway Plaza was lauded as the first large hotel in 20 years and first major department store in 50 years to be constructed in

Downtown. Approximately one-third of the office building was already leased, and the shopping mall included brands, such as Silverwoods, Hallmark, Casual Corner, Oshman's Sporting Goods, and Waldenbooks as well as other non-chain shops and a food court.

(ii) Architectural Description

The existing uses on the Project Site are located within a mixed-use complex is comprised of several distinct components. The below ground levels of the mixed-use complex include a loading dock, as well as parking, commercial, storage, and hotel conference space. The main entrance to the mixed-use complex is located on 7th Street on the street level. The street level currently consists of a shopping mall flanked by the hotel on the east and the office building on the west. These three components of the mixed-use complex occupy the north half of the block. As originally designed, the shopping mall was covered by a gigantic steel-framed roof with a skylight. The skylight structure was removed as part of renovations in 2014, as discussed further below. In the center of the entrance are an escalator and stairway that lead down to the plaza level. There are secondary entrances to both the plaza level and street level from Hope and Flower Streets.

The southern half of the block is occupied by the 9-story podium structure that contains five levels of enclosed parking and four levels of retail uses, which are accessed through the shopping mall at the street and plaza levels, and rooftop parking. The architectural base of the mixed-use complex and the entirety of the podium structure are sheathed in red brick that has been either painted or removed. The parking levels in the podium structure are apparent from the perforations in the brick walls for ventilation. The lobby for the office building, commonly referred to as the 700 Flower Street Building, is located at the street level. The 33-story office building is rectangular in shape and sheathed in alternating horizontal bands of black aluminum and bronze glass. The main entrance to the hotel is located on Hope Street and recessed within a port cochere. There is also access between the hotel and shopping mall at the street and plaza levels. The 26-story hotel is generally rectangular in shape and originally featured a revolving circular restaurant on the roof. The hotel building is also sheathed in black aluminum and bronze glass, but the muntin²⁵ pattern is different from the office building.

(iii) Alterations

In 1996, Broadway Plaza was renamed Macy's Plaza when The Broadway chain was bought by Macy's. In 2005, the Hyatt Regency was renamed the Sheraton Los Angeles Downtown. Although tenants changed over time, the mixed-use complex remained substantially unaltered until 2014, when Macy's Plaza was rebranded to The

²⁵ Vertical dividers that separate glass panes in a window.

Bloc, and plans were developed for a major renovation. A key component of the 2014 renovation was making the mixed-use complex more pedestrian friendly. The inward-facing mixed-use complex became more outward-facing by the removal of the skylight structure; the enclosed shopping mall was made an open-air plaza visible from 7th Street; the department store, hotel, and office building were remodeled from top to bottom; the restaurant on top of the hotel became a lounge and gym for guests; and the structure no longer revolves. Other alterations involved changes to the vertical circulation, including elevators, stairs, and escalators, and to the floor plans, including demising walls and corridors. The renovation also included the creation of a pedestrian portal to the Metro 7th Street/Metro Center Station through the mixed-use complex and openings to Hope Street and Flower Street, which was completed in 2017. As new restaurants and shops moved into the garden, plaza, and second levels, tenant improvements further replaced the once-uniform red brick with individually designed storefronts.

(2) Brief History of the Area

The Central City Community Plan area is characterized by an extraordinarily diverse built environment and is somewhat informally divided into several smaller neighborhoods, each of which has a unique identity and physical character. While the specific names and boundaries of neighborhoods are subject to interpretation and can vary widely across sources, the Central City Community Plan identifies nine neighborhoods within the Community Plan area: Bunker Hill, Central City East, Civic Center, Convention Center, Fashion District, Financial District, Historic Core, Little Tokyo, and South Park.

The Project Site is located in the Financial District, which is located to the south of Bunker Hill and to the west of the Historic Core. This urban landscape is dominated by contemporary office towers that are occupied by banks, financial institutions, law firms, and corporate interests. Many of the City's tallest buildings are concentrated in the Financial District or nearby in Bunker Hill. When it was completed in 1973, the United California Bank Building, now called the Aon Center, was the tallest building in the City and remained so until 1989. While the Financial District consists largely of buildings that were constructed after World War II, the area also includes several earlier commercial buildings, especially near its eastern edge and along 7th Street. During the early 20th century, 7th Street began to compete with Broadway as a shopping district.

In the late 19th and early 20th centuries, the City witnessed a tremendous increase in retail outlets that were the source of fashionable goods for the growing population. By 1901, Downtown Los Angeles boasted four department and dry goods stores, all located between the 200 and 400 blocks of Broadway. These were The Broadway Department Store, Ville de Paris, Boston Dry Goods Company, and Coulter's Dry Goods Company. As sales grew at these stores, so did their buildings and locations. The Broadway shopping district shifted south in 1906, when Hamburger's Department Store opened in a new

building at Broadway and 8th Street. In 1915, the J.W. Robinson Company (formerly called the Boston Dry Goods Company) constructed a building at 7th Street and Grand Avenue, which firmly established 7th Street as a new shopping district. Foreman & Clark, Coulter's, and Ville de Paris soon followed suit by moving from Broadway to 7th Street in the 1920s. These five stores anchored the 7th Street shopping district through the 1960s when Downtown began to fade as the major commercial retail center of the City.

(3) Historical Resources

(a) Project Site

As discussed in the Historical Report and in Subsection 3.d.(1)(a), below, existing improvements on the Project Site are not currently listed under the National Register, California Register, or local landmark or historic district programs and have not been identified in any previous historic resource surveys. A records search prepared by the South Central Coastal Information Center (SCCIC) revealed no prior evaluations of the Project Site. The Project Site was not identified as a potential historical resource by *SurveyLA*. The Project Site is located within the boundaries of the 7th Street Commercial Historic District but was identified by *SurveyLA* as non-contributing.

(b) Historical Resources in the Study Area

As defined in the Historical Report, the Study Area includes all properties within a 1,000-foot radius from the center of the Project Site. Parcels beyond this Study Area were not included because the Project would have no potential to directly or indirectly impact the buildings on these distant parcels or their surrounding setting. As shown in Figure IV.B-1 on page IV.B-23 and Figure IV.B-1 on page IV.B-22, the Historical Report identified 20 historical resources in the vicinity of the Project Site, including 19 individual properties and one historic district. As noted in the Historical Report, not all of the identified properties are officially designated historical resources. For the purposes of the analysis, historical resources in the Study Area are those that are listed, as well as those previously evaluated as eligible for listing under national, state, and local landmark and historic district programs. Each of the identified historical resources is described as follows:

- 1. Engine Company No. 28** is located at 644 South Figueroa Street, approximately 500 feet northwest of the Project Site. Constructed in 1912, the three-story building served as an operating fire station until 1967. In the late 1980s, it was rehabilitated and adaptively reused as a restaurant. The building is individually listed in the National and California Registers and designated LAHCM No. 348.

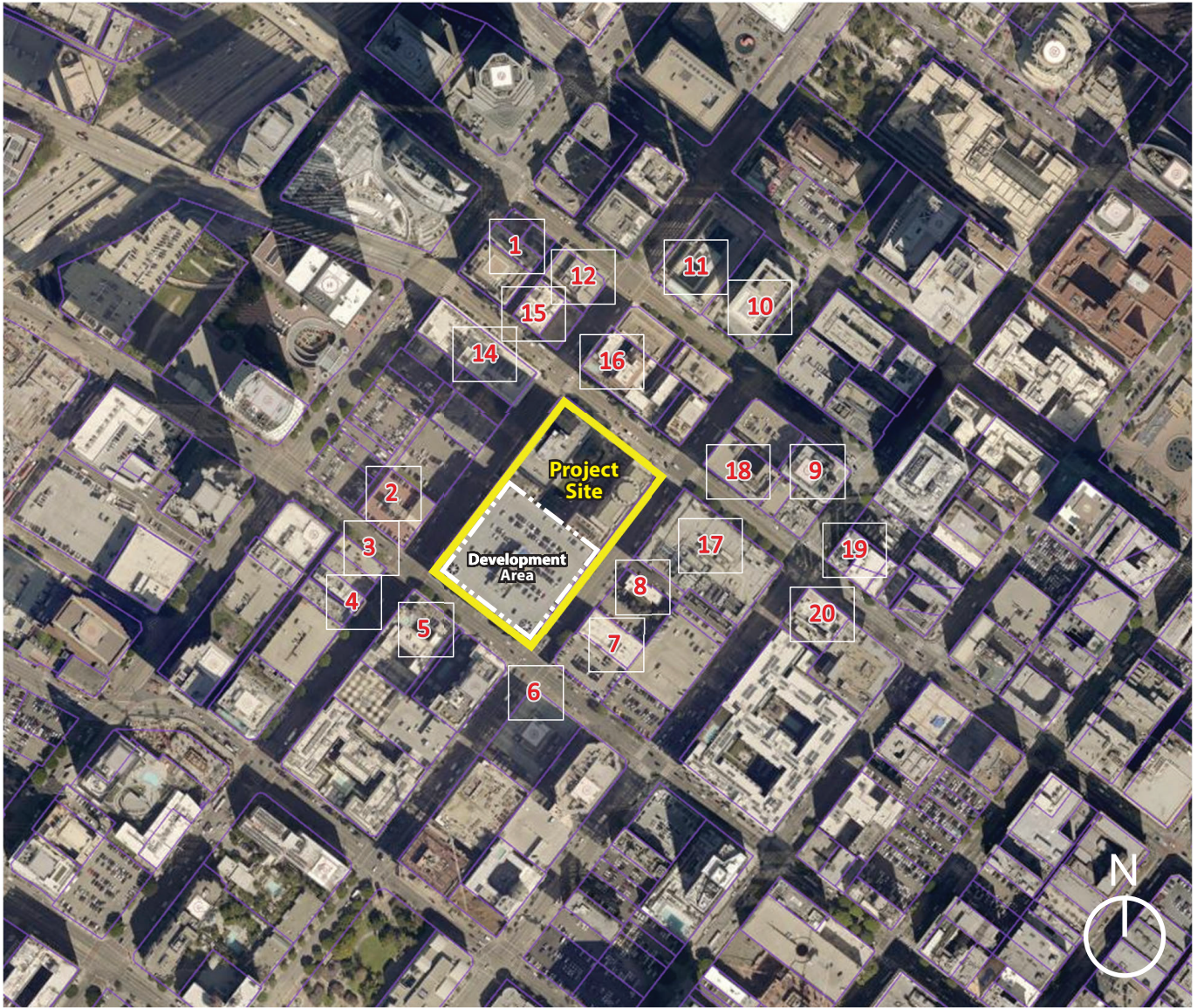
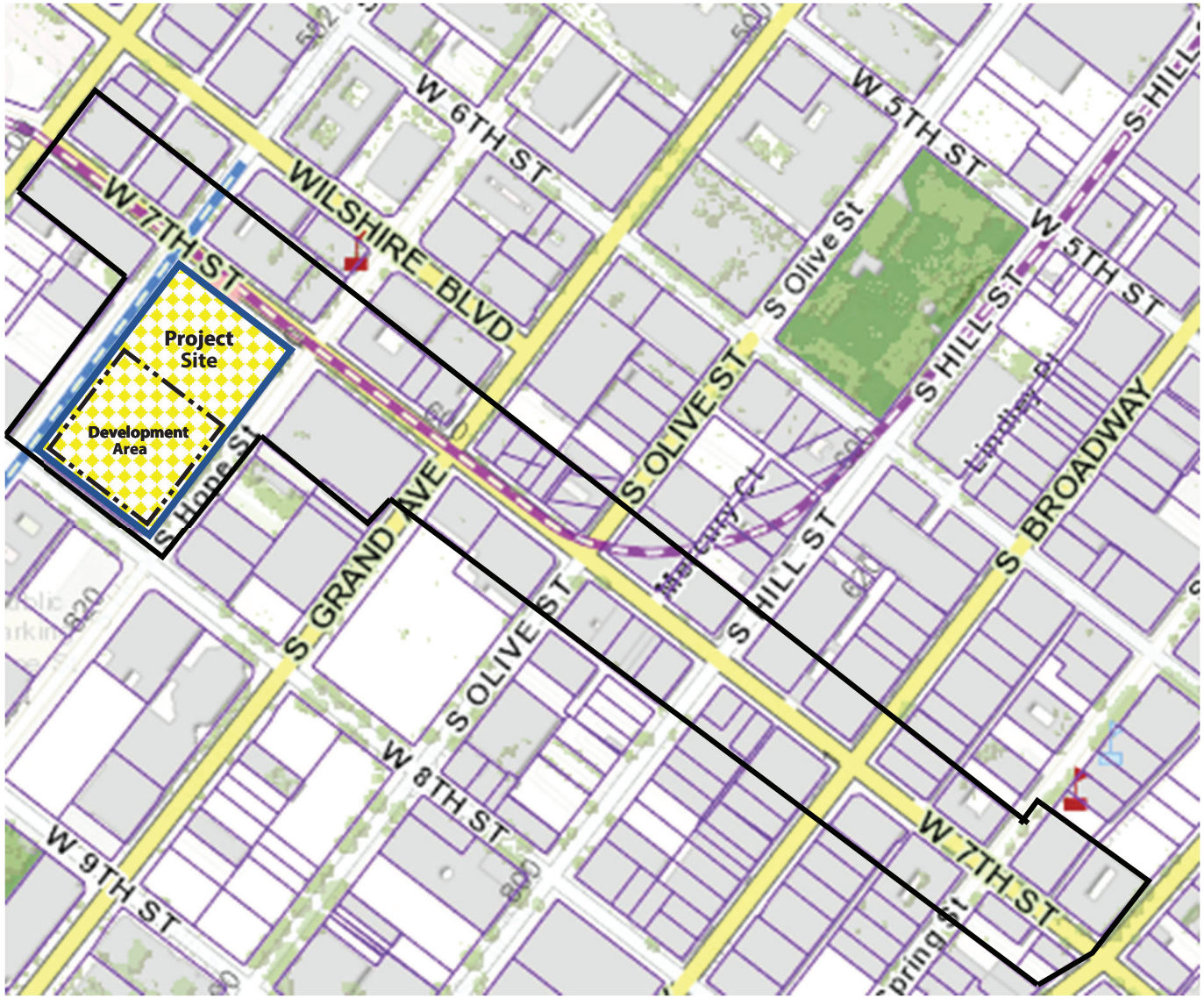


Figure IV.B-1
Historical Resources in the Study Area



LEGEND

-  7th Street Commercial Historic District
-  Project Site



Figure IV.B-2
7th Street Commercial Historic District

2. **The General Petroleum Corporation Parking Garage** is located at 757 South Flower Street, approximately 465 feet west of the Project Site. The six-level parking structure was constructed in 1946. It was evaluated by SurveyLA as appearing eligible for listing in the National and California Registers and local register as an excellent example of a 1940s parking structure in Downtown and as the work of the noted architecture firm Wurdeman and Becket. Built for the General Petroleum Company, this was the first parking structure erected under a 1946 City ordinance that required new commercial buildings to provide parking. Its design employs an innovative, corkscrew-style configuration that was lauded for its efficiency.
3. **The Sawyer Building** is located at 801 South Flower Street, approximately 0.10 mile southwest of the Project Site. The five-story commercial building was constructed in 1931. It was evaluated by SurveyLA as appearing eligible for listing in the California Register and local register as an excellent example of the Public Works Administration Moderne style in Downtown and as the work of the noted architect Edwin Bergstrom. Due to alterations, including window replacement and storefront modifications, the building may not retain sufficient integrity for listing in the National Register.
4. **The Milner Hotel** is located at 813 South Flower Street, approximately 0.12 mile southwest of the Project Site. The 11-story hotel building was constructed in 1923. It was evaluated by SurveyLA as appearing eligible for listing in the California Register and local register as an excellent example of the Renaissance Revival style in Downtown and as the work of the noted architecture firm Curlett and Beelman. Due to alterations, including window replacement and storefront modifications, the building may not retain sufficient integrity for listing in the National Register.
5. **Southern California Gas Company Complex** is located at 800–26 South Flower Street, approximately 0.10 mile south of the Project Site. The Southern California Gas Company Complex is a three-building complex constructed as the headquarters of the Southern California Gas Company. The original building was designed by the noted architecture firm Parkinson and Parkinson, while the south addition was designed by the architect Robert V. Derrah and the north addition was designed by the architecture firm A.C. Martin and Associates. In the early 2000s, the buildings were rehabilitated and adaptively reused as lofts. The complex is individually listed in the National and California Registers and designated LAHCM No. 789.
6. **This air raid siren** is located southeast of the Project Site at the corner of 8th and Hope Streets, immediately across the Project Site. It was evaluated by SurveyLA as appearing eligible for listing in the National and California

Registers and local register for its association with the civil defense system created during World War II and the Cold War.

7. **Auto Center Garage** is located immediately east of the Project Site at 746 South Hope Street. This eight-level parking structure was constructed in 1925. It was evaluated by SurveyLA as appearing eligible for listing in the National and California Registers and local register as an excellent example of a 1920s parking structure in Downtown. It is one of the earliest known examples of a parking structure in the City.
8. **Third Church of Christ Scientist Reading Room** is located immediately east of the Project Site at 730 South Hope Street. The Third Church of Christ Scientist Reading Room was constructed as a reading room for the Third Church of Christ Scientist, which was located on an adjacent property. It was evaluated by SurveyLA as appearing eligible for listing in the National and California Registers and local register as an excellent example of a 1930s religious building in Downtown.
9. **The Wilshire Grand Building** is located at 600 West Wilshire Boulevard, approximately 0.14 mile northeast of the Project Site. The 16-story commercial building was constructed in 1980. It was evaluated by SurveyLA as appearing eligible for listing in the California Register and local register as an excellent example of the Glass Skin style in Downtown and as the work of the noted architecture firm Gin Wong and Associates. As the building is less than 50 years of age and not of exceptional importance, it was not eligible for listing in the National Register at the time of the survey.
10. **The United California Bank Building**, now called the Aon Center, is located at 707 West Wilshire Boulevard, approximately 0.14 mile north of the Project Site. The 62-story commercial building was completed in 1973. It was evaluated by SurveyLA as appearing eligible for listing in the California Register and local register as an excellent example of the Corporate International style in Downtown and as the work of the noted architecture firm Charles Luckman and Associates. As the building is less than 50 years of age and not of exceptional importance, it was not eligible for listing in the National Register at the time of the survey.
11. **The General Petroleum Building**, now called the Pegasus Apartments, is located at 612 South Flower Street, approximately 0.13 mile north of the Project Site. When completed in 1949, it was not only the first major office building constructed Downtown after World War II but the largest in the City. Limited by the 150-foot height limit in effect at that time, the architects opted to expand the building's footprint. In the early 2000s, it was rehabilitated and adaptively

reused as lofts. The building is individually listed in the National and California Registers and designated LAHCM No. 766.

- 12. The 800 Wilshire Boulevard Building** is located at 800 West Wilshire Boulevard, approximately 460 feet northwest of the Project Site. The 16-story commercial building was constructed in 1971. It was evaluated by SurveyLA as appearing eligible for listing in the California Register and local register as an excellent example of the Corporate International style in Downtown and as the work of the noted architecture firm Welton Beckett and Associates. As the building is less than 50 years of age and not of exceptional importance, it was not eligible for listing in the National Register at the time of the survey.
- 13. 7th Street Commercial Historic District** (Historic District) was identified by SurveyLA as appearing eligible for listing in the National and California Registers and for listing as an HPOZ. The Historic District contains an excellent concentration of Beaux Arts commercial architecture and other architectural styles. It also reflects early 20th century commercial development and the growth of the City's central business district. The period of significance is 1906–1928, which accounts for the primary period of development. The Historic District includes several contributing buildings that are individually listed in the National and California Registers and local register. Several others contribute to the Spring Street Financial District and the Broadway Theater and Commercial District (both listed in the National Register), which intersect this Historic District.
- 14. Barker Brothers Building** is located immediately west of the Project Site on the opposite side of Flower Street at 800-98 West 7th Street. This 12-story building was constructed as the headquarters of the Barker Brothers furniture store in 1925. It is an excellent example of the Renaissance Revival style in Downtown and the work of the noted architecture firm Curlett and Beelman. In the late 1980s, it was renovated for general office space on the upper floors and retail space on the ground floor. The building was formally determined eligible for listing in the National Register, listed in the California Register, and designated LAHCM No. 356. Additionally, it was identified by SurveyLA as appearing eligible for listing in the National and California Registers and local register as a contributor to the Historic District.
- 15. The Fine Arts Building** is located at 807-15 West 7th Street, approximately 365 feet northwest of the Project Site. This 12-story commercial building was constructed in 1926. It is an excellent example of the Renaissance Revival style in Downtown and the work of the noted architecture firm Walker and Eisen. The building was formally determined eligible for listing in the National Register, listed in the California Register, and designated LAHCM No. 125. Additionally, it

was identified by SurveyLA as appearing eligible for listing in the National and California Registers and local register as a contributor to the Historic District.

- 16. The Roosevelt Building** is located immediately north of the Project Site at 727 West 7th Street. Constructed in 1926, the 12-story commercial building was rehabilitated and adaptively reused as lofts in the late 2000s. It is an excellent example of the Renaissance Revival style in Downtown and the work of the noted architecture firm Curlett and Beelman. The building is individually listed in the National and California Registers and designated LAHCM No. 355. Additionally, it was identified by SurveyLA as appearing eligible for listing in the National and California Registers and local register as a contributor to the Historic District.
- 17. The J.W. Robinson's Department Store** is located at 600–32 West 7th Street, approximately 0.14 mile east of the Project Site. This seven-story commercial building was constructed in 1915. Although this location was three blocks west of the established shopping district on Broadway, this Robinson's Department Store achieved rapid success and attracted other retail stores to 7th Street. In 1923, a seven-story annex was constructed on the south side of the building. The building's original Beaux Arts style details were removed in 1934, when the building was updated to have a simpler exterior. After the department store closed in the 1990s, the upper floors were converted into a telecommunications center and retail space on the ground floor. The building was formally determined eligible for listing in the National Register, listed in the California Register, and designated LAHCM No. 357. Additionally, it was identified by SurveyLA as appearing eligible for listing in the National and California Registers and local register as a contributor to the Historic District.
- 18. The Union Oil Building** is located at 617 West 7th Street, approximately 520 feet northeast of the Project Site. The 12-story commercial building was constructed in 1923, and designed by the noted architecture firm Parkinson and Bergstrom. It was identified by SurveyLA as appearing eligible for listing in the National and California Registers and local register as a contributor to the Historic District. It was not evaluated as individually eligible, presumably due to alterations, including window replacement and storefront modifications.
- 19. The Quinby Building** is located at 529 West 7th Street, approximately 0.16 mile northeast of the Project Site. The 13-story commercial building was constructed in 1926. It was evaluated by SurveyLA as appearing eligible for listing in the National and California Registers and local register as an excellent example of the Beaux Arts style in Downtown and as the work of the noted architecture firm Meyer and Holler. Additionally, it was identified by SurveyLA as appearing

eligible for listing in the National and California Registers and local register as a contributor to the Historic District.

20. The Brockman Building is located at 520-30 West 7th Street, approximately 0.2 mile east of the Project Site. This 12-story commercial building was constructed in 1917. It is an excellent example of the Beaux Arts style in Downtown. The building was formally determined eligible for listing in the National Register and listed in the California Register. Additionally, it was identified by SurveyLA as appearing eligible for listing in the National and California Registers and local register as a contributor to the Historic District.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

For this analysis, the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate potential impacts to historic resources.

Would the project result in a substantial adverse change in the significance of an historical resource due to:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;

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

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.²⁶ A substantial adverse change in the significance of an historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.²⁷

b. Methodology

The Historical Report is based, in part, on a field inspection of the Project Site, Sanborn Fire Insurance maps, historic aerial photographs, prior survey data, newspaper archives, local histories, the Los Angeles Historic Resources Inventory, the Built Environment Resources Directory (BERD), HistoricPlacesLA, and a review through an SCCIC records search of the California Historic Resources Inventory System (CHRIS) database, including a review of the National Register and its annual updates, the California Register, listed and determined eligible for listing in the California Register, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resource surveys and other planning activities. Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so, (2) a determination of whether the project would result in a “substantial adverse change” in the significance of the resource or resources.

c. Project Design Features

No specific project design features are proposed with regard to historic resources.

d. Analysis of Project Impacts

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

²⁶ CEQA Guidelines, Section 15064.5(b).

²⁷ CEQA Guidelines, Section 15064.5(b)(1).

(1) Impact Analysis

(a) Evaluation of Eligibility for Buildings on the Project Site

As discussed in the Historical Report, since the eligibility criteria for local HCM designation align in large degree with the eligibility criteria of the National Register and the California Register, the following evaluation considers eligibility under each of the criteria at the federal, State, and local levels under a single heading (Criterion National Register/California Register/Local). For a property to be considered a historical resource under CEQA, it need only appear eligible for designation under one criterion.

As stated in the Historical Report, the significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. The contexts, themes, and sub-themes discussed below were drawn from the Los Angeles Citywide Historic Context Statement (LACHCS) and are relevant in judging the significance of the Project Site.

(i) Commercial Merchants, Leaders, and Builders, 1850–1980

Within the Commercial Development context, the Project Site is best evaluated under Criterion B/2/2 within the theme Commercial Merchants, Leaders, and Builders. The narrative developed for this theme as part of the LACHCS does not identify individuals who made significant contributions to the commercial development of Los Angeles. Instead, this narrative provides overall guidance for how to evaluate properties within this theme. The persons most closely associated with the complex are Edward Carter and Charles Luckman, who were each described in detail in the Historical Report.

(ii) L.A. Modernism, 1919–1980

Within the Architecture and Engineering context, the complex is best evaluated under Criterion C/3/3 within the sub-context L.A. Modernism. Because the mixed-use complex does not perfectly align within one specific sub-theme, the two most applicable themes are discussed in the Historical Report, which include the Glass Skin and Brutalism sub-themes within the Late Modern theme. Applying the qualities of exaggeration, mutation, and paradox to Modernist architectural language, Late Modernism was a distinct reaction against Modernism. Late Modernism expresses the conditions and new developments of Western society between 1965 and 1990, including the advent of late capitalist and post-industrial culture, to which Late Modern architecture is internationally associated.

(iii) Project Site Evaluation

Criterion A/1/1:^{28,29} Is the property associated with events that have made a significant contribution to the broad patterns of our history and cultural heritage?

As discussed in the Historical Report, there are no particular themes within the Commercial Development context of the LACHCS that apply to the Project Site under Criterion A. When it opened in 1973, Broadway Plaza, was extolled as the first large hotel in 20 years and first major department store in 50 years to be constructed Downtown. In the context of hotels or department stores, however, it was one of many in the Hyatt and The Broadway chains that were both expanding in the 1970s. In the broad context of commercial development, the complex was part of the larger effort to reverse the decline of Downtown. This effort was mostly spearheaded by the former CRA/LA. The Redevelopment Plan for Bunker Hill was adopted in 1959 and focused on clearing blight and preparing land for redevelopment, which included re-grading the hill and creating a new street system.

As detailed in the Historical Report, the transformation of the Financial District was more successful than Bunker Hill, and, by the time the Central Business District Redevelopment Plan was adopted in 1975, many new buildings in the Financial District had been constructed and others were already planned. While development was occurring on Bunker Hill during this same period, the pace was slow, and many parcels remained vacant until the 1980s.

As discussed in the Historical Report, while the complex was initially a financial success, it did not have a lasting impact on the commercial development of Downtown. It was part of an established trend of development in the Financial District that was initiated in the late 1950s and early 1960s. It did not become a prototype for the redevelopment of downtowns in the United States and did not rejuvenate downtown nightlife in the City as hoped. Although the developers claimed that the combination of uses within a single large structure was unlike any other, there were in fact others being developed at the same time. Referred to as omni centers, examples include Crown Center master planned by Edward Larabee Barnes in Kansas City, Missouri and Baystate West designed by Edward Catalano with Pietro Belluschi in Springfield, Massachusetts. Mere association with historic events or trends is not enough, in and of itself to qualify under Criterion A. The property's specific association must be considered important as well. Therefore, the Project Site is not eligible under Criterion A/1/1.

²⁸ *National Register Criterion/California Register Criterion/Local (HCM) Criterion.*

²⁹ *The three criteria for significance in the Los Angeles Cultural Heritage Ordinance are essentially the same as criteria A/1, B/2, and C/3 for listing in the National and California Registers and these are evaluated together herein.*

Criterion B/2/2:³⁰ Is the property associated with the lives of persons important in our past?

The two people most closely associated with the Project Site are Edward Carter and Charles Luckman, who were both involved with its development. Research did not reveal specific information regarding tenants of the property, such as the office building or shopping center components, who could be considered persons significant in our past.

Edward Carter was associated with The Broadway chain of department stores from 1945 to 1983. Under his leadership, Carter expanded the company from three stores in the City to a multitude of stores throughout the Southwest. Early in his tenure as chief executive, Carter oversaw the development of one of the nation's first suburban shopping centers. He also spearheaded the acquisition of other important chains in the United States, such as Neiman Marcus and Bergdorf Goodman. Although Carter was significant in the context of business and commerce, Carter's association with the Project Site was purely financial, and it does not represent his productive life in comparison with other properties. Therefore, the Project Site is not eligible under Criterion B/2/2.

Charles Luckman's accomplishments are tied to the sale and production of consumer goods rather than real estate development. The success of Pepsodent is credited to Luckman's advertising campaigns, which involved the new medium of television. In 1946, Luckman's skills in sales and marketing catapulted him to the presidency of Lever Brothers. However, Luckman did not find the same success in the real estate business. In 1968, Luckman became president of Ogden Development after moving to the City in 1950 to practice architecture. Although the company was involved with several major developments, the complex was the only project completed. Although Luckman was significant in the context of business and commerce, Luckman is not significant in the context of real estate development, and the Project Site post-dated his career in the manufacturing business. Therefore, the Project Site is not eligible under Criterion B/2/2.

Criterion C/3/3:³¹ Does the property embody 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?

³⁰ The three criteria for significance in the Los Angeles Cultural Heritage Ordinance are essentially the same as criteria A/1, B/2, and C/3 for listing in the National and California Registers, and these are evaluated together herein.

³¹ The three criteria for significance in the Los Angeles Cultural Heritage Ordinance are essentially the same as criteria A/1, B/2, and C/3 for listing in the National and California Registers, and these are evaluated together herein.

Type, Period, or Method of Construction

The Bloc may be broadly described as Late Modern in terms of the period of its construction; however, it neither embodies a particular style of architecture during the period nor is a successful combination of styles. The hotel and office buildings exhibit the basic features of the Glass Skin style but lack the distinctive features of important examples, such as sculptural forms and seamless mirrored glass surfaces. The hotel and office buildings are ordinary examples of glass box architecture from the period, of which there are many. They are not unique in shape or color, and, despite their similarities, they do not complement one another as with the twin towers at Arco Plaza by A.C. Martin & Associates or Century Plaza Towers by Minoru Yamasaki. It is not uncommon for Glass Skin buildings to rise from a base of a different material, which is the case with The Bloc. Historically, the architectural base around the shopping mall, department store, and parking podium was sheathed in red brick. In many places along the lower levels, the brick has been removed, and, in other places, it has been painted. The base was akin to Brutalist buildings from the period in its monolithic appearance. Although most examples of Brutalism feature poured concrete, brick examples exist; perhaps the most notable is the Indian Institute of Management in Ahmedabad by Louis Kahn. However, it was precisely the monochromatic color palette and fortress-like exterior that the 2014–2020 renovation sought to change.

As described in the Historical Report, architectural periodicals and books did not yield any results indicating that the mixed-use complex was considered an important work during its time or in subsequent decades. As the mixed-use complex is not a significant example of an architectural style, it does not appear to be significant for embodying the distinctive characteristics of its type or period of construction. Additionally, it did not involve any novel or noteworthy construction techniques, so it does not appear to be significant for embodying the distinctive characteristics of a method of construction. The most distinctive characteristic of the property is its large size. However, full-block developments were typical of the era, and there are other earlier examples in Downtown, such as Union Bank Square, the Harbor Freeway, and Arco Plaza. Therefore, this aspect of Criterion C/3/3 does not apply.

Work of a Master

As described in the Historical Report, the mixed-use complex was designed by the architecture firm of Charles Luckman Associates. Luckman's role in the design as opposed to the development is unclear as he resigned as president of the firm in 1968. As he was still board chair, it is assumed that he participated in the design but was not personally responsible.

Although the work of Charles Luckman Associates includes a few notable projects (e.g., the Forum in Inglewood and the U.S. Pavilion for the World's Fair in New York), it has

not been demonstrated that Luckman or the members of his firm were master architects. Most of the work is noteworthy only for its scale as opposed to the quality of its design. Indeed, there are many projects that have been derided as commonplace and even destructive at times; the new Madison Square Garden is a prime example of the latter, as discussed in the Historical Report. Based on the above, this aspect of Criterion C/3/3 does not apply.

High Artistic Values

As described in the Historical Report, the existing mixed-use complex does not possess ornamentation and detail to lend it high artistic value. Therefore, this aspect of Criterion C/3/3 does not apply.

Distinguishable Entity

As previously discussed, the Project Site is located within the boundaries of the Historic District identified by SurveyLA. However, SurveyLA identified the Project Site as non-contributing because it post-dates the period of significance of 1906 to 1928. Therefore, this aspect of Criterion C/3/3 does not apply.

Criterion D/4:³² Has the property yielded, or may be likely to yield, information important in prehistory or history?

As described in the Historical Report, the existing mixed-use complex did not involve the use of any novel or noteworthy construction techniques. Furthermore, research did not indicate the mixed-use complex to have the potential to yield information about the history of commerce. The mixed-use complex cannot be reasonably expected to yield information important in prehistory or history; therefore, it is not eligible under Criterion D/4.

Integrity

To be eligible for listing in the National Register, properties must retain their physical integrity from the period of significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the period of significance is usually measured by the length of the associations. As the Project Site is not significant under any of the National Register criteria, it has no period of significance and an assessment of its integrity is not required.

(b) Direct Impacts

³² *Unlike the National and California Registers, the City Ordinance for HCM designation does not consider this aspect.*

As determined in the Historical Report and summarized above, there are no historical resources on the Project Site, and, as such, no historical resources would be demolished, destroyed, relocated, or altered as a result of the Project. **Therefore, potential direct impacts to historical resources as a result of development of the Project would be less than significant.**

(c) Indirect Impacts

(i) Individual Properties

As discussed in Subsection 2.b.(3)(b), above, there are 20 historical resources in the vicinity of the Project Site, including 19 individual properties and one historic district.

Because the Project would not alter the physical characteristics of the historical resources listed, the only relevant aspect of integrity with respect to the impact of the Project on these historical resources is setting. The setting refers to the character of the place in which historical resources and the Project are located and its surrounding areas. Typically, setting is considered a more important aspect of integrity for conveying historic associations than for conveying architectural significance. As shown in Figure IV.B-1 on page IV.B-23, none of the historical resources are within the same block as the Project Site, and all of the historical resources are separated from the Project Site by a street and, in some cases, by intervening buildings. As determined in the Historical Report, since the Project Site is located outside the parcel boundaries of the 19 historical resources in the Study Area, the Project would not impact their integrity of immediate setting. The individual historical resources along 7th Street and to the north would not be affected by the Project due to the significant physical and visual separation between these historical resources and the Project. As the Project residential tower would be built within and above the existing parking/retail podium building along Hope Street, the proposed tower would be separated from the historical resources to the north by the existing 26-story hotel and 33-story office components of the Project Site.

As shown in Figure IV.B-1, the Project would be situated across the street from five historical resources, including the General Petroleum Corporation Parking Garage, the Sawyer Building, the Southern California Gas Company Complex, the Air Raid Siren, the Auto Center Garage, and the Third Church of Christ Science Reading Room. However, as discussed in the Historical Report, setting is not an essential factor of integrity for any of these historical resources. The five historical resources would convey their significance as long as they retained the other factors of integrity, including location, design, materials, workmanship, feeling, and association. In the increasingly dense urban setting of Downtown, the construction of new buildings or other improvements across the street from historic buildings is not uncommon. Furthermore, the broader surroundings of these historical resources were already disrupted by the construction of The Bloc in 1973. The proposed 53-story tower, which would extend 41-stories above the expanded 12-story

podium, would simply introduce a third element above the base of the existing podium building. Additionally, the Project's proposed signage on the new tower and the existing podium, hotel, and office building would be integrated into the design of the Project. Overall, the five historical resources would not be materially impaired by the Project because they would remain listed or eligible for listing in the National or California Register and designated or eligible for designation as HCMs, as relevant. Therefore, as concluded in the Historical Report, the Project would not have indirect impacts to the historical resources listed and discussed above.

(ii) 7th Street Commercial Historic District

As detailed in the Historical Report, the Project would not have an indirect impact on the Historic District. The Bloc is a non-contributing property within the boundary of the Historic District. The proposed tower would be situated south of the existing hotel and office building, which are already in the viewshed of the Historic District as are the many skyscrapers in the Financial District. Similarly, modern signage is already present on the Project Site. Visibility of a new building, structure, or feature, such as new or different signage (such as that proposed in the Project's Sign Supplemental Use District from certain vantage points within the Historic District alone would not result in an impact. The Historic District would not be materially impaired by the Project because it would remain eligible for listing in the National and California Registers and eligible for designation as an HPOZ. Therefore, the Project would have no indirect impact on this historical resource.

Based on the above, and as discussed in more detail in the Historical Resource Report, the Project would not directly or indirectly cause a change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Therefore, impacts to historical resources would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. As provided in the records search conducted for the Project Site by the SCCIC (included in Appendix A of this Draft EIR), there are no known archaeological resources within the Project Site. In addition, while segments of the zanja network, specifically Zanja Nos. 8 and 8-R, have been mapped in the vicinity of the Project Site, no documentation has been found depicting these zanja segments within the Project Site.³³ The Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavations would extend approximately 10 feet below the existing parking garage level. Additionally, the Project would include the installation of drilled cast-in-place concrete pile foundations to support the proposed structure, which may extend to a depth of up to 100 feet. Thus, the Project would have the potential to disturb previously undiscovered archaeological resources. The City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Overall, with adherence to the City's condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. **Therefore, as concluded in the Initial Study, impacts with respect to Threshold (b) would be less than significant.**

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project Site is located within an urbanized area and has been subject to previous grading and development. The Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically,

³³ Refer to Appendix IS-3 for a Map prepared by Cogstone that depicts unconfirmed segments of the Zanja network within the greater Project vicinity.

excavations would extend approximately 10 feet below the existing parking garage level. Additionally, the Project would include the installation of drilled cast-in-place concrete pile foundations to support the proposed structure, which may extend to a depth of 100 feet. As such, construction activities would have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, and the County coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which require that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. **As such, as concluded in the Initial Study, impacts with respect to Threshold (c) would be less than significant.**

e. Cumulative Impacts

As indicated in Section III, Environmental Setting, of this Draft EIR, there are a total of 44 related projects in the vicinity of the Project Site. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in close proximity to the Project Site. Collectively, the related projects near the Project Site involve a mix of residential uses, retail, hotel, and office uses, consistent with existing uses in the vicinity of the Project Site.

(1) Impact Analysis

Although impacts to historic resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project.

As noted above, several other developments are proposed in the vicinity of the Project Site. The related projects located within the historical resources analysis Study Area include the following:

- **Related Project No. 1** involves the construction of a 42-story residential tower, comprised of 436 residential units; 3,750 square feet of restaurant uses, and 3,750 square feet of retail uses located at 744 South Figueroa Street, approximately 520 feet northwest of the Project Site.³⁴
- **Related Project No. 3** involves the construction of a 50-story mixed-use development comprised of 409 residential units and 7,329 square feet of retail uses located at 754 South Hope Street, immediately adjacent to the Project Site across Hope Street.³⁵

With regard to Related Project No. 1, as discussed in the EIR for this related project, the related project site does not contain any historical resources, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the project.³⁶ Immediately north of the related project site is the Barker Brothers Building, which is a designated City HCM. As determined in the EIR, the related project would not result in a substantial adverse change to the Barker Brothers Building, and it would continue to be eligible for listing as a historical resource defined by CEQA. Thus, impacts with respect to historical resources were determined to be less than significant in the EIR for Related Project No. 1.

With regard to Related Project No. 3, as discussed in the Initial Study prepared for Related Project No. 3, the related project site does not contain any historic resources, and no HCMs are located adjacent to the related project site. However, in the northern portion of the block containing the related project site, fronting along 7th Street, is the Boston Store—J.W. Robinson’s Building, which is a designated City HCM (HCM #357).³⁷ However, this building is located approximately 250 feet north of the related project site and is physically separated from the related project site by a 5-level parking structure along Grand Avenue and an 8-story parking structure and a small church (Christian Science Church—Third Church of Christ, Scientist) along Hope Street. Therefore, as discussed in its Initial Study, Related Project No. 3 would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and potential impacts to historical resources were determined to be less than significant.

³⁴ City of Los Angeles, Department of City Planning, Draft EIR, <https://planning.lacity.org/development-services/eir/fig-8th-project-0>, accessed March 16, 2023.

³⁵ City of Los Angeles, Department of City Planning, Initial Study, 8th, Grand, and Hope Project, May 2019.

³⁶ City of Los Angeles, Department of City Planning, Draft EIR, <https://planning.lacity.org/development-services/eir/fig-8th-project-0>, accessed March 16, 2023.

³⁷ City of Los Angeles Department of City Planning, Historic-Cultural Monument (HCM) List, City Declared Monuments, April 3, 2018, p. 15.

Further, as described in the Historical Report, Related Project No. 1 and Related Project No. 3 would continue an established pattern of development in the Financial District, and there would be no cumulative impacts to the setting of historical resources in the immediate vicinity as a result of this development pattern from construction of Related Project No. 1 or Related Project No. 3. Therefore, there would be no potential for cumulative impacts to historical resources in the immediate vicinity from development of Related Project No. 1 and Related Project No. 3.

With regard to the Historic District, neither the Project nor the related projects would contribute to changes within the Historic District because the Project Site itself is a non-contributing property within the boundary of the Historic District, and none of the related projects are located within the Historic District. The Project would not contribute to the erosion of a class of historical resources because no historical resources would be demolished, destroyed, relocated, or altered as a result of the Project.

While there are a number of related projects in the Project Site vicinity, the Project would not result in a cumulative impact to historical resources. As discussed above, the Project has not been shown to have either a direct or an indirect impact on historical resources. The Project, in combination with other related projects, would not cause material impairment to any contributing resources or to identified character-defining features of the identified historic district, such as interior circulation pattern, predominantly industrial use, and the absence of sidewalks, street lighting, and street trees. **Therefore, Project impacts to historical resources would not be cumulatively considerable, and the Project and related projects would result in less-than-significant cumulative impacts to historical resources.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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