

IV. Environmental Impact Analysis

B. Cultural Resources (Historical Resources)

1. Introduction

This section evaluates potential impacts to 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 on information provided in the *Cultural Resources Technical Report* (Cultural Resources Report) prepared by Jenna Snow (June 2024), included in 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 and included in Appendix A of this Draft EIR and were determined to have a less-than-significant impact. A summary of the findings of the Initial Study is provided below.

2. Environmental Setting

a. Regulatory Framework

Historical 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 historical 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;

¹ Jenna Snow, *East End Studios at 6th and Alameda, Cultural Resources Technical Report*, June 2024.

- California Environmental Quality Act;
- California Register of Historical Resources;
- City of Los Angeles General Plan;
- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171);
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3); and
- 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

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

² 36 Code of Federal Regulations (CFR) 60.

³ U.S. Department of the Interior, National Park Service, National Historic Landmarks, Frequently Asked Questions, www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm, accessed June 20, 2024.

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

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

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁵

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

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

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

(i) Criteria

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

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;

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

- 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 historical 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 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.

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

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

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

(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
- 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.

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

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

(b) Secretary of the Interior's Standards

The National Park Service issued the Secretary of the Interior's Standards for the Treatment of Historic Properties (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 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 Standards for Rehabilitation provide 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 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.

(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 PRC 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 (California Register); (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency,

¹¹ U.S. 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.

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.

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"¹² According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

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

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.¹³

(b) California Register of Historical Resources

The 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

¹² State CEQA Guidelines Section 15064.5(b)(1).

¹³ State CEQA Guidelines Section 15064.5(b)(3).

the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁴ 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.¹⁵ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

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

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

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

¹⁴ *California Public Resources Code Section 5024.1[a]*.

¹⁵ *California Public Resources Code, Section 5024.1[b]*.

- Those California Points of Historical Interest that have been evaluated by the 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.

(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.¹⁶

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); and
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ).

¹⁶ *City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.*

(ii) Central City North 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 Project Site is located within the Central City North Community Plan area. The Central City North Community Plan includes the following objectives and policies related to cultural resources:

- Objective 17-1: To ensure that the community's historically significant resources are protected, preserved, and /or enhanced.
- Policies 17-1.1: Encourage the preservation, maintenance, enhancement, and reuse of existing buildings and the restoration of original facades.
- Objective 17-2: To encourage private owners of historic properties/resources to conserve the integrity of such resources.
- Policies 17-2.1: Assist private owners of historical resources to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.
- Objective 18-1: To enhance and capitalize on the contribution of existing cultural and historical resources in the community.
- Policy 18-1.1: Support the existing artists community in Central City North as a cultural resource for the community.

The City of Los Angeles Department of City Planning updated the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to create and implement a future vision for Downtown Los Angeles. On May 3, 2023, the Los Angeles City Council voted unanimously to approve the DTLA 2040 Plan. Following City Council approval, the implementing ordinances are now being reviewed and finalized by the City Attorney for

form and legality. After the City Attorney has completed their review for form and legality, the DTLA 2040 Plan will be presented to PLUM and City Council for adoption.

The DTLA 2040 Plan proposes goals related to cultural resources including, but not limited to, the following:

- LU 13.1: Protect and support the rehabilitation of historic resources designated at the local, state, or national level.
- LU 13.3: Prevent the unnecessary loss of resources of historic significance, special character, cultural, or social significance.
- LU 13.4: Support existing and future policy that is intended to enhance, restore and activate resources eligible for listing on local, state, or national registers, including through the use of Survey LA, the Los Angeles Historic Resources Survey, and other City recognized surveys.
- LU 14.3: Support existing and future efforts that are intended to enhance, restore, and activate historic resources.
- LU 15.1: Ensure that where new development occurs, it complements the physical qualities and distinct features of existing historic resources.
- LU 15.2: Retain the integrity of historic resources while achieving a balance between preservation and the need to accommodate housing and jobs in Downtown.

(b) City of Los Angeles Cultural Heritage Ordinance

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

- 1) The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified; or

- 2) The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
- 3) 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.¹⁷

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 and California Registers 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, 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

¹⁷ *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”¹⁸

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

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zone (HPOZs) in 1979; 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.¹⁹ 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.²⁰ 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)

The City of Los Angeles Historic Resources Survey (SurveyLA) is a citywide survey that identifies and documents potentially significant historical resources representing important themes in the City’s history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department

¹⁸ *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

¹⁹ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

²⁰ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

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

The 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 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 Register are separate processes that include property owner notification and public hearings.

b. Historical Background of the Project Site

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

(1) Existing Conditions

(a) Existing Project Site Conditions

The Project Site is currently developed with two single-story warehouse structures, consisting of approximately 311,000 square feet of floor area. The existing buildings are currently used for storage and distribution purposes. The Project Site also includes surface parking areas for automobiles and tractor trailer trucks.

(i) Exterior

The two buildings on the Project Site are almost mirror images of each other with only minor differences. They have no discernable architectural style and no ornamentation. The buildings have a rectangular plan and are one story with an interior mezzanine. They are constructed of reinforced concrete with a very low-pitched hipped roof.

With regard to the north building, circular rotary vents are evident along the ridgeline of the roof. Multi-light, metal, awning windows are arranged in pairs along the mezzanine floor of east and west elevations. Truck loading docks with metal roll-up doors are regularly spaced along the north elevation. Warehouse floors are about four feet above exterior grade, at the height of the adjacent dock. Entrances to individual warehouses are reached via short flights of contemporary, metal steps along this elevation, which are interspersed among truck loading docks. The east elevation has a projecting deck covered by a corrugated metal shed roof supported by thin metal piers. A continuous platform, covered by a corrugated metal canopy, runs almost the full length of the south elevation. Irregularly spaced, wide openings face the platforms. The platform ramps down to the ground level at both ends.

The south building has no fenestration, and the east and west elevations have no articulation. Truck loading docks with metal roll-up doors are regularly spaced along the south elevation. Warehouse floors are about four feet above exterior grade, at the height of the adjacent dock. Entrances to individual warehouses are reached via short flights of contemporary, metal steps along this elevation, which are interspersed among truck loading docks. The western portion of the south elevation is set back a few from the adjacent loading docks, creating a shallow "L." A continuous platform, covered by a corrugated metal canopy, runs almost the full length of the north elevation.

(ii) Interior

The interiors of both buildings consist of large volume warehouse spaces with unfinished concrete exterior walls and floors. Ceilings have visible glulam beams,²¹ while a line of regularly spaced metal columns steps down the center of the buildings. Partitions between warehouse spaces consist of drywall covered by unfinished plywood. Contemporary offices and interior partitions are constructed within the high-volume space using a variety of materials. Large, contemporary, metal refrigerators are also constructed within the high-volume spaces.

(iii) Alterations

The north building was completed in 1963 as two separate buildings. The two buildings were separated by 65 feet. The two portions of the north building appear in a historic aerial photograph from 1965 and a historic Sanborn Fire Insurance Map from 1967. The eastern portion of the south building was constructed in 1968. This portion of the south building is evident in a historic Sanborn Fire Insurance Map from 1970. Drawings dated March 23, 1973 show a proposed western addition to the south building and also indicate the two portions of the north building were joined on this date. Elevations of both buildings were also unified with regularly spaced openings and continuous canopies.

(b) Historic Context

The Project Site is surrounded on three sides by an area identified in SurveyLA as a potential historic district, which is the Downtown Los Angeles Industrial Historic District. While the Project Site is not included within the boundaries of the potential historic district, it is appropriate to consider them within the same historic context. The following historic context is excerpted from the statement of the identified historic district included in “SurveyLA Citywide Historic Context statement; Industrial Development, 1850–1980”:

The Downtown Los Angeles Industrial Historic District is significant for its role in the industrial history and development of Los Angeles. The district as a whole served as the city’s primary industrial district from the late-19th century through World War II. The district’s period of significance is 1900 to 1940, when most of the original buildings in the district were constructed. Contributors not only represent important industries and industrial building typologies, but also reflect significant examples of architectural styles of the day applied to industrial buildings and were often the work of noted architects and designers. Buildings in the district are also associated with the

²¹ *Glulam is glued laminated timber constituted by layers of dimensional lumber bounded together with durable, moisture-resistant structural adhesives so that all of the grain runs parallel to the longitudinal axis.*

ethnic/cultural and labor histories of the area. Some contributors within the district have also been evaluated for individual significance.

By the 1960s, however, the character of the area within the district was evolving away from that of an industrial center. Industry on the whole struggled to adapt to the postwar challenges of containerization and new technologies in manufacturing and transport. Railroads had given way to the trucking industry, and businesses within the district were constrained by the physical demands such methods placed on their operations. Furthermore, outlying fledgling industrial centers such as Vernon and the City of Commerce were comparatively undeveloped and offered plentiful land at lower prices, presenting many companies with an opportunity to relocate and construct newer and more efficient facilities. As a result, by the 1970s many buildings within the district were vacant. However, the area found new life as artists and other creative types began to congregate amidst the vacant buildings and empty lots. Priced out of established artists' colonies in neighborhoods such as Venice and Hollywood, Los Angeles' industrial district provided many with an opportunity to live and work inexpensively in the vast and vacant warehouse buildings. Soon, the area was home to a number of avant-garde art galleries, giving rise to the group of early artists now called the "Young Turks." Many of the area's most prominent industrial buildings found new life as gallery space and underground hangouts for a burgeoning art scene as well as the punk-rock music scene. In 1981, the City of Los Angeles implemented the Artist-in-Residence Program, which legalized the residential use of formerly industrial buildings for artists, legitimizing their efforts. In the mid-1990s, the area was officially designated as the Arts District. A subsequent wave of development began in 1999 with the passing of the Adaptive Reuse Ordinance which relaxed zoning codes and allowed for the conversion of pre-1974 commercial and industrial buildings into residences for artists and non-artists alike. Today, the area continues to attract new commercial and residential development, and existing facilities are adapted to meet the needs of the growing community.

(c) Project Site History

Originally owned by Los Angeles Union Terminal, Inc., the buildings on the Project Site replaced a continuous series of one-story, small produce stalls that were located immediately adjacent to East 6th Street. A rail spur ran along the south side of the buildings along Produce Street, which is a private street. Another series of one-story stalls ran along the center of the buildings, while a larger warehouse, owned by Los Angeles Public Market Company, was located along the south side of the buildings. A second rail spur ran along Warehouse Street. L.A. Union Terminal had a small produce warehouse at the southwestern corner of the Project Site.

L.A. Union Terminal, Inc. and Los Angeles Public Market Company were “wholly owned facilities of the Southern Pacific Co.” Drawings prepared in 1973 indicate the buildings on the Project Site were a “warehouse extension for Los Angeles Union Terminal, Inc.” Southern Pacific Company, later known as Southern Pacific Transportation Company, started in the mid-19th century and became a vertically integrated monopoly in California and throughout the country.

As indicated by a historic Sanborn Fire Insurance Map from 1967, the north building was constructed as a “general merchandise warehouse,” while the south building was constructed as a “building material warehouse.” The two buildings were occupied primarily by produce warehouses. However, tenants, such as Montgomery Ward Co., Morton Salt Co., and Major Casket Co. used the warehouse space for other types of goods.

(2) Historic Resources

(a) Project Site

As detailed in the Cultural Resources Report and summarized further below, the existing buildings on the Project Site are not eligible for listing in the National or California Register or for local designation. Therefore, there are no historical resources within the Project Site.

(b) Project Site Vicinity

As discussed in the Cultural Resources Report, a study area, which comprises the Project Site and the parcels immediately across 6th Street and Mill Street and immediately adjacent to the south, was established to evaluate the potential impacts of the Project on identified historic properties in the vicinity of the Project Site. As shown in Figure IV.B-1 on page IV.B-20, in addition to the Project Site, a portion of the boundary of the potential Downtown Los Angeles Industrial Historic District (DTLA Historic District), as well as several contributing properties to the potential DTLA Historic District, are located within the study area.

(i) Downtown Los Angeles Historic District

The potential DTLA Historic District was identified in SurveyLA as appearing eligible for listing in the National Register, California Register, and locally as a City of Los Angeles HPOZ. The potential DTLA Historic District is an industrial area situated between the Alameda Street corridor and the Los Angeles River, just east of downtown Los Angeles. Development in the potential DTLA Historic District is almost exclusively industrial in nature, with only a handful of commercial and institutional uses, yet the properties vary widely in size, from modest industrial buildings to massive warehouses spanning full city blocks.



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

Original buildings were constructed primarily from 1900 to 1940 and are predominantly vernacular or utilitarian in design.

(ii) Contributing Properties

Of the 21 properties within the study area, 10 were identified as contributing resources to the potential DTLA Historic District. The following provides a brief developmental history of each contributing property in the study area based on the Cultural Resources Report.

Property B—1205 East 6th Street (1912)

In 1911, a permit was issued to owner Phillip L. Wilson for construction of a three-story, 54-room brick rooming house at 1205 East 6th Street. Historic Sanborn maps show that, in 1950, it was used as a hotel and as a Chinaware warehouse and hotel between the years 1959 through 1970. The building currently functions as a low income and homeless housing.

Property E—1235 East 6th Street (1901)

Despite the Los Angeles County Assessor's date of construction in 1901, there are no permits available for this property prior to 1910. In 1910, a permit was issued to owner Mrs. Pearl Vollmer Mines for construction of a one-story, one-room brick warehouse at 1235 East 6th Street. Historic Sanborn maps show that, in 1950, the building was used for fish curing, as a smoked fish warehouse in 1959, and a metal warehouse in 1960. Historic Sanborn maps from the years 1967 and 1970 show that it was simply labeled as a warehouse.

Property H—1269 East 6th Street (1906)

There is no original permit available documenting construction of this property. The earliest available building permit is an alteration permit from 1935, issued to owner A. Pellagrina to add a mezzanine floor for the purpose of storing empty cases and wine bottles. The building was used by the California Wine and Brandy Company at the time. Historic Sanborn maps show the building was used for wines and bottling through at least 1953 and for old cloth sorting between the years 1954 through at least 1970.

Property J—1275 East 6th Street (1911)

In 1910, a permit was issued to owners E.M. Weyl and M. Zuckerman for construction of a two-story brick wholesale produce building at 1275-1277 East 6th Street. The building was designed by the architectural partnership of Edelman and Barnett. Historic Sanborn maps show that the building was used for furniture manufacturing from at least 1950 until at least 1970.

Property K—1281 East 6th Street (1922)

In 1922, a building permit was issued to the owner Pacific Provision Company to construct a one-story plus basement brick cold storage warehouse at 1281 East 6th Street. The building was designed by the owner and constructed by contractor Lynch Cannon Engineering Company. Later the same year, a permit was issued to the same owner to add a cooling tower to the roof of the existing building. Historic Sanborn maps show that, in 1950, the building was used as a food warehouse, as a fresh dairy products warehouse in 1953, and as a smoked fish warehouse by 1959 through at least 1970.

Property L—1291 East 6th Street (1293)

In 1922, a building permit was issued to owner Mc. Cunniff Brothers for construction of a two-story, brick, three-room warehouse at 1291 East 6th Street. Historic Sanborn maps show that the building was used as a “stationary warehouse” in 1950, as a rag warehouse in 1959, and for office uses and parking in 1967.

Property N—1309 East 6th Street (1923)

Historic Sanborn maps show that this property historically comprised the addresses 1309-1331 East 6th Street. In 1922, a permit was issued to owner Los Angeles Gas and Electric Corporation for construction of a one-story, three-room garage building of brick. Historic Sanborn maps show that the property was occupied by Gas Appliances, Inc., in 1950, by Affiliated Metal Products and sheet metal storage in 1959, and by Universal Titanium Company, Inc. in 1976.

Properties Q and R—1340 East 6th Street (1924, 1945)

In 1924, a permit was issued to owner Western Improvement Company for construction of a six-story reinforced concrete warehouse building built to the parcel boundaries at 1340 East 6th Street.

In 1945, a permit was issued to owner Metropolitan Warehouse Company for the addition of a new 5,300-square-foot building. Historic Sanborn maps show that, from 1950 through 1970, the building was identified as the Metropolitan warehouse, used as a general storage warehouse. The 1945 addition is referred to as the “annex” on these maps.

Property U—1567 Industrial Street (circa 1900–1915, 1914, 1971)

This property includes a long rectangular parcel encompassing the addresses 1555–1719 Industrial Street and comprising five buildings with multiple dates of construction. While there are no building permits documenting construction of the earliest buildings at the property, the 1906 Sanborn map shows the property developed with two of the existing

buildings located in its eastern half and were used for cement storage at the time. In 1914, a permit was issued for construction of an additional one-story storage warehouse at 1575 Industrial Street. In 1917, a permit was issued to the owner California Sanitary Canning Company for the erection of a loading platform at 1583-1593 Industrial Street. Historic Sanborn maps show that, by 1950, the buildings at the property were used for industrial operations, including building materials and cement storage, a paper products warehouse, bottle closure warehouses, bottle stopper manufacturing, and for a private garage and auto repair facility. From 1960 through 1970, the uses remained industrial and had changed slightly to include metal furniture assembly and warehouse space. In 1971, an addition was made to the property incorporating new construction at its western end. A Certificate of Occupancy was issued to owner American Bonded Fiber for a one-story addition to the existing light manufacturing and warehouse building at 1601 Industrial Street. This 1971 building is considered non-contributing.

c. Evaluation of Eligibility for Buildings on the Project Site

As discussed in the Cultural Resources Report, because eligibility criteria for local HCM designation align in large degree with eligibility criteria for National and California Registers, the following evaluation considers eligibility under each of the criteria at federal, State, and local levels under a single criteria:

Criterion A/1/1:^{22,23} Is associated with events that have made a significant contribution to the broad patterns of the nation's, State's, or City's history and cultural heritage.

The two buildings on the Project Site were developed in 1963 and 1968, primarily as general merchandise warehouses. As with earlier warehouses, the buildings were rented by a variety of tenants storing materials ranging from salt to caskets. As noted above, by the 1960s, the character of the surrounding area was evolving away from that as an industrial center. The period of significance for the identified potential DTLA Historic District begins in the 1900s and ends in 1940. The Project Site clearly responded to a need for general warehouse and cold storage space even though the industrial character of the area was in decline when they were constructed. The warehouses located on the Project Site have not made any contribution to the broad range of the nation's, State's, or City's history or cultural heritage. In addition, due to the significant alterations of the buildings in 1973, specifically combining the two buildings into one and constructing a major addition onto the south building, losses of integrity prevent the warehouses from conveying any meaning they may

²² *National Register Criterion/California Register Criterion/Local (HCM) Criterion.*

²³ *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.*

have once had. Therefore, the buildings on the Project Site are not eligible under Criterion A/1/1.

Criterion B/2/2:²⁴ Is associated with the lives of persons important in the nation's, State's, or City's past.

Owned by a large conglomerate, few, if any, specific individuals can be associated with the Project Site, and none rise to the level required to warrant consideration under Criterion B/2/2. There was a high turnover of tenants, and it can be assumed that, as warehouse spaces, the buildings at the Project Site are not the location of important work for any of the individuals connected with the tenants. Therefore, the buildings at the Project Site are eligible under Criterion B/2/2.

Criterion C/3/3: 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.

The buildings on the Project Site have no discernible architectural style and no ornamentation. As utilitarian warehouses, the buildings on the Project Site are not distinctive of a type, period, region, or method of construction. In addition, as a collaboration between several different draftsmen, the buildings are not significant for an association with an important creative individual or group of individuals. No information on specific draftsmen responsible for the buildings is available. Furthermore, because of alterations in the 1970s, the buildings no longer retain integrity. Therefore, the buildings on the Project Site are not eligible under Criterion 3/C/C.

Criterion D/4/4: Has yielded, or may be likely to yield, information important in prehistory or history.

The buildings on the Project Site cannot be reasonably expected to yield information important in prehistory or history; therefore, they are not eligible under Criterion D/4.

(1) Integrity

In addition to meeting one of the four criteria, National and California Register-eligible properties must also retain sufficient integrity to convey historic significance from their period of significance. A property either retains its integrity, the physical and visual characteristics necessary to convey its significance, or does not. Evaluation of integrity is founded on “an understanding of a property’s physical features and how they relate to its significance.” The

²⁴ *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.*

seven aspects of integrity are Location, Design, Setting, Materials, Workmanship, Feeling, and Association. As discussed in the Cultural Resources Report, the two buildings on the Project Site have been significantly altered and do not retain integrity of design, materials, workmanship, or feeling.

- *Location:* The buildings on the Project Site retain their integrity of location as they have not been moved or moved to the Project Site.
- *Design:* Integrity of design of the buildings on the Project Site has been compromised. Originally two buildings, they were later combined into one building in 1973. The same year, the western portion of the south building was constructed.
- *Setting:* The Project Site retains integrity of setting, which is defined in part as relationships between buildings and other features, or open space.
- *Materials:* Integrity of materials of the buildings on the Project Site was compromised by alterations to the design, as well as by construction of individual warehouse entrances.
- *Workmanship:* Due to losses of integrity of design and materials, the buildings on the Project Site do not retain integrity of workmanship or evidence of artisans' labor and skill in constructing or altering a building.
- *Feeling:* Integrity of feeling is defined as a property's expression of the aesthetic or historic sense of a particular period of time, resulting from the presence of physical features that, when taken together, convey the property's historic character. The buildings on the Project Site lack integrity of feeling as the original character is no longer present.
- *Association:* Integrity of association requires the presence of physical features that would convey the historic character of a property. As the buildings on the Project Site were constructed primarily as produce warehouses and they continue to function in that capacity, they retain integrity of association.

(2) Historic District Eligibility

The Project Site is surrounded by the potential Downtown Los Angeles Industrial Historic District. The buildings on the Project Site were likely excluded from the boundaries due to their construction over two decades after the end of the period of significance during a period of industrial decline in Los Angeles. Not only were the buildings constructed well outside of the period of significance, but they never represented an important industry or reflected an industrial building typology. The buildings on the Project Site are not eligible as contributing buildings to the potential historic district. Furthermore, there is no other potential historic district in the vicinity to which the Project Site could contribute.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Cause a substantial adverse change in the significance of 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 listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate impacts to historical resources:

- 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.²⁵ A substantial adverse change in the significance of an historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate

²⁵ CEQA Guidelines Section 15064.5(b).

surroundings such that the significance of an historical resource would be materially impaired.²⁶

b. Methodology

The Cultural Resources Report provided in Appendix C is based, in part, on a field inspection of the Project Site, Sanborn Maps, historic photographs, aerial photographs, newspaper articles, and various historic reports, and the SurveyLA Historic Context Statement. 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?

(1) Impact Analysis

(a) Direct Impacts

As discussed in the Cultural Resources Report, since the existing buildings on the Project Site are not eligible for listing in the National or California Register or for local designation, there is no potential for direct impacts to historical resources.

Construction activities associated with the Project do have the potential to directly impact Property U, located at 1567 Industrial Street, which is the only contributing property to the potential Downtown Los Angeles Historic District that is immediately adjacent to the Project Site. As evaluated in Section IV.G, Noise, of this Draft EIR, the estimated vibration levels from the construction equipment would be well below the 0.12-PPV building damage criterion for the existing historic buildings located on the north side of 6th Street and south of the Project Site. In addition, the Project would not directly alter any

²⁶ CEQA Guidelines Section 15064.5(b)(1).

structures on this adjacent property. **Therefore, potential direct impacts to historical resources as a result of the Project would be less than significant.**

(b) Indirect Impacts

In general, CEQA Guidelines Section 15064.5(b)(1) describes an indirect impact as one that results from the "...alteration of the resources or its immediate surroundings such that the significance of a historical resource would be materially impaired." As the Project Site is located immediately adjacent to the potential DTLA Historic District, the potential exists for indirect impacts to the setting of this potential DTLA Historic District as a result of the Project. As previously discussed, the potential DTLA Historic District is historically significant for its vernacular- and utilitarian-style industrial buildings constructed from 1900 to 1940. The setting of the potential DTLA Historic District consists of buildings that range in scale between low-, mid-, and high-rise construction, with some areas incorporating "in-between spaces," such as public or private alleys. While some of the existing buildings are modestly sized, encompassing only a single assessor parcel, others consume entire City blocks. The range of variation in building types reflects the multitude of unique industrial uses inhabiting the area over time.

As discussed in the Cultural Resources Report, the Project would be in conformance with Standard 9 set forth by the Secretary of Interiors Standards for Treatment of Historic Properties as it would not destroy any spatial relationships that characterize adjacent and nearby historical resources. As the Project would maintain a similar size, scale, proportion, and massing to the adjacent potential DTLA Historic District, it would conform with Secretary's Standard 9 and not destroy the potential DTLA Historic District's integrity of setting.

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 related 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 the Effects Found Not to be Significant subsection of 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 subjected to grading, excavation and fill activities, and development in the past. Based on a records search conducted by the South Central Coastal Information Center (SCCIC) for the Project Site, as referenced in the Archaeological and Ground Penetrating Radar (GPR) Investigation (see Appendix IS-2 of the Initial Study included in Appendix A of this Draft EIR), no archeological resources were identified within the Project Site. Additionally, as concluded in the Archaeological and GPR Investigation, GPR investigations did not result in any subsurface readings that would be consistent with the documented route or typical physical characteristics of zanja segments. Based on these results, and in consideration of the severity of past disturbance of subsurface soils that would have occurred during construction of the large buildings already occupying the majority of the Project Site, it appears unlikely that any extant zanja segments or other intact cultural resources are present that could be impacted as a result of Project implementation. Thus, the Project would not be anticipated to result in a substantial adverse change in the significance of an archaeological resource. Overall, with adherence to the City's condition of approval regarding the inadvertent discovery of archaeological resources and consistent with PRC 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. No further analysis is required.**

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 in an urbanized area and has been subjected to previous grading and development. In addition, the Project would require limited excavation associated with grading and installation of building foundations. No excavation for subterranean uses such as parking would occur. Nevertheless, existing regulations govern the inadvertent discovery of any human remains. In accordance with these existing regulatory requirements, 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 determines 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. No further analysis is required.**

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are a total of 21 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 variety of uses, including apartments, retail, restaurant, general office and medical office uses, and mixed-use developments incorporating some or all of these uses.

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 previously discussed, the Project has not been shown to have either a direct or an indirect impact on historical resources. In addition, the Project would not result in a cumulative impact to the potential Downtown Los Angeles Industrial Historic District. Specifically, the Project's potential impacts would not be cumulatively considerable as there are no identified historical resources within the Project Site that could result in cumulative direct impacts. Accordingly, the Project, in combination with other related projects, would not contribute to any cumulative impacts. **Therefore, the Project would result in less-than-significant cumulative impacts to historical resources, and the Project's impacts to historical resources would not be cumulatively considerable.**

(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.