

IV. Environmental Impact Analysis

C. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological 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 (National Register), as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section is based on information provided in the *Buena Vista Project Historical Resources Technical Report* (Historical Report) prepared by Historic Resources Group (HRG) in June 2025, included as Appendix C.1 of this Draft EIR, as well as the *Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project* (Cultural Resource Assessment), prepared by Statistical Research, Inc. (SRI) in June 2025, included as Appendix C.2 of this Draft EIR. The Project's potential impacts related to 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
- 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 North 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 [LAMC], Section 12.20.3)
- City of Los Angeles Historic Resources Survey

(1) Federal

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

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

¹ 36 Code of Federal Regulations (CFR) 60.

² U.S. Department of the Interior, National Park Service, *National Historic Landmarks, Frequently Asked Questions*, www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm, accessed December 30, 2024.

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

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 historic development, such as commercial versus residential or industrial.⁴

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

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

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

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

⁴ *U.S. 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 property 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 property 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 property:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.⁵

(ii) *Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its 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.”⁶ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(iii) *Integrity*

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance.”⁷ The National Register recognizes seven qualities that, in various combinations, define integrity.

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

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

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

The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.⁸ 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

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

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.

- 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 exceptional 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 for the Treatment of Historic Properties

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.¹¹ 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.

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.

4. Changes to a property that have acquired historic 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 will 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 will 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.¹²

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.

¹² *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.*

(c) *Native American Graves Protection and Repatriation Act*

The Native American Graves Protection and Repatriation Act 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.¹³

(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. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.¹⁴

(e) *Archaeological Data Preservation Act*

The Archaeological Data Preservation Act 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 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

¹³ *United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, 1990.*

¹⁴ *U.S. Department of the Interior, National Park Service, Technical Brief #20: Archeological Damage Assessment: Legal Basis and Methods, 2007.*

Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.¹⁵ 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.¹⁶

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

¹⁵ *California Public Resources Code Section 21083.1(a).*

¹⁶ *State CEQA Statute and Guidelines, Section 15064.5(c)(4).*

the significance of a historical resource would be materially impaired.”¹⁷ 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), 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.¹⁸

(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 the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁹ 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.²⁰ 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 Statute and Guidelines, Section 15064.5(b)(1).*

¹⁸ *State CEQA Statute and Guidelines, Section 15064.5(b)(3).*

¹⁹ *California Public Resources Code, Section 5024.1[a].*

²⁰ *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 in 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 OHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

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

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

(c) California Health and Safety Code

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

(d) California Public Resources Code

PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event that human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

(3) Local

(a) City of Los Angeles General Plan

(i) Conservation Element

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

protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.²¹

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).

(ii) Central City North Community Plan²²

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, which includes the following objectives and policies related to historical resources that are applicable to the Project:

- Goal 17: Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.
- Objective 17-1: To ensure that the Community's historically significant resources are protected, preserved, and/or enhanced.

²¹ City of Los Angeles, *Conservation Element of the General Plan*, pp. II-3 to II-5.

²² *The Downtown Los Angeles (DTLA) 2040 Plan is the result of a combined planning process that involves updates to the Central City North Community Plan and the Central City Community Plan, which together make up DTLA 2040, which became effective on January 27, 2025. Since the application for this Project was filed and deemed complete before DTLA 2040 became effective, the provisions of DTLA 2040 do not apply to this Project. As such, the Central City North Community Plan is still the operative land use document for the Project Site, and therefore, DTLA 2040 is not applicable to the Project.*

- Objective 17-2: To encourage private owners of historic properties/resources to conserve the integrity of such resources.
 - Policy 17-2.1: Assist private owners of historic resources to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.
- Goal 18. A community which promotes cultural amenities and implements the City’s Cultural Master Plan.
 - Objective 18-1. To enhance and capitalize on the contribution of existing cultural and historical resources in the community.

(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 Cultural Heritage 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 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; 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 a style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.²³

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:

²³ *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

- 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 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.”²⁴

²⁴ *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

(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 Zones (HPOZs) in 1979; this ordinance was amended in 2017. 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.²⁵ 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.²⁶ For CEQA purposes, contributing elements are treated as contributing features to a historic district, which is the historical resource. Non-contributing elements are any building, structure, landscaping, natural feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, non-contributing elements are not treated as contributing features to a historical resource.

(d) City of Los Angeles Historic Resources Survey

The City of Los Angeles Historic Resources Survey (SurveyLA) is a citywide survey that identifies and documents potentially eligible historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources, such as buildings, structures, objects, natural features and cultural landscapes, as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially eligible 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

²⁵ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

²⁶ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

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 historical resources. Designation by the City of Los Angeles and nominations to the California Register or National Register are separate processes that include property owner notification and public hearings.

b. Existing Conditions

(1) Overview of Project Site and Surrounding Area

The Project Site is generally bound by North Broadway on the north and west, and the Metro A Line right-of-way (ROW) and the Los Angeles State Historic Park on the south and east, with commercial land uses associated with the Mandarin Plaza center located adjacent to the southwest corner of the Project Site.

The area north of the Project Site consists of steep hillsides, including the southernmost portion of Elysian Park and Radio Hill. The Solano Canyon neighborhood is located to the north of the Project Site across North Broadway and generally contains one- and two- single-family residences, primarily dating from the late-19th and early-20th centuries. Development fronting North Broadway directly across from the Project Site includes single- and multi-family residential development from various periods, along with some institutional properties, including a high school, church and social hall, and a religious temple. Beyond the park, across North Spring Street, is an area developed with a mix of

uses dominated by one- and two-story industrial development, various commercial uses, and a post-World War II public housing complex.

Southwest of the Project Site is the community of Chinatown, which consists of primarily one- and two-story commercial buildings, mostly retail shops and restaurants, as well as a number of institutional properties. Some Chinatown buildings date to the establishment of New Chinatown in this area in the late 1930s. Immediately south of the Project Site is the Capitol Milling Company, a 19th-century flour mill complex, alongside a recent five-story residential complex at the corner of North Broadway and West College Street.

(2) Historical Resources

(a) Historical Background of the Project Site and Surrounding Area

The Historical Report included in Appendix C.1 of this Draft EIR includes a detailed description of the historical background of the Project Site and surrounding area. Below is a summary of the discussion included in the Historical Report.

(i) Spanish Colonial Period

The historical period in this portion of the Los Angeles Basin began with the 1769 Spanish expedition of Gaspar de Portolá and Father Juan Crespi, whose party traversed the coastal route that was to become El Camino Real between San Diego and Monterey Bay. The Portolá expedition passed very near to the current Project area on its way to the Los Angeles River, an event commemorated by a bronze plaque (California Historical Landmark No. 655) located at the northwestern corner of North Broadway and Elysian Park Row Drive, near the northern end of the Project Site. Mission San Gabriel del Arcángel—the fourth mission established in Alta California—was founded in 1771 approximately 7.8 miles east-northeast of where the Pueblo of Los Angeles was to be established. Charles III, King of Spain, authorized the founding of El Pueblo de Nuestra Señora de Los Angeles de Porciuncula in 1781. The original pueblo was small, originally consisting of fewer than 50 settlers, a detachment of soldiers, two priests, and an unspecified number of individuals drawn from the local village of Yaangna. The growth and development of the Pueblo of Los Angeles and its surrounding lands was largely due to the success brought by bringing water from the nearby Los Angeles River. That was accomplished by the excavation of a large open ditch known as the Zanja Madre (“Mother Ditch”), which would eventually be expanded into a complex network of irrigation ditches that served the growing pueblo, and later city, of Los Angeles. Work on the Zanja Madre began almost immediately upon establishment of the pueblo in 1781, and part of its original course ran along the base of a sloping hill below what is today North Broadway, within the current Project Site.

(ii) Mexican Period

Following Mexican independence in 1821 and secularization of the missions in 1834, settlement and agricultural development was encouraged on former mission lands outside the pueblo. The Pueblo of Los Angeles, which was initially granted a square league²⁷ for its operations, remained an important population center, and its lands were not confiscated by the Mexican government like the mission lands around it. The pueblo continued to grow, was granted the new title of “ciudad” in place of “pueblo,” and was designated the territorial capital of Alta California.

(iii) American Period

United States troops began occupying Alta California in 1846, at the beginning of the Mexican-American War, and it would officially come under American rule on February 2, 1848, with the signing of the Treaty of Guadalupe Hidalgo, which ceded the California territory to the United States and ended the war. In 1849, Los Angeles officials hired Lieutenant Edward Ord to survey Los Angeles’ public lands in order to offer them up for sale. In the Plan de la Ciudad de los Angeles, Ord’s first official city survey dated August 29th, 1849, the pueblo lands were formally mapped at 28 square miles, with the area in the vicinity of the Project Site and Los Angeles State Historic Park Site shown as agricultural in use. Los Angeles was incorporated as an American city on April 4th, 1850. Five months later, on September 9th, California was admitted to the Union as its 31st state.

The discovery of gold in northern California in 1848 had a significant effect on southern California as well, and specifically on Los Angeles. Much of the city’s growth during this period came from nearly 10,000 Sonoran miners who had come into California to work the gold fields but were later expelled due to anti-Mexican sentiment. As these migrants returned south, many chose to settle in Los Angeles, specifically along present-day North Main Street and North Broadway, in an area known as “Sonoratown.” It is also during this time that the zanja water system was expanded and a city position of Zanjero (ditch man) was created to oversee the system.

Los Angeles also drew economic benefits from the gold rush, particularly in the sale of cattle and wine to its northern neighbors. The brief prosperity of the cattle industry in Los Angeles was decimated by drought and floods and other environmental factors by 1865. Los Angeles’ wine makers, however, thrived during the 1850s and 1860s. Spanish colonial winemaking pioneers such as the Avilas helped to make wine Los Angeles’ chief product well into the 1870s, when over six million vines were planted in the Los Angeles area. However, it would be citrus that would provide the first agricultural “gold rush” for the Los Angeles region.

²⁷ A “league” is approximately 3 miles.

The pace of industrialization along the Los Angeles riverfront, which had started in the 1830s, quickened under U.S. control. The first industrial plant along the river was a three-story flour mill, constructed in 1831 by Abel Stearns, who was a wealthy merchant and ranchero that would eventually become America's richest citizen. He located his mill on open land near the southern end of what is now the Project Site and the Los Angeles State Historic Park, powering the plant with water from the Zanja Madre.

In 1858, Judge William G. Dryden established the Los Angeles Water Works, the region's first water company, and erected a massive wooden water wheel on the slope just east of present-day Broadway. The water wheel diverted water from the Zanja Madre onto the blufftop where pipes distributed it to a brick reservoir in the plaza. The water wheel was short-lived, however, having been destroyed by floods in the early 1860s. In 1868, the Los Angeles water system started using iron pipes. In 1870, the city water system had 50 miles of zanjas, and a population of 5,728.

(iv) Southern Pacific Railroad and the "River Station"

As early as the 1850s, federal railroad surveys had considered Los Angeles as a potential terminus or hub for a southern transcontinental railroad. In 1872, the Southern Pacific Railroad (SPRR) Company offered to build a rail connection in Los Angeles that would extend north to San Francisco and Sacramento, and east to Yuma, Arizona and beyond. The property selected for the new depot and yard was the land that now coincides with the middle portion of the Los Angeles State Historic Park. By 1873, SPRR had starting laying tracks from the new Los Angeles Junction, or "River Station" (the present-day Los Angeles State Historic Park) northbound toward San Francisco. Initially, River Station consisted of a depot, a small freight house, and several shop buildings.

By 1876, rail lines connected Los Angeles to the East Coast via the transcontinental railroad. The two-story Pacific Hotel was constructed adjacent to the depot in 1879 to service passengers. The River Station continued to expand after its initial opening, eventually consisting of a roundhouse with turntable, freight house, blacksmith shop, machine shop, transfer table, car shop, paint shop, coal dock, and other facilities. Also at this time, the Zanja Madre, running along the base of the slope at the northern edge of the rail yard property, was encased in brick and concrete. With the completion of the southern transcontinental route between Los Angeles and New Orleans in 1881, River Station would soon need to accommodate substantial increases in passenger and freight traffic. Over the next decade, SPRR would purchase what is now the northern portion of the Los Angeles State Historic Park, referred to on some maps as the "Bull Ring," and continue to expand its facilities.

The volume of passenger traffic at River Station continued to increase such that a new depot and hotel were constructed in 1883 to replace the original depot. For the next

decade, the River Station served as the main headquarters for SPRR operations, passenger service, and freight service. By this time, SPRR had become Los Angeles' largest employer, with more than 300 workers, many of whom occupied new residential neighborhoods surrounding the station property.

The intensive railroad activity had its effect on the development of the area surrounding River Station. Former agricultural lands near the station quickly became surrounded with railroad and other industrial activity. In 1883, Herman Levi and Jacob Loew purchased the Stearns flour mill and expanded it into a five-story structure with its own railroad siding, establishing the Capitol Milling Company. The Standard Oil Company of California built one of its first refinery facilities adjacent to the river and the rail yard after oil was discovered near downtown in 1892. Baker Iron Works, an influential industrial pioneer in Los Angeles, was established on Buena Vista Street (now North Broadway), just across the zanja from the rail yard. Various other foundries, manufacturers, and other shops were soon established in proximity to the rail yards, filling the area east of the station with a mixture of industrial plants and warehouses alongside the small bungalows and boarding houses for railroad workers.

In May 1887, SPRR announced plans to build a new passenger depot since River Station proved inadequate to handle all the volume of traffic generated by the rapid development of the area. In 1889, the ornate Arcade Depot on Alameda near 4th Street was opened and served as SPRR's main passenger terminal until 1915. The River Station Depot/Pacific Hotel continued operations until 1902 when it was removed from the original site and incorporated into a new, larger freight house at the south end of the property. With the Arcade Station handling the majority of passenger service, River Station was expanded to handle the massive volume of freight, mostly from Southern California's burgeoning citrus industry. By 1904, all shop activities had been moved from River Station to the newly completed "General Shops Yard" across the river in what is now Lincoln Heights. All of the original buildings dating to the time of SPRR's River Station facility had been demolished or dismantled. However, River Station remained very busy, continuing to serve as SPRR's main freight facility into the early-20th century.

By 1900, Los Angeles had doubled its population from the previous decade, and was now a city of over 100,000 residents. Starting with the Great Boom of the 1880s, thousands of new residents, most from the Midwest and Eastern United States, transformed the overall demographics of the City to that of an Anglo-American majority. However, in the older, more industrial areas of the City such as River Station and its surrounding neighborhoods (Sonoratown, Solano Canyon, El Pueblo, Old Chinatown, Lincoln Heights), the population became more ethnically diverse. Ethnic Mexican, Italian, German, Irish, and Chinese residents often provided the workforce for the railroads and other rapidly growing industries along the riverfront.

In 1908, the City zoned the area around River Station, east of North Broadway to the river's edge, as Industrial District No. 1, despite the fact that the area was still home to thousands of working-class residents. For the next two decades, River Station was the nerve center of SPRR's multimillion-dollar freighting operations in Los Angeles.

(v) The Decline of "River Station"

In 1925, SPRR transferred supervision of its freight operations from River Station to its newer, much larger facilities at Taylor Yard, approximately 2 miles north on the east side of the river. From this point onward, River Station served as an adjunct facility to Taylor Yard. Although reduced in status, River Station continued to be an important facility. In 1935, it became the key station for SPRR's daily "Overnight" Coast Merchandise Express freight trains to San Francisco and Portland.

The area around River Station saw dramatic changes during the 1930s and 1940s. In the early 1930s, the City began to discuss plans for a new passenger rail terminal. Ultimately, the site selected for the new rail facility was the "Old Chinatown" neighborhood, just east of the pueblo. Beginning in 1933, existing residents and businesses were forcibly removed to make way for the new Union Station. In response to the displacement of the occupants of Old Chinatown, businessman and community leader Peter Soo Hoo, Sr. joined with other Chinese business owners to create the Los Angeles Chinatown Project Association (later renamed the Los Angeles Chinatown Corporation) in 1937. The association gathered their own personal finances to purchase land and gradually, Chinese residents re-establish their homes and businesses just north of downtown and south of River Station, transforming the area then known as "Sonoratown" into "New Chinatown." The Union Station rail terminal, which replaced "Old Chinatown," opened on May 3, 1939.

SPRR continued its heavy utilization of the River Station facility for active freight operations during and after World War II. By the 1960s, River Station still served a few remaining industrial clients, although year by year more businesses and factories relocated their operations out of River Station to newer and larger industrial complexes away from the city center. By the 1970s, the railroad and industrial landscape that had dominated River Station and surrounding neighborhoods was deteriorating. In the face of this reality, on June 16, 1971 the Los Angeles Cultural Heritage Board declared the River Station area as HCM No. 82. On October 1, 1992, SPRR ceased all rail activities at the River Station facility, including the adjacent Bull Ring Yard at the northern part of the site. Soon, any remaining structures were dismantled and the property was closed.

(vi) Los Angeles State Historic Park

In the mid-1990s, support from numerous community organizations and a wide range of interest groups was coalescing around the idea of revitalizing the Los Angeles River.

Friends of the Los Angeles River (FoLAR), joined by scholars, design professionals, citizens, and politicians, focused efforts toward the closed rail yards at Taylor Yard and River Station to further river restoration plans and subsequent neighborhood revitalization. In 1984 and 1989, the Los Angeles City Planning Department identified the two former rail yards as opportunity sites for mixed-use (residential and commercial) development. In 1993, the City's Downtown Strategic Plan recommended as many as 12,000 dwelling units for the River Station property. The Los Angeles Unified School District considered the site for a new high school or operations facility, and private developers were eying the property for a possible sports arena.

In 1999, Majestic Realty proposed to redevelop the River Station site as a large warehouse and manufacturing complex using local, state and federal funding. In response to this proposal, a local coalition formed to oppose the Majestic project and stimulate support for the site's reuse as a public park. Legal challenges to the project were upheld in 2001, causing federal agencies to withdraw their subsidies, which effectively killed the Majestic project. That same year, the California Department of Parks and Recreation sponsored a study to determine the feasibility of adding the 32-acre parcel to the California State Park System and purchased the property using park bond funds.

In 2005, the California Parks and Recreation Commission renamed the property as "Los Angeles State Historic Park," identifying the new park's unique opportunity to complement existing regional state historic parks. On March 15, 2014, State Parks officially broke ground on the construction project to transform the former River Station site into a "world-class park." The project installed new paths, picnic areas, wetlands, an elevated pedestrian walkway, an amphitheater, infrastructure improvements, parking lots, restrooms, a ranger station, and a welcome center. Los Angeles State Historic Park opened to the public on April 22, 2017.

(b) Identification of Historical Resources

(i) Historical Resources on the Project Site

River Station

As discussed above and detailed in the Historic Report, on June 16, 1971, the Cultural Heritage Board of the City of Los Angeles designated the River Station Area/Southern Pacific Railroad as HCM No. 82. The designated boundary comprises the current sites of the Los Angeles State Historic Park, the Metro A Line right-of-way, and the Project Site, collectively.

At the time of designation, the River Station site was said to retain many vestiges of 19th-century railroading. Nevertheless, the Cultural Heritage Board agreed that recognition of the River Station Area would exclude any structures located therein. This fact was noted in 1998 when a City staff report recommended allowing the demolition of a 1958 car and auto

repair shop, stating that “the HCM declaration for this property specifically excluded any structures.” Moreover, a 1999 preliminary historic assessment noted that the River Station site lacks integrity due to the changes that have occurred since its 1971 HCM No. 82 designation, including the destruction of the SPRR Office and Freight House A by fire in 1978, and that the historic resource has, for all intents and purposes, been destroyed.

Thus, while the entirety of the River Station site (including the Project Site) is designated as an HCM, its significance appears to be as the site of important activities, and not for its association with any specific physical features. Nevertheless, the River Station, which includes the Project Site is considered a historical resource under CEQA.

Survey of On-Site Structures

All extant features currently evident on the Project Site were evaluated to determine if there are any additional historical resources present. The vast majority of these features were eliminated from consideration as potential historical resources due to age, lack of historic association, and/or as remnants of buildings or structures that are no longer extant, including the Golden Dragon Restaurant Rear Addition that would be demolished as part of the Project. One exception is the SPRR Auto Repair Garage, which was constructed in phases between 1953 and 1958, and is therefore over 50 years of age. It has a direct association with River Station, as it was built by the SPRR as an auto repair garage and wash rack. This building occupies its original site at what was the southern end of the River Station rail yard. Additionally, it appears to have good integrity from its period of construction, displaying a long rectangular plan, metal interior framing, corrugated roof and wall cladding, steel-sash industrial windows, a series of vehicular bays with metal doors along the east façade, and an open north façade. However, the SPRR Auto Repair Garage has been separated from the vast majority of the River Station site by the Metro A Line right-of-way and is unable to convey its historic association with River Station on its own. Additionally, the building is a utilitarian garage that was built during the later period of River Station and is not readily identifiable as a railroad type building. Thus, the SPRR Auto Repair Garage does not convey its historic significance and therefore is not eligible for listing as an individual resource. As such, the SPRR Auto Repair Garage is not considered a historical resource pursuant CEQA.

(ii) Historical Resources in the Project Vicinity

In addition to examining the Project Site, the Historical Report defines an area surrounding the Project Site where potential direct or indirect impacts could reasonably be expected to occur. This area is referred to as the Study Area and is shown in Figure IV.C-1 on page IV.C-25. As shown in Figure IV.C-1, the Study Area is defined as including all parcels immediately adjacent to the Project Site, including parcels along the west side of North Broadway, between Elysian Park Drive and Gin Ling Way; the Capitol Milling Company property, immediately south of the Project Site; and the former site of

Southern Pacific's River Station (i.e., the Los Angeles State Historic Park). As listed in Table IV.C-1 on page IV.C-27, the Study Area contains 15 previously identified historical resources for the purposes of CEQA, including two properties which are located within an identified historic district.

(3) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. The Cultural Resource Assessment prepared for the Project, included in Appendix C.2 of this Draft EIR, includes a detailed description of the cultural history of the Project Site and surrounding area. Below is a summary of the discussion included in the Cultural Resource Assessment.

(a) Prehistoric Overview

Evidence for continuous human occupation in southern California spans the last 10,000 years. The discussion below includes a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

(i) Paleoindian Period

Roughly 12,000 years ago, southern California was populated by several related yet distinct cultural groups, generally known as Paleoindians. The people of the Paleocoastal tradition inhabited coastal sites along stream channels and estuaries, marsh shorelines, and interior sites along ancient lakes. They are thought to have been the first to arrive in California and are believed to have migrated down the coast from northern California. People of the Paleocoastal tradition were adapted to maritime conditions and collected shellfish, hunted marine and land mammals and birds, and caught fish. The Paleoindians living farther inland are known as Clovis (from the original sites excavated near Clovis, New Mexico, in the early twentieth century) and were adapted to a terrestrial and lacustrine environment, using a very different subsistence technology from that of the Paleocoastal people. Major Clovis localities are known at Lake Tulare and China Lake, among other locations in central and southern California. Paleoindians had a sophisticated lithic (i.e., stonework) technology with advanced toolmaking techniques and were primarily, although not entirely, nomadic or systematically followed seasonal resources as those became available.

**Table IV.C-1
Previously Identified Off-Site Historical Resources**

Address	Name	Year Built	Previous Evaluation^{a,b}
1253 N. Bishops Road	Cathedral High School	1930, 1949, 1960	<ul style="list-style-type: none"> Listed in the HRI with status code 2S2 Designated HCM No. 281
957 N. Broadway	Bing Kong Tong Society of Los Angeles; Chinese Free Masons	1949	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 3S, 3CS, 5S3.
969 N. Broadway	Phoenix Bakery	1977	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 5S3
989 N. Broadway	Lung Kong Tin Yee Association	1949	<ul style="list-style-type: none"> Identified by SurveyLA with status code 3S, 3CS, 5S3
993 N. Broadway	Soo Yuen Fraternal Association	1949	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 3S, 3CS, 5S3
1001 N. Broadway		1951	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 3S, 3CS, 5S3
1031 N. Broadway		1890, 1926	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 3S, 3CS, 5S3
1041 N. Broadway	St. Peter's Italian Catholic Church (property includes "The Immigrants" Sculpture")	1946 (church), 1971 (sculpture)	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 3CS, 5S3 (church) and QQQ (sculpture)
1045 N. Broadway	Casa Italiana (property includes the "Replica of Lupa Capitolina Statue")	1972 (casa), 1930 (statue)	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 3CS, 5S3 (casa) and QQQ (statue)
1327 N. Broadway		1885	<ul style="list-style-type: none"> Identified by SurveyLA with status a code QQQ (stone retaining wall only)
1231 N. Spring Street	Capitol Milling Company, Stearns Mill, Eagle Mills	1883	<ul style="list-style-type: none"> Listed in the HRI with status code 2S2
1245 N. Spring Street	River Station (now Los Angeles State Historic Park)	1875 (rail yard), 2017 (Los Angeles State Historic Park)	<ul style="list-style-type: none"> Designated HCM No. 82
Boundaries defined as Bamboo Lane to the north, Lei Min Way to the south, Broadway to the east, and Hill Street to the West	East of Hill Street Chinatown District ^c		<ul style="list-style-type: none"> Determined eligible for the National Register by consensus in 1982^d Listed in the California Register
	Elysian Park (portion)	1886	<ul style="list-style-type: none"> Identified by SurveyLA with status codes 3S, 3CS, 5S3
	Buena Vista Street Viaduct (now called the North Broadway Bridge)	1909–1911	<ul style="list-style-type: none"> Listed in the HRI with status code 2S2

Table IV.C-1 (Continued)
Previously Identified Off-Site Historical Resources

Address	Name	Year Built	Previous Evaluation ^{a,b}
<p>^a Status code 2S2 indicates “Individual property determined eligible for the National Register by a consensus through Section 106 process; listed in the California Register.” SurveyLA status code 3S indicates a building, site, district, or object appears eligible for National Register as an individual property through SurveyLA or other survey evaluation. SurveyLA status code 3CS indicates a building, site, district, or object appears eligible for California Register as an individual property through SurveyLA or other survey evaluation. SurveyLA status code 5S3 indicates a building, site, district, or object appears to be individually eligible for local listing or designation through SurveyLA or other survey evaluation.</p> <p>^b In SurveyLA, status code QQQ is used to flag properties that research suggests may be historically significant, but the evaluation could not be completed within the parameters of SurveyLA methodology. The most common reasons an evaluation could not be completed under SurveyLA are (1) More research is needed to determine or confirm historic significance, or (2) The property is not visible from the public right-of-way and therefore integrity could not be assessed. The assignment of a QQQ to a property in SurveyLA is evidence of significance. Therefore, for the purpose of this environmental review, a property with a SurveyLA status code QQQ is considered a historical resource.</p> <p>^c A “Chinatown Commercial Historic District” was also identified by SurveyLA in 2016. It is included in the Chinatown District listed in the California Register in 1983.</p> <p>^d The Community Redevelopment Agency of the City of Los Angeles, “Determination of Eligibility: Chinatown,” prepared by Roger G. Hatheway and Associates, August 1982.</p> <p>Source: HRG, Buena Vista Project Historical Resources Technical Report, June, 2025. See Appendix C.1 of this Draft EIR.</p>			

(ii) Millingstone Period

The Millingstone period—sometimes referred to as the Early period—is a roughly 5,500-year span beginning in 6500 B.C. and ending with the first dramatic increase in regional human population in 1000 B.C. This period is a time when milling implements, scraper planes, choppers, and core tools were abundant and when there was a dearth of projectile points (in this case, dart points and spears) and faunal remains. Inherent in the definition of the Millingstone period is a heavy dependence on seeds and a minor emphasis on hunting. Near the end of the Millingstone period (1500 B.C.) through the early Intermediate period (ending ca. A.D. 500), there was an initial entry of Takic (a proto-Gabrielino/Cupan branch of the Uto-Aztecan language family) speakers into the region. These Takic groups appear to have replaced the existing late Millingstone period groups along the coast. Takic groups were biologically distinct from the preceding populations, suggesting that a migration took place. Flexed burial under cairns, a common burial practice throughout the Millingstone period, disappeared from the coast but continued inland; cremation was uncommon and was not a marker of the early Takic expansion.

(iii) Intermediate Period

The Intermediate period, dating from 1000 B.C. to A.D. 1000, is marked by changes in settlement patterns, economic activities, mortuary practices, and technology. Flexed burial

continued, and cremation remained uncommon; however large mourning features with cremated human bone appeared in about 600 B.C. during the early Intermediate period. The latter portion of the Intermediate period, A.D. 500–1000, is marked by the spread of the bow and arrow to the coast from the north and east. Sometime toward the end of the Intermediate period, the trade in obsidian mined from the Coso Formation decreased dramatically, and Obsidian Butte obsidian increased in importance. Yuman ceramics, plus some local wares, were present. Major settlements continued to be occupied on a seasonal basis.

(iv) Late Period

The Late period, beginning in A.D. 1000 and ending with European contact in A.D. 1542, witnessed extensive population growth along much of the southern California coast. There are more sites and a greater variety of sites with greater internal differentiation from this period than from any other time in prehistory. Villages with complex site layouts and burial grounds with highly variable mortuary treatments appeared.

(v) Protohistoric and Early Historical Period

The Protohistoric period in the Los Angeles Basin began with initial European contact in A.D. 1542 and ended with the establishment of Mission San Gabriel del Arcángel in 1771, after which direct and recurrent contact between the Gabrielino/Tongva and the Spanish settlers in the Los Angeles Basin was established. The early historical period (also known as the Mission period) runs from 1771 until the beginning of the era of secularization in 1834.

(b) The Gabrielino/Tongva

The Gabrielino/Tongva occupied much of present-day Orange and Los Angeles Counties as well as Santa Catalina, San Clemente, and San Nicolas Islands and portions of Riverside and San Bernardino Counties. Early ancestors of the Gabrielino/Tongva arrived in this area of southern California at the end of the Millingstone period, in 1500 B.C., through the early Intermediate period (ending in A.D. 500), with the initial entry of Takic-language speakers into the region.

The Gabrielino/Tongva engaged in an intensive hunter-gatherer lifestyle and exploited a wide range of plant and animal resources, such as acorns, deer, yucca, and cacti in the interior of their territory and a wealth of fish and shellfish species associated with the southern California kelp beds and coastline. With the arrival of Europeans and the expansion of the California mission system, however, pressure from Europeans to turn aside traditional lifeways to work at the various ranchos and missions became too great. By 1800, most of the Gabrielino/Tongva had become missionized, and many had died from violence, imported illness (e.g., smallpox), or illness associated with the cramped mission dormitories (e.g., tuberculosis and dysentery). Those who did not submit to the mission system fled the area

to live in remote refuges or work on secular ranches and farms. Many Gabrielino/Tongva still survive, but their numbers are far fewer today than they were at the point of contact.

There were two named Gabrielino/Tongva villages in the immediate vicinity of the Project Site. The most important of these was Yaangna (sometimes spelled Yanga or Yang-na), a large village in the area of present-day Union Station and City Hall, approximately 0.6 miles south-southwest of the Project area. The smaller village of Maungna was in the area of present-day Elysian Park, within the current Los Angeles Police Department Academy grounds, approximately 0.8 miles north-northwest of the Project area. Generally speaking, Gabrielino/Tongva settlements in the Protohistoric and early historical periods were near reliable rivers, streams, and springs. Both of the nearby villages were within 1 mile of the historical course of the Los Angeles River.

(c) Site Investigations and Findings

Fieldwork conducted for the Project involved an intensive systematic pedestrian survey of the Project Site to identify and record prehistoric or historical-period cultural resources. A total of 13 historical-period features were identified, recorded on the California Department of Parks and Recreation (DPR) forms, and evaluated as potential cultural resources, as listed in Table IV.C-2 on page IV.C-31 and identified in Figure 3 of the Cultural Resource Assessment. No prehistoric cultural resources were identified. As discussed in detail in the Cultural Resource Assessment included in Appendix C.2 and indicated in Table IV.C-2, of these potential cultural resources, the only resource that appears eligible for listing in the National Register or California Register is Site No. SRI-17, the Zanja Madre.

In addition to systematic pedestrian survey, ground penetrating radar (GPR) investigations were conducted for the purpose of identifying the extent and course of the Zanja Madre within the Project area. The findings of that investigation, which also involved mapping several segments of newly identified buried railroad tracks, are presented in Appendix B of the Cultural Resource Assessment. Following completion of an initial phase of GPR assessment, additional GPR work in (1) areas that were inaccessible during the initial effort, and (2) areas of particular interest with regard to the Zanja Madre was performed.

Additional archaeological test excavation was conducted in November 2023 to assess areas that had been previously inaccessible in an attempt to further delineate the path of the Zanja Madre with a focus on additional study of the Zanja Madre.

As indicated above, the only resource that appears eligible for listing in the National Register or California Register is Site No. SRI-17, the Zanja Madre. SRI-17a through SRI-17d are several sections of exposed brick features documented during the pedestrian survey by SRI. Features SRI-17a and SRI-17b were tested with GPR and were confirmed to be portions of the Zanja Madre. Two brick features, 17c and 17d, in the northern Project

**Table IV.C-2
Potential Cultural Resources Evaluated on the Project Site**

Site No.	Resource Description	Construction Year(s)	CEQA Historical Resource?
SRI-13	Buried Road Surface	Unknown	No
SRI-15	Pipeline (PD 16)	Unknown	No
SRI-17a-17b	Brick Features, Zanja Madre	ca. 1875	Yes
SRI-21	SPRR Automobile-Repair Garage	1953–1958	No
SRI-23	Golden Dragon Restaurant addition	1955 (Original Building 1946)	No
SRI-25	Foundation A	1949	No
SRI-36	Foundation C	Unknown	No
SRI-41	Footings	Possibly c. 1894	No
SRI-44	Foundation B	Pre-1950	No
SRI-46	Subterranean Tank	Unknown	No
SRI-59	Guardrail	Unknown (est. early 20th century)	No
SRI-61	Railroad Tracks	Historical Period, Age Unknown	No
SRI-65	Foundation Remnants	Unknown	No
<p><i>Source: SRI, Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project, June 2025. See Appendix C.2 of this Draft EIR.</i></p>			

parcel could not initially be tested using GPR because they were located on steep slopes, but are not portions of the Zanja Madre. Additional GPR surveys were successful at further delineating the possible pathway of the Zanja Madre. Certain ambiguous areas (including 17c and 17d) were eliminated as portions of the Zanja Madre, particularly in light of the test excavations. It now appears highly likely that no part of the Zanja Madre is present in the North Parcel.

The two GPR-confirmed sections of the Zanja Madre (SRI-17a and SRI-17b) are in the southern portion of the Project area and are partially exposed at the current ground surface. The exposed portions were constructed of two courses of red brick cemented with coarse mortar, and they form a hollow tube with an interior diameter of about 3 feet where intact (refer to Figures 6 and 7 of Appendix C.2). The southernmost, exposed section (SRI-17a), immediately north of SRI-65, is in poor condition and appears to represent a broken portion of the Zanja Madre that has been moved slightly from its original position, rotating parallel to the hillslope. The other section (SRI-17b) appears to be intact and in its original position. Its alignment is consistent with a previously documented section located approximately 820 feet to the northeast in an inaccessible area along the Metro A Line on Los Angeles County Metropolitan Transit Authority property, just outside the Project Site.

Both intact sections appear to represent the original course of the Zanja Madre, first constructed as an open ditch circa 1781 and then enclosed in brick between 1884 and 1888.

GPR documentation of SRI-17 confirmed its location and provided information about its condition and its likely buried course within the Project Site. Although a portion of the potential alignment could not be tested with GPR because of the steeply sloping hillside, areas that could be tested did indicate that the intact section continues northward along the hillslope and then appears to continue northeastward, likely crossing under a portion of the existing parking lot before continuing outside the Project Site along its historical course.

The Zanja Madre, multiple sections of which have been identified within and adjacent to the Project Site, is an important archaeological and historical resource that appears to have significance under CEQA. The Zanja Madre is a unique archaeological feature directly associated with the establishment of the Pueblo of Los Angeles, as well as its success and its subsequent development. The historic context of the Zanja Madre has been well established by previous studies. In 2008, Galvin Preservation Associates submitted an NRHP nomination to the California Office of Historic Preservation for a 75-foot segment of the Zanja Madre just outside the Project Site. The nomination identified the structure as eligible under NRHP Criterion A for association with events making a significant contribution to the broad patterns of history, with a period of significance of 1781–1904. In 2009, the nomination was declined by OHP with the comment that the nomination did not “discuss how this small segment of the extensive water conveyance system conveys the Zanja Madre’s significance for important associations with the development of Los Angeles.” The response stated further that “it is possible for a segment of a larger resource to meet eligibility requirements if it can be documented to be a rare surviving element of the larger system. In this case, the nomination must be a rare surviving element of the larger system. In addition, the nomination must establish the segment as the only or best surviving element of the system and demonstrate that the segment retains the essential physical features necessary to convey historic character of the resource.”

Since that time, additional sections of the Zanja Madre elsewhere in the City, such as the section discovered beneath the Blossom Plaza project at 900 N. Broadway, have been removed or demolished. The intact portions of the Zanja Madre within the Project Site are among the remaining sections that present an opportunity for preservation or creative mitigation. The Zanja Madre is a historical resource directly associated with the establishment of the Pueblo of Los Angeles, as well as its success and its subsequent development.

(d) *Background Research*

(i) *California Historical Resources Information System Review*

Three records searches were conducted by staff at the California Historical Resources Information System (CHRIS) was conducted by staff at the South Central Coastal Information Center (SCCIC) at California State University Fullerton for the Project Site and a surrounding 1-mile radius. The reviewed records included all investigation reports and resource records from the following sources: the National Register, the California Register, California Historical Landmarks, California Points of Historical Interest, the California OHP State Historic Resources Inventory, and the City of Los Angeles' HCM list. Records searches were conducted in September 2017, November 2019, and May 2022. Collectively, the records searches identified 78 cultural resource studies conducted within 1 mile of the Project Site (none of which were located on the Project Site) and 206 resources, three of which overlap or are adjacent to the Project Site, including: two separately recorded segments of the Zanja Madre (P-19-003103/CA-LAN-3103 and P-19-190309) and the River Station site (P-19-003120/CA-LAN-3120, HCM No. 82).

Resource P-19-003103/CA-LAN-3103 consists of two confirmed segments of the Zanja Madre. One segment that was identified is within the South Parcel, located between the off-site parking structure and the structures associated with Metro operations near the intersection of North Broadway and Cottage Home Street. The second segment identified is just south of the Project Site by the Capitol Milling Company building near College Street.

Resource P-19-190309, is another confirmed segment and is an approximately 7.8-foot-long segment of the Zanja Madre that abuts the Project Site to the southeast, within the Metro property and is currently protected with retaining walls.

Resource P-19-003120/CA-LAN-3120 is the Cornfield/River Station site and is designated HCM No. 82, and California State Historical Landmark No. 655, which is located adjacent to and east of the Project Site.

(ii) *Sacred Lands File Search*

Two Sacred Lands File (SLF) search requests were submitted to the NAHC to identify traditional-use areas or sacred sites within and near the Project area and to obtain a list of specific Native American groups or individuals that may have knowledge of Native American resources within the Project area. The first SLF search was requested in 2017 and yielded positive results and a recommendation to contact the Gabrieleño Band of Mission Indians—Kizh Nation for specific information. Five additional points of contact were provided. A separate SLF search was requested and negative results were received from the NAHC on April 18, 2022. The NAHC provided a Native American—contacts list consisting of 10 contacts that could potentially provide information on traditional-use areas or sacred sites within the

Project area. Tribal outreach and consultation under Assembly Bill 52 were conducted for the Project by the City. Refer to Section IV.N, Tribal Cultural Resources, of this Draft EIR, for a summary of the tribal consultation process.

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; or

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 also considers the factors identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate cultural resources:

(1) Historical 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 would have a significant effect on the environment if the project would result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(b).²⁸ 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.”²⁹

(2) Archaeological Resources

Would the project disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100 years old³⁰ and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

b. Methodology

(1) Historical Resources

Under CEQA, the evaluation of impacts to historical resources requires 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 will result in a “substantial adverse change” in the significance of the resource or resources. A “substantial adverse change” in the significance of a historical resource is an alteration that

²⁸ *Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).*

²⁹ *CEQA Guidelines Section 15064.5(b)(1).*

³⁰ *Although the CEQA criteria state that “important archaeological resources” are those which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.*

materially impairs the physical characteristics that convey its historical significance and justify its eligibility for listing as a historical resource.

For the purposes of evaluating potential impacts to historical resources, this section is based on information provided in Buena Vista Historic Resources Technical Report (Appendix C.1 of this Draft EIR) prepared by Historic Resources Group in June 2025. The Historical Report is based, in part, on a field inspection of the Project Site, building permits, historical photographs and aerial images, Sanborn Fire Insurance maps, historical periodicals, historical building plans, previous surveys and environmental reviews, local histories, historic context statements, the Los Angeles Historic Resources Inventory (i.e., HistoricPlacesLA website), the Los Angeles Historic-Cultural Monuments list, the LAMC, and a review through an SCCIC records search of the 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 of Historical Resources, 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.³¹

(2) Archaeological Resources

The evaluation of the Project’s potential impacts to archaeological resources is based on the Cultural Resource Assessment prepared for the Project and included in Appendix C.2 of this Draft EIR. As detailed in the Cultural Resource Assessment, the archival and historical background research included the following sources: the Historical Report, the Los Angeles Citywide Historic Context Statement, reports and articles concerning treatment of exposed sections of the Zanja Madre, and the Hazardous Materials Report³² prepared for the Project, which contains information about oil wells reported within the Project area and a summary of known buildings within the Project area. In addition, three formal record searches were conducted by the SCCIC to assess the archaeological sensitivity of the Project Site and vicinity. Archaeological fieldwork was also conducted, which involved an intensive systematic pedestrian survey of the Project Site to identify and record prehistoric or historical-period cultural resources. An Archaeological Test Excavations and Additional Ground-Penetrating-Radar Assessment (GPR Assessment), which is included as Appendix B of the Cultural Resource Assessment, was also conducted to test whether two exposed

³¹ *Public Resources Code, Section 21084.1.*

³² *Ramboll Americas Engineering Solutions, Inc., Hazards and Hazardous Materials Technical Report for the Buena Vista Project, May 2025. Refer to Appendix F of this Draft EIR.*

sections of mortared brick on the hillslope in the northeastern portion of the Project area were related to the Zanja Madre.

c. Project Design Features

The following Project Design Feature is proposed with regard to historical resources:.

Project Design Feature CUL-PDF-1: The Project will include an on-site interpretative display commemorating the history of the River Station site. Interpretive displays in these areas may utilize a combination of text, images, perspective drawings, and maps to convey the development history and historical importance of the River Station rail yard and its immediate surroundings over time.

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

As described above, the Project Site consists of a portion of the River Station site, which is designated as Los Angeles HCM No. 82 and is considered a historical resource for the purposes of CEQA.³³

(a) Direct Impacts

The Project would construct a new mixed-use residential and commercial development, including multiple structures standing between two and 26 stories in height, over multiple levels of partially subterranean parking. To provide for the Project, all buildings, structures, and remnant features, would be removed from the Project Site.

As discussed above, the Project Site consists of a portion of the River Station site, which is designated as Los Angeles HCM No. 82 and is considered a historical resource for the purposes of CEQA. The Project would result in considerable new construction on a portion of a designated historical resource. However, based upon a detailed analysis of the Project Site and its existing features, along with an understanding of the unique nature of the locally-designated HCM that comprises the historical resource on the Project Site, and the

³³ *The Zanja Madre is being treated as an archaeological resource for the purpose of this environmental review. As such, this feature is not evaluated in this section, and potential impacts of the Project to this feature are not analyzed herein.*

Project Site's historical relationship with River Station over time, the Project would not result in a substantial adverse change to a historical resource as defined by CEQA.

As described in Historical Report, in order for a change to a historical resource to be considered a "substantial adverse change," it must be shown that the change would materially impair the significance of the historical resource.³⁴ That is, a project which demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historic significance would materially impair the significance of a historical resource, and thus would constitute a "substantial adverse change" under CEQA. As described above, when the River Station site was designated as a HCM in 1971, buildings and structures were specifically excluded from the designation. Despite the fact that many rail-related features were present throughout the River Station site at the time of designation, almost all of these features have been removed or covered up over time such that little or no visible evidence of the former rail yard is currently evident. Thus, the former River Station site is considered historically significant as the location of important railroad activities only, and no physical structures or features directly contribute to its historic significance. The understanding that HCM No. 82 derives its historic significance as a site only, and not from extant physical fabric, has been reiterated and supported by the City since its 1971 designation. Therefore, any demolition and new construction within the boundaries for HCM No. 82 would not necessarily constitute a significant impact as defined by CEQA. The only remaining feature of HCM No. 82 that reflects its history as a rail yard is the irregularly-shaped, uninterrupted open space occupying flat land at the base of the Elysian Hills just west of the Los Angeles River and north of downtown, wedged between North Spring Street and a steep bluff along what is now North Broadway. The existing Los Angeles State Historic Park, which encompasses the overwhelming majority of the former rail yard site, effectively preserves the flat, open expanse of land characteristic of the former River Station rail yard. The existence of the Los Angeles State Historic Park retains the former rail yard's original location, boundaries, and open space such that the site can still be understood as a former rail yard. Interpretive displays also reference the rail yard history.

By contrast, the Project Site comprises the northern and westernmost edges of the River Station site, which appears to have been largely ancillary to the functioning of the River Station throughout its history. The majority of the Project Site is located along the top of the steep bluff that defines the edge of the Los Angeles State Historic Park site. The abrupt grade change and steep slope would have rendered this portion of the River Station site impractical for most railroad uses. Additionally, the center portion of the Project Site narrows substantially between the bluff and North Broadway, making it undesirable for development of any kind. For these reasons, development on the Project Site has been very limited over time. When it did occur, it was typically composed of small-scale commercial or residential

³⁴ Refer to page 4 of the *Historic Resources Technical Report prepared by Historic Resources Group and provided in Appendix C.1.*

structures in the northern or southern portions of the Project Site, oriented toward North Broadway and largely unrelated to the rail yard below.

The demolition and new construction associated with the Project would not materially impair or diminish the ability of HCM No. 82 to convey its historic significance as the site of the River Station rail yard because: (1) HCM No. 82 is historically significant as the site of important railroad activity only and its designation does not include any physical buildings or structures; (2) historic use of the Project Site portion of HCM No. 82 was ancillary to railroad operations; and (3) the large expanse of open land historically associated with the River Station rail yard is preserved as Los Angeles State Historic Park. Therefore, the Project does not have the potential to result in significant direct impacts on a historical resource. In addition, the Project would implement CUL-PDF-1, listed above, which requires an on-site interpretative display commemorating the history of the River Station site.

(b) Indirect Impacts

As discussed in Subsection 2.b.(2), above, the Study Area contains 15 previously identified historical resources for the purposes of CEQA, including two properties which are located within an identified historic district.

With new buildings rising as high as 26 stories, the proposed development would be substantially taller than the existing historical buildings located in the immediate vicinity of the Project Site. However, this effect would be moderated by massing that concentrates density to select portions of the Project Site. On the South Parcel, the podium would be six stories in height and constitute the majority of new construction facing North Broadway. Density is concentrated in Buildings 1 and 2, which are set back from the podium level, effectively reducing the perception of mass and height from street level. The placement of Building 1 and Building 2 incorporate setbacks from the west, allowing the podium level height to define the western edge of the Project Site along North Broadway. Similarly, the majority of construction on the North Parcel is limited to six stories or less with height concentrated in the 15-story North Building as the Project Site's north end. The Central Greenspace spanning the central section of the Project Site, which would not include any substantial new buildings, also would moderate the perception of density by allowing views looking east from North Broadway to remain. In addition, the Project's north-facing façades includes active retail uses on the ground-floor with direct pedestrian access at street level as well as landscaped plazas. The proposed new buildings would orient to the sidewalk, continuing the pattern of the street facing buildings along North Broadway.

As discussed above, historic integrity is the ability of a property to convey its significance. The National Park Service defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. According to National Park Service guidance a property must possess several, and usually most, of the seven aspects

of integrity in order to convey its historic significance. Because all new construction would be contained within the Project Site, and the Project would not result in direct physical changes to any of the individual historical resources located in the Project vicinity, the Project would not affect the integrity of *location, design, materials, or workmanship* of any of those resources. All of the historical resources in the vicinity would remain intact in their current locations and would not be materially altered by new construction associated with the Project. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize these resources would continue to convey the resources' historic significance. Because all historical resources located in the vicinity would retain integrity of *location, design, materials, workmanship, and feeling*, these resources would continue to reflect their historic significance, and therefore integrity of *association* would also remain unaffected by the Project. After the Project is constructed, all historical resources in the Project vicinity would fully retain integrity of *location, design, materials, workmanship, feeling and association*. The only aspect of integrity that could potentially be affected by the Project is *setting*.

The Project includes new construction that would introduce new uses on a site that has been occupied by low-density, low-scale development. Thus, the Project would result in an alteration to the immediate surroundings of the historical resources in the immediate vicinity. However, in order for this alteration to be considered a substantial adverse change to the setting of the resource, it must be shown that the significance of the historical resource would be materially impaired by the proposed alteration. Setting features important to the significance of individual historical resources in the Project vicinity are typically limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. For example, for the Buena Vista Street Viaduct, located adjacent to the northernmost portion of the Project Site, the Los Angeles River is also a critical component of the resource's setting. None of these setting features would be changed by the Project. The Project Site's historical character as occupied by low-density, low-rise development is not an important aspect of the setting of surrounding historical resources. Additionally, the Project Site's existing character as a predominately low-density site is circumstantial and is not critical to understanding the significance of historical resources in the immediate vicinity. Thus, while the Project Site is situated within the immediate surroundings of several historical resources, it is not considered a critical or character-defining aspect of the setting of these historical resources. Moreover, the immediate surroundings, are distinctly urban in nature and characterized by a diverse collection of commercial, residential, and institutional buildings of various scales, types and styles, dating from the late-19th century to the present. The setting of these historical resources has evolved since their original construction, yet all have still maintained sufficient integrity to convey historic significance.

Similarly, the East of Hill Street Chinatown District is located southwest of the Project Site. The Project Site is outside of the district boundary and is separated by North Broadway. The Project would not demolish, relocate, or alter any contributing or non-contributing

building within this district. Additionally, new construction associated with the Project would not take place in any area located within the district boundary. The Project would not affect the integrity of any of the district contributors or the district as a whole. All the contributing buildings would remain intact in their current locations and would not be materially altered by the Project. Therefore, the East of Hill Street Chinatown District would continue to convey its significance after construction of the Project.

Potential indirect impacts of the Project are also associated with vibration from short-term construction activities that could have the potential to result in a substantial adverse change to the two immediately adjacent historical resources: the Capitol Milling Company building, located immediately south of the Project Site, and the Buena Vista Street Viaduct, located north of the Project Site. Although the Capitol Milling Company is a historic structure, it is not currently considered a structure that would be sensitive to vibration due to construction activities because it has recently undergone substantive renovation. However, there is a small unreinforced masonry building (believed to have been used for storage at some point) located on the boundary of the Capitol Milling Company property, adjacent to the southwesterly corner of the Project Site that is assumed to be vibration sensitive. The Buena Vista Street Viaduct is located adjacent to the northernmost portion of the North Parcel, and a retaining wall and guardrail, assumed to be historic due to the connection with the viaduct, is located directly adjacent to the North Parcel in the public right-of-way. The retaining wall is assumed to not be vibration sensitive, due to its status as a component of a major piece of transportation infrastructure. Nonetheless, because it is likely associated with, or a part of, a historical resource, vibration due to construction could result in a significant impact.

Therefore, the Project would have the potential to indirectly cause a change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 and mitigation is required.

(2) Mitigation Measures

Mitigation Measure NOI-MM-3, as presented in Section IV.J, Noise, of this Draft EIR, which requires monitoring and shoring design and implementation during construction, is required to mitigate for potential short-term vibration impacts to the single-story storage building within the Capitol Milling Company property and the retaining wall and concrete guardrail bridge abutment on the Buena Vista Street Viaduct bridge during construction activities.

(3) Level of Significance After Mitigation

Project-level impacts related to historical resources would be less than significant with implementation of the Mitigation Measure NOI-MM-3.

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

(1) Impact Analysis

Excavation depths proposed for the Project are expected to extend approximately 51 feet below grade. Additionally, it is estimated that approximately 237,364 cubic yards of soil would be exported from the Project Site.

As detailed above in subsection 2.b.(3)(d)(i), the SCCIC records searches identified 78 cultural resource studies conducted within 1 mile of the Project Site (none of which were located on the Project Site) and 206 resources, three of which overlap or are adjacent to the Project Site, including: two separately recorded segments of the Zanja Madre (P-19-003103/CA-LAN-3103 and P-19-190309) and the River Station site (P-19-003120/CA-LAN-3120, LA HCM No. 82).

(a) Prehistoric Archaeological Resources

The likelihood that intact prehistoric remains are preserved within the Project Site is low, but it is possible, given the age of the underlying geologic deposits and the proximity to the Los Angeles River and the ethnographic villages of Yaangna and Maungna. As discussed in the Cultural Resource Assessment, though not expected, prehistoric deposits would be more likely to be preserved in areas where the natural topography has been minimally altered by historical-period and recent construction, particularly in some portions of the South Parcel. In the unlikely event that prehistoric materials or deposits are preserved within the Project Site, those items may provide information concerning the prehistoric or ethnographic use of the greater Los Angeles area. If they do provide such information, it appears that they would be potentially eligible for listing in the California Register under Criterion 4, and possibly under other criteria, as well. A simplified buried-site-sensitivity assessment conducted for the Project Site determined that portions of the South Parcel are sensitive for buried cultural resources. Proposed construction depths during excavations for the three parking levels associated the South Parcel would extend below the fill and would impact soils and sediments with a high sensitivity for containing buried cultural resources. The maximum depth at which buried archaeological resources could be expected beneath these portions of the Project Site is currently unknown. Therefore, due to the sensitivity of deposits on the Project Site, the potential for significantly impacting buried archaeological resources would be significant without mitigation.

(b) Historical-Period Archaeological Resources

As discussed above, the Zanja Madre segments within the South Parcel and adjacent to the Project Site are historical resources under CEQA. This water-conveyance feature is directly associated with important historical events, namely the establishment and success

of the Pueblo of Los Angeles and the transformation of the Pueblo into the City of Los Angeles. Portions of this resource remain buried, and if intact, they could provide important information about the provision of a critical water supply that enabled the successful settlement and growth of Los Angeles, particularly during the period of transition of the resource from an open-ditch watercourse to an enclosed, engineered brick-masonry feature.

As discussed above, the California OHP previously determined that an intact segment of the Zanja Madre near the Project Site was not eligible for listing in the National Register because it did not retain sufficient integrity and was not a “rare surviving element” of the water-conveyance system. Since that determination was made, additional segments of the Zanja Madre elsewhere in the City have been encountered and demolished. Intact portions of the brick feature within the Project area are among the remaining portions that still have potential to provide data and the opportunity for creative mitigation through public interpretation.

CEQA also requires the lead agency to consider whether the Project will have a significant effect on historical resources of an archaeological nature and to avoid archaeological resources, when feasible, or mitigate any effects to less-than-significant levels (CEQA Guidelines Sections 15064.5(c) and 15126.4(b)(3)). By CEQA definition, the Zanja Madre is a unique archaeological resource and historical resource. The Zanja Madre contains important information capable of answering research questions related to the transition period from the original open ditch to the enclosed brick conduit.

Project implementation would require the removal of on-site segments of the Zanja Madre during construction. In addition, if existing off-site segments are adjacent to the Project-related construction activities, is possible that a portion of the off-site resource could be impacted due to removal of on-site components.

(c) Summary

Based on the above, the Project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 and mitigation is required.

(2) Mitigation Measures

The following mitigation measure is included to address the Project’s potential impacts to archaeological resources:

Mitigation Measure CUL-MM-1: Prior to the start of Project ground disturbance, including demolition and vegetation removal, a qualified principal archaeologist meeting the Secretary of the Interior’s Professional

Qualifications Standards for Archeology shall be retained to prepare and implement a written Cultural Resources Monitoring and Treatment Plan (CRMTP). The CRMTP shall be prepared in coordination with the Department of City Planning, Office of Historic Resources (OHR) and shall be subject to OHR's review and approval.

The CRMTP shall dictate the process for addressing known archaeological resources as well as un-anticipated archaeological resources that may be unearthed during construction, which would include potential prehistoric and historical-period discoveries. In order to account for any such unanticipated resources, the CRMTP shall include a requirement to develop and implement a Worker Environmental Awareness Program (WEAP) that sets forth protocols to train onsite construction workers to identify and appropriately respond to discovery of potential cultural resources that may be inadvertently encountered during earthmoving activities.

The CRMTP shall include protocols for construction monitoring for buried cultural resources that will occur during all excavation activities unless otherwise specified in the CRMTP. Specifically, the CRMTP will reiterate the varying archaeological sensitivity across the Project Site, and the situations under which monitoring may be reduced or discontinued. The CRMTP will describe monitoring protocols for potential Young alluvial-fan deposits in the South Parcel at depths greater than 3 m and extending to the base of excavation, and for areas near the anticipated alignment of the Zanja Madre. Archaeologically relevant sediments may be present at significant depths (greater than 3 m [10 ft]). At a minimum, the Young alluvial-fan deposits should be considered sensitive for buried cultural resources to the base of proposed excavations within the South Parcel.

The CRMTP shall expand upon existing available historic contexts and cultural contexts, focusing on the themes and research questions that demonstrate the significance of the Zanja Madre and other currently unknown cultural resources that may be present. This shall ensure that baseline information required to effectively document the Zanja Madre and/or evaluate the significance of other cultural resources discoveries that could be made during Project activities are in place prior to initiation of construction activities. The CRMTP shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. The CRMTP shall include detailed methods to be taken during stop-work situations, assessment of preservation in place or recovery of potential cultural deposits, and evaluation of resources in terms of CRHR and NRHP eligibility.

The CRMTP shall include specific protocols regarding work in proximity to the exposed sections of the Zanja Madre within the Project Site and the anticipated locations of additional Zanja Madre sections or fragments that may be buried on-site, including protocols for monitoring, recording, photographing, and artifact collection. The protocols detailed in the CRMTP shall include the three elements detailed below, in a manner commensurate with the significance of the Zanja Madre and adequate for recovering and preserving scientifically consequential information provided by the resource. The CRMTP shall require outreach to local Stakeholders. Stakeholders that shall be contacted include, but are not limited to, local historical societies, museums, and subject matter experts. Prior to the issuance of a grading permit, the Applicant shall organize this Stakeholder Committee, subject to the review and approval of the City, to inform the development, execution, and maintenance of a plan for public interpretation and memorialization of the Zanja Madre. This Zanja Madre Interpretation and Memorialization Plan shall be either a standalone document or included as an independent appendix to the CRMTP, prepared by the Applicant, with input from the Stakeholder Committee, and subject to approval by OHR. A copy of the CRMTP shall be provided to OHR once completed.

The Zanja Madre Interpretation and Memorialization Plan may include any or all of the following, or other interpretive measures: (1) removal, preservation, and relocation of an intact section of the Zanja Madre on the Project Site, if feasible; (2) collection and reuse of bricks from the Zanja Madre in an interpretive installation, such as a water feature on the Project Site; (3) delineation of the Zanja Madre's original alignment through decorative elements on pedestrian paths or walls on the Project Site; (4) installation on the Project Site of murals or other public art-work referencing the Zanja Madre and interpreting its historical significance; (5) a scenic overlook at the Project Site for viewing and interpreting the exposed Zanja Madre section on the Metro A Line ROW; and (6) inclusion of the public through educational programs/curricula, virtual interpretive content, and other methods. This protocol requires preconstruction research and design planning to enhance opportunities for interpreting the important culture history of the area.

The CRMTP shall include specific protocols for exposing any intact portions of the Zanja Madre via archaeological excavation, with recovery of important data, such as evidence of the original open-ditch zanja, construction methods, information about associated artifacts, and collection of bricks for public interpretation. This protocol requires preconstruction research and archaeological excavation as well as construction monitoring and treatment of any additional portions of the Zanja Madre encountered during construction.

The CRMTP shall require the preparation of documentation for an appropriate section of intact zanja meeting the provisions of the Historic American Engineering Record (HAER). This process shall expand upon research and fieldwork to expose segments of the Zanja Madre feature. Documentation shall include pertinent narrative records, measured drawings, high-accuracy GPS/geographic information system (GIS) recordation, photographs in conformance with HAER standards, and other appropriate documentation ensuring City Guidelines and best practice standards are met. A copy of the HAER shall be provided to OHR once completed.

In locations where the Zanja Madre is anticipated to extend beyond the Project Site onto other properties, efforts shall be made to prevent damage to the feature at those junctures, ensuring that construction activities will not compromise the feature in adjacent parcels using appropriate construction limits marking and other protective measures as feasible from within approved Project limits.

The CRMTP shall also include protocols for construction monitoring for buried cultural resources for those portions of the Project Site that are sensitive for buried cultural resources. As shown in Appendix A of the Cultural Resource Assessment included as Appendix A to the Draft EIR, these areas include soils from Unit 1 of the Young alluvial-fan deposits and are located within the South Parcel.

See also Mitigation Measure NOI-MM-3, presented in Section IV.J, Noise, of this Draft EIR, which includes monitoring and shoring design and implementation during construction to address potential vibration impacts to off-site segments of the Zanja Madre during temporary construction activities.

(3) Level of Significance After Mitigation

. With implementation of Mitigation Measure CUL-MM-1 and Mitigation Measure NOI-MM-3, potential Project-level impacts related to archaeological resources would be reduced to less-than-significant levels.

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

As evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project Site is developed with several structures and paved areas and has been previously disturbed. The Project Site is not known to have been utilized for religious or sacred purposes or as a burial area. In addition, as set forth in the Cultural Resources Report, the likelihood that prehistoric or historical-period human remains are preserved within the Project footprint is low. If human remains are uncovered during excavation activities, the

contractor would comply with Section 7050.5 and 7052 of the California Health and Safety Code and Sections 5097.98 and 5097.99 of the California Public Resources Code on the proper identification, treatment, and disposition of the remains. This includes notification of the County Coroner within 24 hours of the discovery; protection of the discovery site from further disturbance; County Coroner notification of the NAHC if the remains are believed to be Native American; NAHC notification of the persons to be the most likely descendant (MLD) of the deceased Native American; and MLD inspection and recommendation on the disposition of the human remains, which may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials or reburial of the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance. Therefore, the Project would not have a significant potential to disturb any human remains, including those interred outside of formal cemeteries. **As such, as concluded in the Initial Study, impacts with respect to Threshold (c) would be less than significant. In addition, while impacts are concluded to be less than significant, Mitigation Measure CUL-MM-1 includes the unanticipated uncovering of human remains as part of the Project's Cultural Resource Monitoring and Treatment Plan.**

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated as early as 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable Project Design Features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, given that cultural resources do not typically vary over the course of a 20-year timeframe, a later buildout date would not affect the impacts or significance conclusions presented above. Likewise, in the event of an extended buildout, any development on the Project Site would be subject to Mitigation Measures NOI-MM-3 and CUL-MM-1.

f. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, there are a total of 25 related development projects that have been identified in the general vicinity of the Project Site through 2034, the Project's anticipated buildout year. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office, industrial, studio and retail uses, as well as mixed-use developments incorporating some or all of these elements. 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, restaurant, hotel, transit, and office uses, consistent with existing uses in the vicinity of the Project Site.

(a) Historical Resources

Impacts on historical resources tend to be site-specific. However, cumulative impacts on historical resources would occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property as those within the Project Site. As discussed in the Historical Report, included in Appendix C.1 of this Draft EIR, of the 25 related projects, nine are located within 1,000 feet of the Project Site and therefore are the focus of this cumulative impacts analysis.

- **Related Project No. 1** involves the construction of 318 condominium units at 1101 N. Main Street. Related Project No. 1 is not located within the immediate vicinity of any of the identified historical resources. Therefore, the Project in combination with Related Project No. 1 would not have the potential to result in a cumulatively considerable impact to the historic setting of any historical resources and cumulative impacts would be less than significant.
- **Related Project No. 5** involves the construction of 725 apartment units and 51,600 square feet of commercial space at 129 W. College Street and 924 N. Spring Street. Related Project No. 5 is located south/southeast of the Project Site, across N. Spring Street from two historical resources: the historical resource at 1231 N. Spring Street (Capitol Milling Company), and the historical resource at 1245 N. Spring Street (River Station, now Los Angeles State Historic Park). As described above, the Project would not result in any significant impact to either of these historical resources. The Project would result in an alteration to the immediate surroundings of the historical resources; however, it would not reduce the resources' integrity of setting. None of the setting features would be changed by the Project. Therefore, the Project in combination with Related Project No. 5 would not represent a cumulatively considerable impact to the historic setting of either of these historical resources and cumulative impacts would be less than significant.
- **Related Project No. 7** involves the construction of 118 apartment units and 8,800 square feet of commercial/office space at 1201 N. Broadway. Related Project No. 7 is located north/northwest of the Project Site, across Bishops Road from the historical resource at 1253 N. Bishops Road (Cathedral High School). As described above, the Project would not result in any significant impact to this historical resource. The Project would result in an alteration to the immediate surroundings of the historical resource; however, it would not reduce the resource's integrity of setting. None of the setting features would be changed by

the Project. Therefore, the Project in combination with Related Project No. 7 would not represent a cumulatively considerable impact to the historic setting of this historical resource and cumulative impacts would be less than significant.

- **Related Project No. 11** involves the construction of 178 residential units and 35,805 square feet of restaurant and office space at 942 N. Broadway. Related Project No. 11 is located southwest of the Project Site, immediately adjacent to the historical resource at 1231 N. Spring Street (Capitol Milling Company), and across Broadway from the East of Hill Street Chinatown District. As described above, the Project would not result in any significant impact to either of these historical resources. The Project would result in an alteration to the immediate surroundings of the historical resources; however, it would not reduce the resources' integrity of setting. For the Capitol Milling Company, setting features that are important to its significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of the setting features would be changed by the Project.

Regarding the East of Hill Street Chinatown District, aspects of the district's setting that are important to its significance are contained within the boundaries of the district itself. The commercial development that comprises the East of Hill Street Chinatown District was conceived as a comprehensive themed environment which is inwardly focused and does not engage with its urban surroundings. As such, important aspects of the district's setting include its internal pedestrian circulation pattern; overall arrangement and configuration of contributing buildings and other built features (walkways, plazas, landscape features, public art); and the spatial and visual relationships between and among these contributing features. None of the setting features would be changed by the Project. While the Project and Related Project No. 11 would both add new visual features to the surroundings of the historic district, the area beyond the boundaries of the district does not contribute to the significance of the historical resource. Furthermore, while these new features may be visible from certain vantage points within the district boundaries, this would not diminish the ability of the historical resource to convey its significance. Therefore, the Project in combination with Related Project No. 11 would not represent a cumulatively considerable impact to the historic setting of this historical resource and cumulative impacts would be less than significant.

- **Related Project No. 13** involves the construction of 100,517 square feet of office and restaurant space at 843 N. Spring Street. Related Project No. 13 is located south of the Project Site. It is also located south of the historical resource at 1231 N. Spring Street (Capitol Milling Company) and is separated from the resource by College Street and another developed parcel at 900 N. Broadway. As described above, the Project would not result in any significant impact to this historical resource. The Project would result in an alteration to the immediate surroundings of the historical resource; however, it would not reduce the resource's integrity of setting. None of the setting features would be changed by the Project. Therefore, the Project in combination with Related Project No. 13 would not represent a

cumulatively considerable impact to the historic setting of either of these historical resources and cumulative impacts would be less than significant.

- **Related Project No. 17** involves the construction of 101 hotel rooms and 6,211 square feet of restaurant space at 995 N. Broadway. Related Project No. 17 is located west of the Project Site. It is situated immediately adjacent to the historical resource at 993 Broadway (Soo Yuen Fraternal Association); one parcel from the historical resource at 989 Broadway (Lung Kong Tin Yee Association); and across Bernard Street from the historical resource at 1001 Broadway. As described above, the Project would not result in any significant impacts to these historical resources. The Project would result in an alteration to the immediate surroundings of the historical resources; however, it would not reduce these resources' integrity of setting. None of the setting features would be changed by the Project. Therefore, the Project in combination with Related Project No. 17 would not represent a cumulatively considerable impact to the historic setting of any of these historical resources and cumulative impacts would be less than significant.
- **Related Project No. 18** involves the construction of 92 hotel rooms, a 1,713-square-foot restaurant, 895-square-foot café/retail space, and a 978-square-foot café at 1101 N. Broadway. Related Project No. 18 is located north/northwest of the Project Site, and immediately adjacent to the historical resource at 1253 N. Bishops Road (Cathedral High School). As described above, the Project would not result in any significant impact to this historical resource. The Project would result in an alteration to the immediate surroundings of the historical resource; however, it would not reduce the resource's integrity of setting. None of the setting features would be changed by the Project. Therefore, the Project in combination with Related Project No. 18 would not represent a cumulatively considerable impact to the historic setting of this historical resource and cumulative impacts would be less than significant.
- **Related Project No. 24** involves the construction of a pedestrian connection to provide access to the Los Angeles State Historic Park from Broadway. However, there is currently no design of the future pedestrian bridge connection, and thus Related Project No. 24 cannot be located in relation to the Project Site or to any identified historical resources. However, as described above, the Project would not result in any significant impact to any historical resource. The Project would result in an alteration to the immediate surroundings of several historical resource; however, it would not reduce these resources' integrity of setting. Therefore, it can be presumed that the Project in combination with Related Project No. 24 would not represent a cumulatively considerable impact to the historic setting of any historical resource and cumulative impacts would be less than significant.
- **Related Project No. 25** involves the construction of an aerial rapid transit gondola system to provide daily transit service to connect the communities of El Pueblo, Mission Junction, Solano Canyon, and William Mead Homes. The proposed route would include stations at Union Station, Chinatown/Los Angeles State Historic

Park, and Dodger Stadium. The Chinatown/State Park Station is located within 1,000 feet of the Project Site. The proposed Chinatown/State Park Station is located south/southeast of the Project Site, and is just across the Metro L Line right-of-way from the historical resource at 1231 N. Spring Street (Capitol Milling Company). As described above, the Project would not result in any significant impact to this historical resource. The Project would result in an alteration to the immediate surroundings of the historical resource; however, it would not reduce the resource's integrity of setting. None of the setting features would be changed by the Project. Therefore, the Project in combination with Related Project No. 25 would not represent a cumulatively considerable impact to the historic setting of this historical resource and cumulative impacts would be less than significant.

As discussed above, short-term vibration from Project construction activities have the potential to impact the Capitol Milling Company property or the Buena Vista Street Viaduct (now North Broadway Bridge). However, implementation of Mitigation Measure NOI-MM-3, would ensure that potential impacts would be less than significant. Furthermore, as is common in similar urban development sites, vibration and settlement would be controlled through the regulatory permit process where design values would be prescribed by the shoring engineer and geotechnical engineer and reviewed by the City with the intent to prevent damage to adjacent structures. Similarly, each of the related projects would be required to implement mitigation measures to prevent any damage to the structural integrity of adjacent structures, including any historical resources.

Based on the above, 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.

(b) Archaeological Resources

Impacts related to archaeological resources qualifying as historical resources or unique archaeological resources under CEQA are in most cases site-specific because they occur on a project level as a result of ground disturbance activities during construction. As discussed above, the Project would result in impacts to the segments of the Zanja Madre, as well as potential impacts to undiscovered archaeological resources, and would implement Mitigation Measures CUL-MM-1 and NOI-MM-3 to reduce potential impacts associated with archaeological resources to a less-than-significant level. Many of the related projects within the cumulative study area would require excavation that could also potentially expose or damage archaeological resources, including portions of the Zanja Madre. However, similar to the Project, depending on the depth of excavation and sensitivity of the respective sites, mitigation measures would be required for the related projects that have the potential to cause significant impacts to undiscovered archaeological resources. As with the Project, such mitigation measures, if implemented, would reduce project level significant impacts of the related projects to a less than significant level. **Therefore, with implementation of**

CUL-MM-1 and NOI-MM-3, the Project's incremental contribution to archaeological impacts would not be cumulatively considerable. As such, the Project and related projects would result in less-than-significant cumulative impacts to archaeological resources.

(2) Mitigation Measures

Cumulative impacts related to cultural resources would be less than significant with incorporation of Mitigation Measures CUL-MM-1 and NOI-MM-3. Therefore, no additional mitigation beyond those included above to reduce Project-level impacts are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to cultural resources would be less than significant without additional mitigation measures beyond those identified for the Project.