IV. Environmental Impact Analysis
B. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Project. Historical resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places (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 the *Historic Resources Technical Report, 130 West College Street, Los Angeles* (Historic Report) prepared for the Project by Historic Resources Group dated July 2024 and the *Archaeological Resources Assessment for the 130 West College Street Project, Los Angeles, California* (Archaeological Report) prepared for the Project by SWCA dated September 2024, which are included as Appendices C.1 and C.2 of this Draft EIR, respectively.

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
- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code, Section 12.20.3)
- City of Los Angeles Historic Resources Survey

(1) Federal

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

The National Historic Preservation Act of 1966 established the National Register 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 (three percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.[2]

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. With

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[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 September 11, 2024.*

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.[4] 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.[5]

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

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

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

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

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

[5] *U.S. Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, page 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.[6]

(ii) Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15, which provides guidance on evaluating properties for inclusion in the National Register, states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific … property or site is understood and its meaning … is made clear."[7] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

(iii) Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance."[8] The

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

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

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

National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.[9] 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 altered more 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.[10] 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.[11] 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

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[9] *U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 44.*

[10] *U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 25.*

[11] *U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 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

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.[12] 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.

[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.*

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.[13]

It is important to note that the Standards are not intended to be prescriptive but, instead, provide general guidance.[14] 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.

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[13] *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.*

[14] *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.[15]

(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.[16]

(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

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[15] *U.S. Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, 1990.*

[16] *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.[17] 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.[18]

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,

[17] *California Public Resources Code Section 21083.1(a).*

[18] *State CEQA Statute and Guidelines, Section 15064.5(c)(4).*

destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired."[19] 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.[20]

(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."[21] 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.[22] 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:

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[19] *State CEQA Statute and Guidelines, Section 15064.5(b)(1).*

[20] *State CEQA Statute and Guidelines, Section 15064.5(b)(3).*

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

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

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

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

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

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

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the 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

Assembly Bill 2641 amended PRC Section 5097.98, which 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.[23]

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

1. Historic-Cultural Monument (HCM)

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

(ii) Central City North Community Plan

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

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

- 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.
    - Policies 17-1.1: Encourage the preservation, maintenance, enhancement, and reuse of existing buildings and the restoration of original façades.
  - Objective 17-2: To encourage private owners of historic properties/resources to conserve the integrity of such resources.

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

- Policies 17-2.1: Assist private owners of historical resources to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.

- 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.

    - Policy 18-1.1: Support the existing artists community in Central City North as a cultural resource for 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;

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

3) The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.[24]

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:

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[24] *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?[25]

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."[26]

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[25] *City of Los Angeles, Office of Historic Resources Info Brief, What Makes a Resource Significant?, https://planning.lacity.gov/odocument/fcd76b35-7140-48ef-ad50-2506f270d0d8/Info%20Brief%20What%20Makes%20a%20Resource%20Significant.pdf, accessed June 30, 2025.*

[26] *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.[27] 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.[28] 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 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 to 2017, were completed in three phases by community plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of

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[27] *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

[28] *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

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) Existing Uses on the Project Site and in the Surrounding Area

The Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site but there is a billboard, lighting, a shipping container, six electric bus chargers, and fencing. The area surrounding the Project Site is urbanized and includes a mix of low- to mid-rise buildings containing a variety of industrial, commercial, and residential uses. The Los Angeles State Historic Park is located approximately 650 feet north of the Project Site.

(2) Cultural Background

The following is based on information provided in the Historic Report and Archaeological Report provided as Appendix C.1 and Appendix C.2, respectively, of this Draft EIR.

(a) Ethnographic Overview

The Project Site is in an area historically occupied by the Gabrielino (sometimes spelled Gabrieleno or Gabrieleño). Surrounding Native American groups included the Chumash to the northwest, the Tatataviam/Alliklik to the north, who traditionally occupied the San Fernando Valley and some of the surrounding areas, the Serrano to the east, and the Luiseño/Juaneño to the south. There was well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The name Gabrielino is a term designated through Spanish custom, which named local tribes according to the nearest mission. Native Americans near Mission San Gabriel Arcángel were therefore named "Gabrielino." There is little evidence that the people we call Gabrielino had a broad term for their group. Instead, they reportedly identified themselves as inhabitants of a specific community with locational suffixes; for example, a resident of Yaanga was referred to as a Yabit, much the same way that a resident of New York is called a New Yorker. Native words that have been suggested for the broader group of Native Americans indigenous to the Los Angeles region also include Tongva and Kizh, although there is evidence that these terms originally referred to local places or smaller groups of people within the larger group that we now call Gabrielino. Many present-day descendants of these people have taken on Tongva and Kizh as a preferred group name, in part because of the Native American rather than Spanish origin. Because there is no agreement over the most appropriate indigenous term for this group, unless referring to a specific tribe, the term Gabrielino is used in the Tribal Report and the remainder of this discussion to designate Native people of the Los Angeles Basin and southern Channel Islands and their descendants.

The Gabrielino subsistence economy centered on hunting and gathering. Like for most Native Californians, acorns were their staple food. Inhabitants supplemented acorns with the roots, leaves, seeds, and fruits of a variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed.

The Gabrielino used a variety of tools and implements to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands. Gabrielino people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite (soapstone) was used to make ollas and cooking vessels.

At the time of Spanish colonization, the basis of Gabrielino religious life was the Chinigchinich religion, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions and also taught the people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws. The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the southern Takic groups even as Christian missions were being built and may represent a mixture of Native and Christian belief and practices.

Deceased Gabrielino were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast, and cremation predominating on the remainder of the coast and in the interior. Remains were buried in distinct burial areas, either associated with villages or without apparent village association. Cremation ashes have been found in archaeological contexts buried within stone bowls and in shell dishes, as well as scattered among broken ground stone implements. Archaeological data such as these correspond to ethnographic descriptions of an elaborate mourning ceremony that included a variety of offerings, such as seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased.

Native American settlements and sites in the Project vicinity include the village of Yaanga, believed to be approximately 0.2 miles south of the Project Site and Geveronga believed to be located approximately 2.6 miles southeast of the Project Site. Refer to Section IV.J, Tribal Cultural Resources, of this Draft EIR for a detailed discussion of these settlements.

(b) Development History of the Central City North CPA

As discussed in detail in the Historic Report, the Central City North CPA was first utilized as agricultural land before serving as the City's first industrial district. A vineyard was established in the area in the 1830s and became the largest producer of wine in California. In 1849, the California Gold Rush created a large demand for citrus fruit, which was used to protect miners against scurvy, and oranges and grapefruit replaced grapes as the area's primary crops. The Central City North CPA remained predominantly agricultural until 1871 when the northern portion was subdivided and developed with single-family residences. Rail lines and manufacturing plants also emerged in the mid-1870s to serve the citrus industry's shipping needs.

(i) Southern Pacific Railroad

As discussed in the Historic Report, 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 Company offered to build a rail connection in Los Angeles that would extend north to San Francisco and Sacramento, and east to Yuma, and beyond. By 1875, Southern Pacific's River Station was under construction. In its first years, River Station served as the key transportation center for Southern Pacific in California, both for freight and passengers. Many carloads of equipment and supplies passed through the station each day as the line advanced eastward toward El Paso. The arrival of the Southern Pacific railroad also helped sell Southern California and Los Angeles to the rest of the country, leading to a short boom in the 1870s.

(ii) Industrial Development

By the turn of the 20th century, businesses had begun to capitalize on the convenience of locating their operations near rail lines. A 1909 map of the area notes the large number of warehouses and storage facilities which had been constructed in just a few years, as well as a wide variety of processing and manufacturing operations including lumber yards, freight yards, ice and cold storage, slaughterhouses and meatpackers, produce companies and canneries, and blacksmiths, among others.

As the railroads increased mobility, Los Angeles ceased to be simply a market for manufactured goods produced in San Francisco and the east, but begun to support local industries as well. Similarly, as agricultural activities in other areas of the City supplanted those near the city center, the area evolved from simply a shipping hub to a processing and manufacturing center in its own right. In particular, businesses related to the building trades had expanded rapidly beginning in the 1880s when the first regional real estate boom spurred residential and commercial construction. As a result, a number of lumber, construction, and furniture trades established operations in the area. In the early decades of the 20th century, many of the area's industrial buildings were one of two types: manufacturing or processing facilities and warehouses.

By the 1920s, the area was fully established as an industrial hub. This was aided in part by the pattern of development occurring outside the central city. As the City continued to annex existing communities as well as available land in the San Fernando Valley, zoning was amended to eliminate residential development in the downtown area. By 1922, the City officially rezoned the downtown area to accommodate the construction of more offices, retail, and manufacturing facilities. By the 1950s the area was home to a number of industries including manufacturing, trucking and transport, food processing, and lumber and woodworking operations. While the types of industrial uses evolved over time, the area nevertheless maintained its character as an industrial center.

(iii) Zanja System

As discussed in the Archaeological Report, from Los Angeles' beginnings as a small pueblo, water was understood as a crucial force to control and use if the settlement was to survive. Since the 1770s, a canal known as the Zanja Madre had been diverting water from the Los Angeles River to the newly established pueblo. The Zanja Madre was the main source of water for the early irrigation system in Los Angeles and formed the central artery for the zanja system. The pueblo's residents used this water for ranching, agriculture, drinking, bathing, and washing clothes. Gravity was sufficient to force the water down the zanja onto the pueblo lands, but the flow of water was not smooth and continuous because the ditch was frequently impeded by debris and damaged during heavy rainfall. As the City grew, new zanjas needed to be built to irrigate increasingly more farmlands. In 1857 the first offshoot known as Zanja No. 1 was completed, which ran between Alameda Street and the Los Angeles River. By 1870 there were a total of eight zanjas covering approximately 50 miles that connected to the Zanja Madre. At this early time, the zanjas were little more than earthen ditches; none was covered or lined, allowing residents to easily steal water.

As discussed in the Archaeological Report, the Project Site was located between the Zanja Madre and Zanja 6-1. The original segment of the Zanja Madre began at an intake point from the Los Angeles River near the present day North Broadway Bridge. From here the channel flowed south in an open ditch along the base of a bluff below Buena Vista Street, now North Broadway. Near the intersection of College Street and San Fernando Street (now closer to the intersection of College Street and Spring Street), the Zanja Madre made an 18-foot drop into a brick conduit supplying water to the Stearns Mill, later called the Capitol Milling Company, located approximately 390 feet northwest of the Project Site. Zanja 6-1 was originally called Zanja No. 2 and was among the water sources for agricultural fields east of Alameda Street and west of the Los Angeles River. The channel splits from the Zanja Madre at the North Broadway Bridge and ran south on the east side of Alameda Street until 1st Street and was originally meant to serve the vineyards and farmlands between Alameda Street and the Los Angeles River.

(c) Development History of the Project Site

As discussed in the Historical Report, the land comprising the present-day Project Site was first recorded as part of the Beaudry Water Works Tract by brothers Prudent and Victor Beaudry in February 1887. A Sanborn Insurance Company fire insurance map drawn in 1888, a year after the tract was initially recorded, notes little development activity having occurred in the interim, with only a few modest dwellings and storefronts fronting North Alameda Street to the north. All but one of the structures depicted consisted of tents. Although a subsequent Sanborn Map drawn in 1894 indicates that the block remained unimproved, newspapers and city directory records indicate that facilities for the Keystone Iron Works may have been erected on the Project Site that same year, and were certainly in

operation as early as 1895, with a foundry situated in the southern portion of the Project Site at present-day 114-116 West College Street.

In October 1899, the northern portion of the Project Site was replatted as part of Lot D of the Freight Deport Tract (MR072-075) by the Southern Pacific Railroad Company. The replatting of the northern portion of the block marked the turning point at which development efforts within the Project Site would diverge for the next eight decades. Once acquired by Southern Pacific, the land comprising the northern portion of the block functioned as a railroad switch yard, serving multiple spur lines arriving at the Southern Pacific's River Station to the northeast. The railroad lines that crossed the Project Site were eventually removed following the reduction of operations and subsequent closure of the nearby River Station. The southern portion of the block was improved with a growing collection of industrial buildings that served a variety of tenants. The Keystone Iron Works remained the primary tenant until the company's relocation to another site around 1920. Following their departure, the Lacy Oil Tool Company became the primary tenant around 1932 and remained in operation there until the company filed for bankruptcy in 1967. In 1970, the County of Los Angeles leased the property at 943-957 North Main Street; at the same time, the School Days Equipment Company leased the adjoining property at 951-973 North Main Street. Manufacturing businesses continued to occupy the Project Site until at least the 1980s, although the number of tenants dwindled over time. In 1992, the existing buildings on the Project Site were demolished. Following the removal of the spur lines in the northern portion of the block and the demolition of the existing manufacturing and warehouse facilities in the southern portion of the block, the entire Project Site was redeveloped as a surface parking lot. Today, the Project Site serves as a school bus parking lot for a transportation company.

(3) Historical Resources

(a) Resources within the Project Site

As discussed in the Historic Report included as Appendix C.1 of this Draft EIR, none of the addresses comprising the Project Site are listed in the National Register or California Register and are not designated as a Los Angeles HCM. The Project Site has not been identified as an eligible resource in any previous survey evaluations. Section 12.1 of the Historic Report includes an evaluation of eligibility for the Project Site to determine if it is eligible as an individual historical resource for the purposes of CEQA. As discussed in the Historic Report, given the Project Site's lack of important historical association with events, trends, or individuals; lack of any buildings or structures; and relatively recent development, the Project Site is not eligible for listing in the National Register or California Register, or for local designation as a Los Angeles HCM. Therefore, the Project Site is not a historical resource for the purposes of CEQA.

(b) Resources in the Vicinity of the Project Site

There is one designated historical resource in the vicinity of the Project Site: granite block paving on West Bruno Street, between North Alameda Street and North Main Street. Because of its unique nature, this resource is addressed in both the Historic Report and Archaeological Report.

As discussed in the Historic Report included as Appendix C.1 of this Draft EIR, the granite block paving is listed in HistoricPlacesLA as an individual resource and was designated as Los Angeles HCM No. 211 in 1979. This resource was listed for its significance as a rare example of hand-hewn granite block paving dating from the early 1900s in Los Angeles. The resource consists solely of granite block pavers within the boundaries of West Bruno Street, adjacent to the Project Site, and does not include any structures. Photos of the pavers are included in Appendix D of the Historic Report. The granite block paving was also identified in background research conducted for archaeological resources and a detailed description of the resource is provided in the Archaeological Report.

(4) Archaeological Resources

As shown in Figure 4 of the Archaeological Report included as Appendix C.2 of this Draft EIR, the Project's area of potential impact (API) includes the Project Site and the linear segments for utility trenches that extend beyond the Project Site.

(a) Records Search Results

Archaeology is the recovery and study of material evidence of human life and culture of past ages. The area surrounding the Project Site is an urbanized area and has been subject to disruption throughout the years. A confidential cultural resources records search was conducted by staff at the South Central Coastal Information Center (SCCIC) for the Project Site and a 0.25-mile radius. The results of this search are on file with the Department of City Planning and may be viewed by qualified personnel. The results of the records search indicate that 36 cultural resources studies have been conducted within a 0.25-mile radius of the Project Site. Of these, seven are mapped as intersecting portions of the API, five intersect a segment of the utility trench for the proposed water line in Alameda Street, and two were for utility trenches within Main Street.[29] None of the studies mapped as intersecting the API included archaeological fieldwork or in-depth analysis specific to the API. Rather, these studies were prepared as overviews of comparatively large areas whose findings provide contextual information for the region but no data that have not otherwise been presented in the Archaeological Report.

[29] *The API is defined as the Project Site plus the areas outside the Project Site that may be required for utility trenching.*

The records search identified eight previously documented archaeological resources within the search radius, one of which is identified within the API. The eight resources identified are all historical archaeological sites and include the following: a segment of the Zanja Madre (designated individually as LAN-3103H but also listed as a component within LAN-4601H and LAN-3120H); structures and artifacts associated with a historical railroad (LAN-3120H, also listed as HCM No. 82 and known as Los Angeles State Historic Park); segments of historical railroad tracks (LAN-4202H); segments of historical roads constructed with paving stones (LAN-4183H and LAN-4200H); and three sites that contained a mixture of structural features and historical refuse (LAN-3181H, LAN-4201H, and LAN-4601H).

(b) Resources within the API

(i) College Street Granite Paving Block (LAN-4183H)

The resource mapped as intersecting a portion of the API is LAN-4183H, one of the historical roads constructed from paving stones along College Street. As discussed in detail in the Archaeological Report, LAN-4183H was previously evaluated for significance in 2011 and determined to be ineligible for federal, state, or local designation. A review of the significance evaluation completed in the 2011 was conducted as part of the archaeological assessment for this Project, which reaffirmed the previous determinations that LAN-4183H is not eligible for listing on the California Register. No information has been identified that demonstrates a connection of the granite paving stones to important events or people (Criteria A and B). Furthermore, the segment of College Street in which LAN-4183H was recorded has been fully repaved with asphalt, providing further confirmation that the resource lacks sufficient integrity to convey historical significance under Criterion C and D. Therefore, LAN-4183H is not considered a historical archaeological resource under CEQA.

(ii) Zanja Components

As discussed in the Archaeological Report, components of the zanja system in the vicinity of the Project Site are segments of Zanja Madre and Zanja No. 6-1. However, a segment of Zanja No. 6-1 is mapped within the API east of the Project Site and appears to have run alongside a road, portions of which became what is now Main Street. SWCA identified substantial evidence indicating that the original zanja was likely destroyed and replaced with a concrete conduit in a slightly different location after the zanja system had otherwise been abandoned. The replaced segment was part of a storm drain construction that repurposed some elements of the original zanja, which elsewhere were historically constructed with similar concrete pipe, but the portion mapped within the API was added in the 1930s and is not similar in age or function to the segments of Zanja No. 6-1 recorded elsewhere as archaeological resources.

(c) Sensitivity Analysis

Although the development history of the Project Site indicates that the presence of a Native American archaeological site is unlikely, the potential of a buried site cannot be ruled out due to the proximity of the Project Site to the Los Angeles River and to known Gabrieliño settlements. Therefore, the analysis in the Archaeological Report concluded that the API has moderate sensitivity for Native American archaeological resources. In addition, as discussed above, the northwestern portion of the Project Site remained unpaved for several decades and was then paved over in association with the razing of the buildings in the southeastern part of the Project Site, which could preserve any underlying deposits within that portion of the Project Site. Historic-age deposits related to the industrial history of the API and surrounding area could be discovered below ground, primarily within the fill soils. Therefore, the analysis in the Archaeological Report concluded that the API has high sensitivity for containing historical archaeological resources.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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).[30] 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."[31]

(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 old[32] and possesses substantial stratigraphic integrity; or

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[30] *Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).*

[31] *CEQA Guidelines Section 15064.5(b)(1).*

[32] *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.*

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

The Historic Report provided in Appendix C.1 of this Draft EIR evaluated the Project Site and vicinity using eligibility criteria and integrity thresholds for listing in the National Register, the California Register, and as City of Los Angeles HCMs. Research, field inspection, and analysis are based upon guidance from the National Park Service, the OHP, and the OHR for evaluating potential historical resources. Sources consulted as part of the investigation included primary and secondary literature regarding the history and development of the Central City North CPA and the associated development of the Project Site over time. Archival sources consulted included but were not limited to historical building permits, historical newspapers, historical aerial photographs, and historical maps including tract, assessor, topographical, and Sanborn Insurance Co. fire insurance maps. A site visit was also conducted on December 21, 2022. Contemporary planning documents were also consulted, which included but were not limited to previous environmental and survey evaluations related to the Project Site as well as contemporary survey efforts, including the 2016 SurveyLA survey of the Central City North CPA.

(2) Archaeological Resources

The Archaeological Report included in Appendix C.2 includes formal records searches to assess the archaeological sensitivity of the Project Site and vicinity. In addition, the existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources. Indicators of Native Americans archaeological sensitivity were also reviewed and include proximity to natural features (e.g., perennial water source, plant or mineral resource, animal habitat) and other known Native American archaeological sites, flat topography, prominent viewsheds, and relatively dry conditions.

c. Project Design Features

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

d. Analysis of Project Impacts

Threshold (a): Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

(1) Impact Analysis

(a) Direct Impacts

The Project Site is currently a parking lot and there are no buildings onsite. As discussed above, there are no historical resources within the boundaries of the Project Site; therefore, no direct impacts would occur.

(b) Indirect Impacts

As discussed above, there is one identified historical resource in the vicinity of the Project Site: the granite block paving along West Bruno Street adjacent to the Project Site, between North Alameda Street and North Main Street, which has been designated as Los Angeles HCM No. 211.

The Project does not propose the removal of the pavers, which would remain unchanged in their original location following implementation of the Project. However, while the Project would not alter, relocate, or demolish the paving comprising HCM No. 211, Project construction does have the potential to result in impacts to this resource. As proposed, Project construction would include foundation work and the construction of subterranean parking along the Project Site's West Bruno Street frontage. Due to the proximity of these construction activities to HCM No. 211, vibration and settlement associated with Project construction has the potential to cause damage to the paving comprising HCM No. 211.

As is common in similar urban development sites, vibration and settlement would be controlled through adherence to design values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures, and through monitoring of associated construction activities. Although steps would be taken during construction to help ensure design values are not exceeded, if exceedance were to occur and to result in structural damage, based on industry practice and knowledge of construction activities in similar settings, such damage would likely be surficial and repairable. Nonetheless, the potential for damage to this historical resource due to construction related vibration and settlement is considered a potentially significant impact.

(c) Conclusion

As discussed above, there are no historical resources within the Project Site and no direct impacts would occur. However, vibration and settlement associated with Project construction has the potential to result in physical damage to HCM No. 211 located immediately adjacent to the Project Site within West Bruno Street. Impacts would be potentially significant prior to mitigation.

(2) Mitigation Measures

The following mitigation measure is provided with respect to historical resources (i.e., HCM No. 211):

Mitigation Measure CUL-MM-1: Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and recommendations of the Project Geotechnical Engineer and a qualified preservation consultant. The final excavation and shoring plans shall include all appropriate details, material specifications, testing, and special inspection requirements and shall be reviewed by the Project Geotechnical Engineer for conformance with the design intent and submitted to the City's Department of Building and Safety (LADBS) for review and approval during the Grading Permit submission.

The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare a Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation, grading, or shoring activities to ensure the protection of immediately adjacent historic resources from damage due to settlement during construction and excavation.

Prior to the issuance of a Grading Permit, the Applicant shall, through a qualified preservation consultant, submit to the Los Angeles Office of Historic Resources (OHR) for review and approval a Construction Monitoring Plan and excavation and shoring plans and calculations, to finalize the design-level procedures to be implemented during construction to avoid potential impacts to the granite block pavers immediately adjacent to the Project Site. OHR shall determine whether any of the following procedures must be implemented during construction based on a review of the Construction Monitoring Plan and excavation and shoring plans and calculations:

- The Project Geotechnical Engineer shall provide on-site observation during the excavation and shoring work.

- Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of the adjacent historic resource to form a baseline for determining settlement or deformation. The shored excavation and adjacent historic resource should be visually inspected each day. Survey monuments should be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results.
- In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes of the adjacent historic pavers, that work shall be performed in consultation with a qualified preservation consultant and in accordance with the Secretary of the Interiors' Standards, as appropriate. In the event that excavation, grading, or shoring activities may result in any potential damage to the adjacent historic pavers beyond only requiring touch-ups or repairs to the pavers, then the Project Applicant shall implement the following procedures for the temporary removal and reinstallation of the portion of the granite block pavers immediately adjacent to the Project Site that may be damaged:
  - All granite block pavers to be temporarily removed will be tagged by a qualified preservation consultant and their existing condition and location will be documented.
  - Granite block pavers shall be removed and reinstalled in a manner that avoids any damage to the individual pavers in accordance with the Secretary of the Interiors' Standards, as appropriate.
  - All removed granite block pavers will be safely stored by the Applicant or its designee during Project construction and reinstalled after major construction associated with the Project is completed.
  - Documentation of the tagging, removal, storage, and reinstallation of the granite block pavers shall be provided to OHR in a memorandum.

(3) Level of Significance After Mitigation

Implementation of Mitigation Measure CUL-MM-1 would reduce potential impacts to the adjacent historical resource (i.e., HCM No. 211) to the extent feasible. Specifically Mitigation Measure CUL-MM-1 requires temporary shoring, construction monitoring, and, if necessary, temporary removal, cataloging, and ultimate replacement of the historic pavers to avoid damage to this designated historic resource to the extent feasible. However, as

discussed in Section IV.I, Noise, of this Draft EIR, while construction logistics have been designed to work around the resource to the extent feasible, on-site construction vibration would exceed the significance criterion for the historic resource and no additional feasible mitigation has been identified. As discussed therein, in order for vibration levels to be reduced to a less than significant level, a 20-foot setback from the historic resource would be required. This is infeasible because construction would involve work up to the property line. Other mitigation measures considered to reduce vibration impacts included the installation of a wave barrier, which is typically a trench, or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from the excavation equipment. The temporary removal, storage, and reconstruction of the entire resource was also considered. This was determined to be infeasible because: (1) removal of the entire resource could result in additional damage and it unknown how many of the pavers would remain intact; (2) the subsurface conditions under the pavers are not known and as a result, secondary impacts may result; (3) this process would require the long-term closure of Bruno Street, which would disrupt adjacent businesses, pedestrian and bicycle access, and vehicle traffic, including emergency vehicle access; and (4) the additional time required to complete this process would extend construction considerably, thus extending the amount of time the surrounding community is exposed to the Project's construction impacts. Therefore, impacts with respect to historical resources would remain significant and unavoidable.

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

(1) Impact Analysis

As discussed above, one previously recorded archaeological resource (LAN-4183H) has been identified within the API. LAN-4183H was previously recorded as being entirely within the paved roadbed and unpaved shoulder of College Street, which is in a portion of the API (outside of the Project Site) where an electrical circuit may be placed underground. However, significance evaluations conducted for LAN-4183H determined that it is ineligible for federal, state, or local designation and is therefore not a historical archaeological resource for the purposes of CEQA.

The Project would require excavation to a depth of up to 17 feet. There is some possibility that discrete segments of the granite pavement or individual granite paving stones associated with LAN-4183H could be encountered as buried deposits within the API during Project construction, these segments are highly unlikely to change the significance of the

resource given the overall loss of integrity and lack of historical association cited in the previous evaluations. Nonetheless, if present, any such segments of the granite pavers from LAN-4183H that are recovered during ground-disturbing activities for the Project would be evaluated for significance to confirm LAN-4183H's eligibility for listing on the California Register.

As discussed above, a segment of Zanja No. 6-1 is mapped as intersecting a segment of the API (outside of the Project Site) where an electrical circuit may be placed underground. However, as discussed above, SWCA identified substantial evidence indicating that the original zanja was likely destroyed and replaced with a concrete conduit in a slightly different location after the zanja system had otherwise been abandoned. Further, evidence identified by SWCA through historical research indicates the original channel was an open earthen ditch; therefore, physical traces would only be detectable as channel deposits identified in the sediment profiles below-ground. Since channel deposits would have likely been destroyed by past development activities within the expanded street grid, the presence of any physical remains from the abandoned zanja within the API is very unlikely and the sensitivity is considered low. Nevertheless, although unlikely, the potential to encounter physical traces of Zanja No. 6-1 cannot be fully ruled out. In addition, the sensitivity analysis conducted for the Project Site determined that the Project Site has moderate sensitivity for Native American archaeological resources and high sensitivity for historical archaeological resources associated with early twentieth century industrial land uses. Some types of resources that could be encountered during ground disturbance include, but are not limited to, trash deposits, railroad tracks, road segments, sidewalk segments, structural remains, and Native American artifacts. **Therefore, in the event of an inadvertent discovery of previously unidentified archaeological resources, impacts would be potentially significant.**

(2) Mitigation Measures

The following mitigation measure is provided with respect to archaeological resources.

Mitigation Measure CUL-MM-2: Prior to issuance of any demolition or grading permits, the Applicant shall retain a Qualified Archeologist. A Qualified Archeologist is defined as one who meets the Secretary of the Interior's Professional Qualifications Standards for Archeology and the Society for California Archaeology's qualifications for a principal investigator. Ground-disturbing activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, auguring, backfilling, blasting, stripping topsoil, or a similar activity in the Project's area of potential impact (API). The API is defined as the Project Site plus the areas outside the Project Site that may be required for utility trenching.

Prior to the commencement of ground-disturbing repair activities associated with the Project within the API, at the Project kickoff, the Qualified Archeologist shall provide a briefing to construction crews to provide information on regulatory requirements for the protection of archaeological resources. As part of this training, construction crews shall be briefed on proper procedures to follow should unanticipated discoveries of archaeological resources be made during construction. Workers shall be provided contact information and protocols to follow in the event these discoveries are made. Additionally, workers shall be shown examples of the types of resources that would require notification. The training shall include a summary of the applicable regulations and penalties for non-compliance. A copy of the training materials and a list of attendees shall be provided to the Department of City Planning no more than 10 days after completing the training.

Prior to any demolition or grading permit issuance, an archaeological resources management plan (ARMP) shall be prepared and submitted to the City. The ARMP shall include, but not be limited to, monitoring protocol for ground-disturbing activities, a worker training program, and discovery and processing protocol for inadvertent discoveries of cultural resources. The ARMP shall identify areas with moderate to high sensitivity determined for cultural resources that require monitoring and detail a protocol for determining circumstances in which additional or reduced levels of monitoring (e.g., spot checking) may be appropriate. Specifically, the ARMP shall include a framework for assessing the geoarchaeological setting to determine whether undisturbed sediments capable of preserving archaeological remains are present adjacent to or beneath those sediments disturbed by agricultural and urban development, as well as the depth at which these undisturbed sediments would no longer be capable of containing archaeological material.

Monitoring shall occur during ground disturbance for the Project, including excavation within artificial fill, and shall be directed and supervised by the Qualified Archeologist. The monitor shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially significant archaeological resources, as determined by the qualified archaeologist. The monitor shall complete a daily log documenting construction activities and observations.

In the event that potentially significant archaeological resources are exposed during construction, work in the immediate vicinity of the find (within 25 feet) shall stop until the Qualified Archaeologist can evaluate the significance of the find. Construction activities may continue in other areas in coordination with the Qualified Archeologist. If the discovery is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code (PRC) 21083.2(g), and the treatments proposed in the ARMP are found to be

infeasible or other alternatives are proposed, the Qualified Archeologist shall coordinate with the Applicant and Department of City Planning to amend the ARMP with a formal treatment plan that would reduce impacts to the resource(s). The treatment plan established for the resource(s) shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment if feasible, and if it is determined avoidance is not feasible, treatment may include architectural documentation and archaeological data recovery (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant.

After archaeological monitoring is completed, the Qualified Archeologist shall prepare a technical report documenting the methods and results of all work completed under the ARMP, including, if any, treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register. If archaeological materials are identified and collected for laboratory analysis, once the analysis is complete, any recovered archaeological materials shall be curated at a public, non-profit research institution that will ensure their long-term preservation and allow access to interested scholars. Should no such institutions accept the materials, they shall be donated to an educational institution or historical society. The format and content of the report shall follow the California Office of Historic Preservation's *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*. Any archaeological resources identified shall be documented on appropriate California Department of Parks and Recreation 523-Series Forms. The report shall be prepared under the supervision of a Qualified Archeologist and submitted to the Department of City Planning. The timing and content of the final report shall consider the quantity of archaeological materials, level of analysis required, and documentation needed to establish the significance of any identified resources. The final draft of the report shall be submitted to the South Central Coastal Information Center.

(3) Level of Significance After Mitigation

Implementation of Mitigation Measure CUL-MM-2 would reduce potential impacts to archaeological resources to a less than significant level. Specifically, Mitigation Measure CUL-MM-2 requires the retention of a Qualified Archeologist to brief construction crews prior to ground-disturbing activities, the preparation of an ARMP addressing monitoring protocols, monitor certain ground-disturbing activities, and, if necessary, the preparation of a treatment plan for any encountered archaeological resources.

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

As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project Site is located within an urbanized area and has been subject to previous ground disturbance. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation up to 17 feet below ground surface, trenching within the public right-of-way for utility connections, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains are discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other applicable entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5l, which require that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. **Therefore, with compliance regulatory requirements, the Project would not disturb any human remains. As such, impacts would be less than significant and no further analysis is required.**

e. Cumulative Impacts

(1) Impact Analysis

(a) Historical Resources

As provided in Section III, Environmental Setting, of this Draft EIR, there are 21 related projects in the Project Site vicinity. The related projects comprise a variety of uses, including, but not limited to, apartments, condominiums, restaurants, hotels, office, industrial, and retail uses, as well as mixed-use developments incorporating some or all of these elements.

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

analyses and would be required to comply with applicable regulatory standards and, if required, implement mitigation measures.

As discussed above, there are no historical resources located on the Project Site; therefore the Project would not result in direct impacts to historic resources. However, Los Angeles HCM No. 211 (Granite Block Paving) is located immediately adjacent to the Project Site. As discussed above, with the implementation of Mitigation Measure CUL-MM-1, the Project would not result in indirect impacts to historical resources located adjacent to the Project Site.

Potential impacts to HCM No. 211 were analyzed for the LA Aerial Rapid Transit Project (Related Project #21) in 2021 and updated in 2022.[33] The analysis found that there is no potential for direct impacts to HCM No. 211 due to the physical separation of the components of Related Project #21 from HCM No. 211 and that any indirect impacts to would be less than significant.

Therefore, with implementation of Mitigation Measure CUL-MM-1, the Project's impact on historical resources would not be cumulatively considerable, and the cumulative impact would be less than significant

(b) Archaeological Resources

With regard to potential cumulative impacts related to archaeological resources, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources are uncovered, similar to the Project, each related project would be required to comply with applicable regulatory requirements, the City's standard condition of approval, or site-specific mitigation as with the Project. As discussed above, with the implementation of Mitigation Measure CUL-MM-2, the Project would not result in impacts to archaeological resources in the event of an inadvertent discovery. **Therefore, with implementation of Mitigation Measure CUL-MM-2, the Project's impact on archaeological resources would not be cumulatively considerable, and the cumulative impact would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to cultural resources would be less than significant with the implementation of Mitigation Measures CUM-MM-1 and CUL-MM-2.

[33] *Metro, Aerial Rapid Transit, www.metro.net/projects/aerial-rapid-transit/, accessed July 9, 2025.*

(3) Level of Significance After Mitigation

Cumulative impacts with regard to cultural resources would be less than significant with mitigation.