

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Project. Historical Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section is based on information provided in Appendix C and D of this Draft EIR, which includes a *Historic Resources Technical Report* (Historic Resources Technical Report), prepared by GPA Consulting (March 2026) (Appendix C) and Appendix D which includes an *Archaeological Resources Assessment for the 3822 South Figueroa Project in the City of Los Angeles* (Archaeological Resources Assessment), prepared by Kimley-Horn and Associates (March 2026).

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
- Federal Native American Graves Protection and Repatriation Act
- Federal Archaeological Resources Protection Act
- Federal Archaeological Data Preservation Act
- California Environmental Quality Act
- California Register of Historical Resources
- California Health and Safety Code
- California Public Resources Code
- City of Los Angeles General Plan
- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)

- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3)
- City of Los Angeles Historic Resources Survey
- Exposition/University Park Redevelopment Plan
- Flower Drive Historic District

(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 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

¹ 36 Code of Federal Regulations (CFR) 60.

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

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

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

- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁵

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

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

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

(i) Criteria

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

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- 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 historical context. Historic contexts are “those patterns, themes, or trends in history by which a specific ... property or site is understood and its meaning ... is made clear.”⁷ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

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

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

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

(iii) Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity to be eligible for listing as a resource, which is defined as “the ability of a property to convey its significance.”⁸ The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than state or local registers.

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

(iv) Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.⁹ Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.¹⁰ The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

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

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

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

- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

(b) Secretary of the Interior's Standards for the Treatment of Historic Properties

The National Park Service issued the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) with accompanying guidelines for four types of treatments for historic resources: preservation, rehabilitation, restoration, and reconstruction.¹¹ The most applicable guidelines should be used when evaluating a project for compliance with the Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Standards for Rehabilitation provide relevant guidance for such projects. The Standards for Rehabilitation are as follows:

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

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

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.¹²

It is important to note that the Standards are not intended to be prescriptive but, instead, provide general guidance.¹³ They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every standard to achieve compliance.

(c) Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to return Native American cultural items to the appropriate federally recognized Indian tribes or Native Hawaiian groups with which they are associated.¹⁴

(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.¹⁵

(e) Archaeological Data Protection Act

The Archaeological Data Protection 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.

¹² United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

¹³ United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

¹⁴ United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, 1990.

¹⁵ U.S. Department of the Interior, National Park Service, Technical Brief #20: Archeological Damage Assessment: Legal Basis and Methods, 2007.

(2) State

(a) *California Environmental Quality Act*

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

CEQA Guidelines Section 15064.5 recognizes that historical resources include (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, 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 states 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.¹⁶ If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if

¹⁶ California Public Resources Code Section 21083.1(a).

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.¹⁷

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”¹⁸ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

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

In general, a project that complies with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.¹⁹

(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.”²⁰ 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.²¹ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

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

¹⁷ State CEQA Guidelines Section 15064.5(c)(4).

¹⁸ State CEQA Guidelines Section 15064.5(b)(1).

¹⁹ State CEQA Guidelines Section 15064.5(b)(3).

²⁰ California Public Resources Code Section 5024.1[a].

²¹ California Public Resources Code Section 5024.1[b].

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*

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

(3) Local

(a) *City of Los Angeles General Plan*

(i) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.²²

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) *South Los Angeles Community Plan*

The Land Use Element of the City's General Plan includes 34 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

²² City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5.

circulation and service systems. The community plans implement the City's General Plan Framework Element 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.

Applicable policies and goals related to historic and cultural resources within the South Los Angeles Community Plan are listed below:

- **Goal LU8:** High quality, context-sensitive design that is reflective of the desired community character, and preserves the historic and cultural character of the district.
- **Goal LU12:** Strong and competitive community commercial areas that serve the needs of the surrounding community while preserving historic commercial and cultural character.
- **Goal LU23:** South Los Angeles' significant cultural and historical resources are protected, preserved and/or enhanced.
 - **Policy LU23.1 Protect Historic Resources.** Continue to identify and protect designated City of Los Angeles Historic-Cultural Monuments..
- **Goal LU24:** Applicable preservation criteria are considered when reviewing projects affecting designated and eligible historic resources.
 - **Policy LU24.1 Historic Preservation Standards.** Apply the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer, 1995) to all projects that affect designated historic resources.
 - **Policy LU24.2 CEQA Review of Eligible Resources.** Discretionary project proposals affecting resources identified through the Los Angeles Historic Resources Survey (SurveyLA) as eligible for historic designation should undergo thorough review pursuant to the California Environmental Quality Act (CEQA).
 - **Policy LU24.3 Evaluate Potential Significance.** Consult with the Office of Historic Resources regarding projects that require environmental review in order to adequately evaluate the potential significance of buildings 45 years of age or more.
- **Goal LU27:** Preserve existing cultural resources to enhance the cultural identity of the community.
 - **Policy LU27.2 Enhance Cultural Resources.** Protect and enhance places and features identified within the Community Plan Area as cultural resources for the City of Los Angeles.

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

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

- 1) The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified;
- 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.²³

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and the Department of City Planning's Office of Historic Resources (OHR) staff often ask the following questions:

- 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?²⁴

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

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

²⁴ 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 January 6, 2026.

seven aspects of integrity from the National and California Registers are applied similarly by the City and the threshold of integrity for individual eligibility is also applied in a similar manner. 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.”²⁵

(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. Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.²⁶ 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.²⁷ 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.

²⁵ City of Los Angeles, Los Angeles Municipal Code Section 91.106.4.5.1.

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

²⁷ City of Los Angeles, Los Angeles Municipal Code Section 12.20.3.

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

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

The Los Angeles Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used eligibility standards to identify the character defining, associative features, and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These eligibility standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the eligibility standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register, or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Register are separate processes that include property owner notification and public hearings.

(e) *Community Redevelopment Agency of Los Angeles
(CRA/LA) Exposition/University Park Redevelopment Plan*

The Community Redevelopment Agency of the City of Los Angeles (CRA) was established in 1948 to revitalize economically underserved areas within the City of Los Angeles by increasing the supply of low income housing, providing infrastructure for commercial and industrial development, and creating employment opportunities. To carry out these goals, CRA adopted

comprehensive plans for each Redevelopment Project Area. The CRA was dissolved in February 2012, and administration of the Redevelopment Project Areas was initially transferred to the CRA/LA, a Designated Local Authority and successor to the CRA. On September 30, 2019, the Los Angeles City Council voted to adopt Ordinance No. 186,325 to effectuate the transfer of land use related plans and functions of the CRA/LA to the City of Los Angeles. As a result, the Department of City Planning has jurisdiction over review of properties located within Redevelopment Project Areas as of November 11, 2019.

Some Redevelopment Project Areas also include a historical resources survey that documents all of the historical resources--individual and districts--within the Redevelopment Project Area. These CRA and CRA/LA surveys were done independent of the City's SurveyLA effort, though some of the more recent surveys may have used the same methodology and technology that was used in SurveyLA. SurveyLA did not survey areas already surveyed by CRA or CRA/LA. Currently, there are 32 Redevelopment Project Areas throughout Los Angeles.

The Project Site is located within the boundaries of the Exposition/University Park Redevelopment Plan, within an area designated as Commercial. According to the Redevelopment Plan, areas designated on the Redevelopment Plan's map as Commercial shall permit uses and services which shall (a) conform with the goals and objectives of the Redevelopment Plan; (b) be regionally and or community oriented, and include but not limited to office, retail, and services uses, such as laundry/cleaners, medical/legal/accounting/professional/general business offices, banks, theaters, hotels, motels, and limited ancillary manufacturing, churches, schools, and ancillary parking and parking structures; (c) be compatible with adjacent uses, the surrounding neighborhood and the community; and (d) promote community revitalization, economic improvement and aesthetic and environmental improvements. The Project is a mixed-use development consisting of residential and commercial uses.

(f) Flower Drive Historic District

The Flower Drive Historic District was identified and evaluated as part of the Historic Resources Survey Update for the Exposition Park/University Park Redevelopment Area in Los Angeles. It was later determined eligible for listing in the California Register by the State Historical Resources Commission (SHRC) in 2008. It includes the block of Figueroa Street between West 38th Street and West 39th Street; however, the Flower Drive Historic District evaluation concluded that the properties fronting South Figueroa Street did not retain enough integrity to be part of the Flower Drive Historic District, and a separate district along Figueroa Street was not identified as part of the survey.

b. Existing Conditions and Setting

The Project Site is generally bounded by South Figueroa Street to the west, West 38th Street to the north, South Flower Drive and Interstate 110 (I-110) freeway to the east, and existing residential uses and an auto servicing center to the south. The Project Site is currently developed with seven, two-story multi-family residential buildings that are part of the Flower Drive Historic District along Flower Drive, and a two-story multi-family residential building and surface parking along Figueroa Street.

The Project Site is located in the Los Angeles Basin in the northwestern portion of the Peninsular Ranges Geomorphic Province. The Peninsular Ranges province extends approximately 900 miles southward from the Santa Monica Mountains to the tip of Baja California and is characterized by elongated, northwest-trending mountain ridges and sediment-floored valleys. The province includes numerous northwest-trending fault zones, most of which either gradually truncate, merge with, or are terminated by faults that form the southern margin of the Transverse Ranges province.²⁸ In the present day, the Project Site is underlain by artificial fill, young fluvial deposits, and old alluvium, according to the geotechnical study prepared for the proposed Project. Geologic maps also indicated the presence of young alluvium sediments (Qa) across the entire Project Site made up of clay, sand, and gravel, and includes the gravel and sand of minor stream channels.

(1) Ethnographic Setting

The Project Site is located within the ancestral territory of the Gabrieleño/Tongva. Although territories of southern California tribes were recorded in 1925, the ancient territorial borders remain inexact for two reasons: first, territorial boundaries were flexible and, secondly, indigenous borders and land use were not recorded until after European settlements displaced many Native American communities. Although firm and defining borders cannot be known, archaeological, ethnographic, and historic evidence exists to support the conclusion that the Project Site is located within a large geographic area inhabited by the Gabrieleño/Tongva, also known as the First Peoples of Los Angeles.

The Gabrieleño/Tongva have a rich and diverse material culture, traditionally including shell set in asphaltum, carvings, painting, baskets, an extensive steatite industry, and a wide range of stone, shell, and bone materials. At the time of European colonization, they inhabited numerous permanent villages in fertile lowlands along waterways in sheltered areas along the coast, each of which held a population in the low hundreds. Smaller villages were also located at varying distances from these permanent villages, all of which were highly connected via economic, religious, and social ties. Villages contained circular and domed homes made of tule mats, fern, or carrizo, as well as small, circular earth-covered sweathouses. Their hunting and gathering subsistence strategy included land and offshore efforts that resulted in the take of both small and large land animals, sea mammals, river and ocean fish, and a variety of plant resources. The population sometimes migrated between villages on a temporary basis throughout the year, returning to their permanent villages for ceremony or when resources needed to be replenished. Records show that the long history of European colonization and harmful displacement of Native Americans initially began in 1542 as a result of Juan Rodríguez Cabrillo visiting the area during exploration. Following many subsequent Spanish visits to the region, the colonization of the indigenous population continued in 1769 around the same time as the establishment of San Gabriel Mission and the San Fernando Mission in 1771 and 1797, respectively. Due in part to the introduction of new diseases, as well as the harsh conditions of mission life, the indigenous population quickly dwindled and cultural practices were lost. Following the secularization of the missions, most surviving Gabrieleño/Tongva became wage laborers on the ranchos of Mexican

²⁸ Revised Limited Geotechnical Exploration - 3801 to 3855 Flower Drive and 3822 to 3830 South Figueroa Street, City Of Los Angeles, California (Geotechnical Report) prepared for the Project by Leighton and Associates, Inc., dated March 8, 2023, revised June 4, 2024.

California and were later nearly completely wiped out as a result of a smallpox outbreak in the 1860s.

(2) Local History

The Project Site is located in the Exposition Park/University Park area of the South Los Angeles Community Plan area (Community Plan). The early development of this area of the Community Plan was shaped by the establishment of railroad and streetcar lines as well as the University of Southern California (USC). In the late nineteenth century, University Park emerged as an early and affluent suburb of Downtown Los Angeles. In the following decades, development in the University Park neighborhood was influenced by USC, including postwar campus expansion and conversion of a number of early residential buildings for university use.

This early suburbanization followed a typical pattern of development, with neighborhood commercial uses emerging along major thoroughfares, single-family residential neighborhoods along smaller streets, and multifamily buildings dispersed throughout. Institutional resources such as schools and religious buildings were established as the communities grew, and industrial uses were concentrated around railroad lines.

During the 1920s, Los Angeles experienced a population boom that created a dramatic increase in housing demand, particularly in the areas surrounding Downtown. While single-family residences had been the dominant and preferred housing type for decades, housing density inevitably had to increase to accommodate the influx of new residents. Multi-family housing was also seen as a lucrative investment opportunity, with duplexes and fourplexes among the most popular and profitable property types to construct. Multi-family buildings were constructed as infill development, but entire multi-family neighborhoods also emerged in previously underdeveloped areas like the Figueroa Street corridor.

(3) Historical Resources in the Project Vicinity

The Impact Area for evaluation in the Historic Resources Technical Report was established as a 250-foot radius surrounding the Project Site. As depicted in **Figure IV.B-1, Historical Resources Within the Project Site and Impact Area**, the Impact Area encompasses the city block on which the Project is located and overlaps with portions of the surrounding historical resources on adjacent parcels. The Impact Area only includes a small portion of the large parcel west of the Project Site that includes the Los Angeles Memorial Coliseum and BMO Stadium. While the Los Angeles Memorial Coliseum is a historical resource listed in the National Register and California Register, it is physically and visually separated from the Project Site by South Figueroa Street and a setback of over 800 feet.

The Historic Resources Technical Report analyzes the Project's potential impacts on all other historical resources that intersect with the Impact Area, even if they are only partially located within the 250-foot radius. The Impact Area also does not extend past the I-110 Freeway, which creates a physical and visual separation between the Project Site and any historical resources east of the freeway. Previously identified historical resources within the Impact Area include the Zobelein Estate/Zobelein Courtyard Apartments and the California African American Museum (CAAM) which are described below.

(a) *Zobelein Courtyard Apartments/Zobelein Estate*

The Zobelein Courtyard Apartments/Zobelein Estate property is located on the east side of South Flower Drive between West 38th Street and West 37th Street. The property is located on land that was historically owned by George Zobelein, a German immigrant and prominent early citizen of Los Angeles who owned and operated the Los Angeles Brewing Company. The Zobelein Estate was determined eligible for listing in the National Register and was listed in the California Register in 1990. In 1993, the same property was designated a Historic Cultural Monument (HCM) by the City of Los Angeles. Therefore, the Zobelein Courtyard Apartments/Zobelein Estate was evaluated as a historical resource in the Historic Resources Technical Report.

(b) *California African American Museum (CAAM)*

The CAAM is located at 600 West State Drive and was identified as a potentially eligible historical resource during the development of the African American History Context for the Los Angeles Citywide Historic Context Statement (LACHCS).^{29,30} While the CAAM has not been formally evaluated as a historical resource, it appears to meet the eligibility standards and integrity considerations established in the LACHCS for properties associated with the history of African American visual arts. As such, CAAM was evaluated as a historical resource within the Historic Resources Technical Report.

(c) *Flower Drive Historic District*

Seven parcels on the Project Site along South Flower Drive are within the Flower Drive Historic District; see **Figure IV.B-1, Historical Resources Within the Project Site and Impact Area**. The Flower Drive Historic District was identified and evaluated as part of the Historic Resources Survey Update for the Exposition Park/University Park Redevelopment Area in Los Angeles.

The Flower Drive Historic District is described as follows on a 2007 Primary Record and District Record:

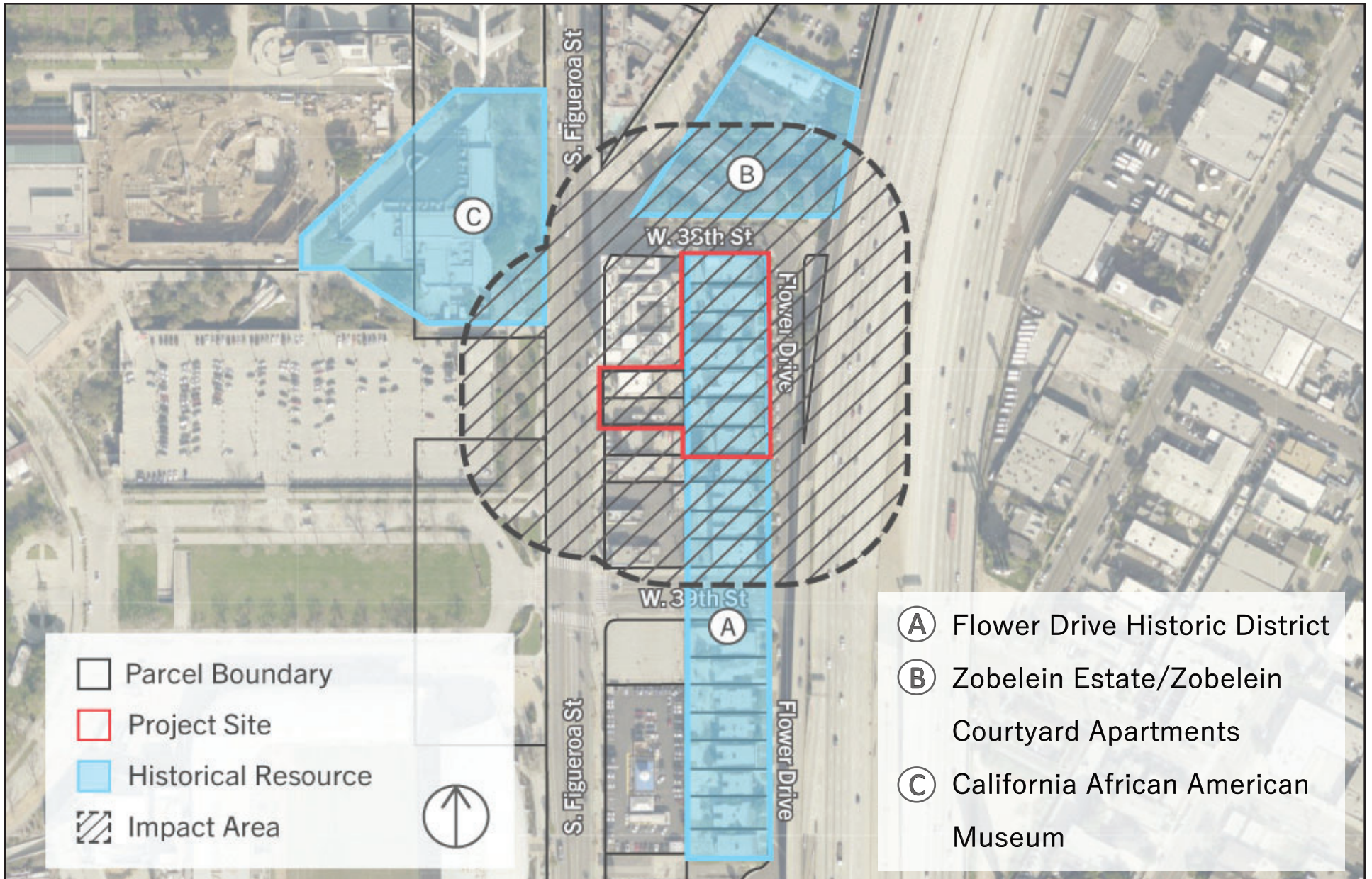
The Flower Drive District consists of 19 multi-family dwellings constructed on the west side of the 3800 and 3900 blocks of Flower Drive primarily between 1920 and 1927. The District includes 19 properties, 17 of which contribute to its significance. All of the contributing properties are two-story, multi-family dwellings that are rectangular in plan on 50-foot by 140-foot parcels with uniform setbacks... The two non-contributors within the district's boundaries are a two-story vernacular Modern fourplex erected in 1939 that is outside the period of significance, and a two-story fourplex originally constructed in 1921 that has been stripped to its wooden framework and rebuilt. The Flower Drive District's boundaries contain a geographically isolated grouping of multi-family residences erected in the 1920s that embody the response to growing population pressures in the University District

²⁹ The Los Angeles Citywide Historic Context Statement provides the framework for identifying and evaluating the City's historic resources. The document, created as part of SurveyLA, identifies important themes in the City's history and development.

³⁰ City of Los Angeles, Historic Context Statement, <https://planning.lacity.gov/preservation-design/historic-resources/historic-themes>, accessed January 6, 2026.

during that time period. The district's contributors are unified by property type, common lot size, setbacks, height, spatial arrangement, form and architectural style. The district retains a high degree of overall integrity.

The Flower Drive Historic District was determined eligible for listing in the California Register by the State Historical Resources Commission in 2008; therefore, it is considered a historical resource for the purposes of CEQA.



SOURCE: GPA Consulting, 2024



FIGURE IV.B-1: Historical Resources Within the Project Site and Impact Area

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(4) Archaeological Resources

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

Archaeologists have developed the cultural frameworks in southern California by generally relying on relative dating methods using diagnostic artifacts, as opposed to absolute dating, due to a general lack of chronometric data available in the regional archaeological record. The framework proposed by Wallace introduced the Early Period, Millingstone Period, Intermediate Period, and Late Prehistoric Period, which generally follows the geologic time scale of Early, Middle and Late Holocene.

Early Holocene (10,000-7500 calibrated years Before Present (cal BP))

A gradual warming of the environment occurred during the Early Holocene. Researchers have proposed that groups from the Early Holocene were highly mobile and traveled across wide ranges. Cultural resources were portable or expedient to accommodate mobility. Archaeologists have recorded artifacts associated with hunting and plant processing at early Holocene sites, such as projectile points, bifaces, and groundstone tools.

Middle Holocene (7500-3500 cal BP)

The Millingstone Period during the Middle Holocene is characterized by new artifact types. The warming of the environment resulted in adaptations to changing environments and associated plant and animal resources. Temporary and seasonal camps were utilized during the Middle Holocene. Tools were intentionally cached, which indicate an intent to return to specific sites over time. Diagnostic artifacts have been recorded at Middle Holocene sites, such as Pinto and Silver Lake projectile points.

Late Holocene (3500 cal BP through Historic Contact)

Archaeological sites from the Late Holocene contain increasingly diverse artifact assemblages. Increased population is evident and multiple family groups likely co-existed within the communities. Proximity to water was an important factor for the seasonal and permanent settlements. Late Prehistoric archaeological sites contained diverse artifact assemblages, including projectile points, ceramics, pendants, incised stones, and shell beads. An increase in hunting efficiency occurred during the Late Prehistoric Period and Protohistoric Period, which is evident by the bow and arrow technology. An abundance of mortars and pestles have been recorded at village sites and further indicate a transition towards sedentary habitation.

(a) *Previously Conducted Studies*

As provided in the Archaeological Resources Assessment, a records search at the South Central Coastal Information Center (SCCIC) was conducted on June 27, 2024 to identify any previously recorded archaeological resources or previously conducted cultural resources studies within the record search area, which was defined as the Project Site plus a 0.5 mile buffer. The

results of the records search noted that 26 cultural resources studies have been conducted and 44 cultural resources have been recorded within the record search area. However, no cultural studies have taken place and no cultural resources have been recorded on the Project Site. Of the 44 cultural resources located in the record search area, only one resource, P-19-004191, is associated with an archaeological site. P-19-004191 is a historic-period refuse scatter associated with pharmacies, construction materials suppliers, and bottling plants that was recorded in the northwest portion of the record search area 0.4 miles from the Project Site. P-19-004191 was discovered during construction monitoring at the Natural History Museum of Los Angeles and predates the museum's construction in 1913. The resource has not been evaluated for eligibility in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) and therefore no information is available on the eligibility of the resource. The remaining resources consist of historic built environment resources and, as such, no prehistoric resources have been recorded within the Project Site or within the 0.5-mile buffer.

A review of available geologic maps and reports was conducted for the Project Site. Geologic maps illustrated that the Project Site is underlain by artificial fill, young fluvial deposits, and old alluvium, according to the geotechnical study prepared for the proposed Project. The Project Site is also underlain by young alluvium (Qa) of the Holocene era made up of clay, sand, and gravel and includes the gravel and sand of minor stream channels. Holocene-aged young fluvial native soils are present at the Project Site from four to 25 feet below ground surface and were deposited by the prehistoric ancestral course of the Los Angeles River, according to the geotechnical investigation. Human occupation took place in the Holocene era. As such, young alluvial and fluvial geologic units typically have a moderate potential for archaeological resources, such as the layer of young deposits ranging approximately four to 25 feet below the surface within the Project Site. The proposed depth of excavation for the Project is a maximum of 10 feet below ground surface. The presence of fluvial sediments associated with the historic river increases the archaeological sensitivity of the Project Site, because proximity to water was an important consideration for prehistoric habitation.

A review of historic maps and aerial imagery was also conducted for the Project Site. Early topographic maps and images show that development occurred in the Project Site as early as the 1920s. However, historic maps indicate that the immediate vicinity has been developed since at least the 1890s. A review of historic Sanborn Fire Insurance maps for the Project area show the vicinity of the Project area was developed by 1894. By 1907, multiple buildings had been constructed within the Project area. Historic aerial images indicate that minimal development has occurred at the Project Site after the 1940s. As a result of this review, it is clear that the Project Site has been subjected to early development in the late 1800s and early 1900s with few changes occurring in recent decades.

(b) Sacred Lands File Search

A Sacred Lands File (SLF) search request was submitted to the Native American Heritage Commission (NAHC) to identify any documented sacred lands on or near the Project Site. The NAHC responded on July 9, 2024 and noted that the results were negative for the presence of any known resources. The NAHC also provided a contact list of Native American Tribes who may have additional knowledge of sacred sites in the vicinity.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

For this analysis the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and consideration identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to archaeological resources:

- If the Project would 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 old³¹ and possesses substantial stratigraphic integrity; or
 - Involves important research questions that historical research has shown can be answered only with archaeological methods.

b. Methodology

The Historic Resources Technical Report is based in part, on a review of various materials including the Built Environment Resources Directory (BERD) maintained by the State Office of Historic Preservation (OHP), the Los Angeles Historic Resources Inventory website, building permit records, city directories, historic aerial photographs, prior survey data, Sanborn Fire Insurance maps, local history databases, and various newspaper archives. A field survey of the

³¹ 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.

Project Site and Impact Area was also conducted to assess the condition and physical integrity of the buildings.

The evaluation of the Project's potential impacts to archaeological resources is based on the Archaeological Resources Assessment. As detailed in the Archaeological Resources Assessment, a literature review and records search were conducted for the property to identify the likelihood of present archaeological resources for which the Project may cause a substantial adverse change. Due to the existing built environment and resultant inability to survey for archaeological resources, the assessment did not include any onsite archaeological fieldwork. Tasks included a Sacred Lands File search through the NAHC, a cultural records search through the South Central Coastal Information Center (SCCIC) to identify any studies conducted and/or resources recorded within or adjacent to the Project Site, and a review of geological and historical maps and imagery to identify the archaeological sensitivity of the Project Site.

c. Project Design Features

The following Project design features (PDFs) are proposed with regards to archaeological resources:

Project Design Feature CUL-PDF-1: Prior to initiating ground-disturbing activities, the Project applicant shall retain a qualified professional archaeologist meeting Secretary of the Interior professional qualifications (Project Archaeologist). Archaeological Resources Training shall be provided to all construction managers and construction personnel engaged in relevant job activities prior to commencing any ground disturbance work within the Project Site. The training shall be prepared and conducted by a qualified professional archaeologist meeting Secretary of the Interior professional qualifications. The training content shall include, but not be limited to, information about archaeological resources in the vicinity, types of common archaeological resources in southern California, and the procedures to be followed to protect any such resources in the case of inadvertent discovery. The training may be discontinued when ground disturbance activities for the Project are completed. Construction personnel shall not be permitted to operate equipment within the construction area during the relevant construction period unless they have attended the training. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the training shall be maintained by the Project.

Project Design Feature CUL-PDF-2: The Project Archaeologist shall monitor, or supervise archaeological monitors (Monitors), for as needed and intermittent archaeological monitoring during ground disturbing activities. Archaeological monitoring will begin once excavation reaches the bottom of the artificial fill layer, which is approximately four feet below ground surface. After initiation, intermittent archaeological monitoring shall occur for a minimum of 20 hours per week. The Project Archaeologist shall have the ability to recommend monitoring be decreased or eliminated after the first two weeks of spot monitoring during ground-disturbing activities below four feet are complete. The recommendation shall be based on the absence of cultural resources and/or indication of subsurface soils possessing a low likelihood for significant intact resources. In the event that archaeological resources are inadvertently unearthed or encountered during excavation and

grading activities, the Project Archaeologist/Monitors may request that construction halt within 50 feet of the find and the Project Archaeologist shall record and assess the resource. Actions recommended by the Project Archaeologist to manage the discovery, such as avoidance or excavation of the find, shall be adhered to and documented within the resource record.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Direct Impacts

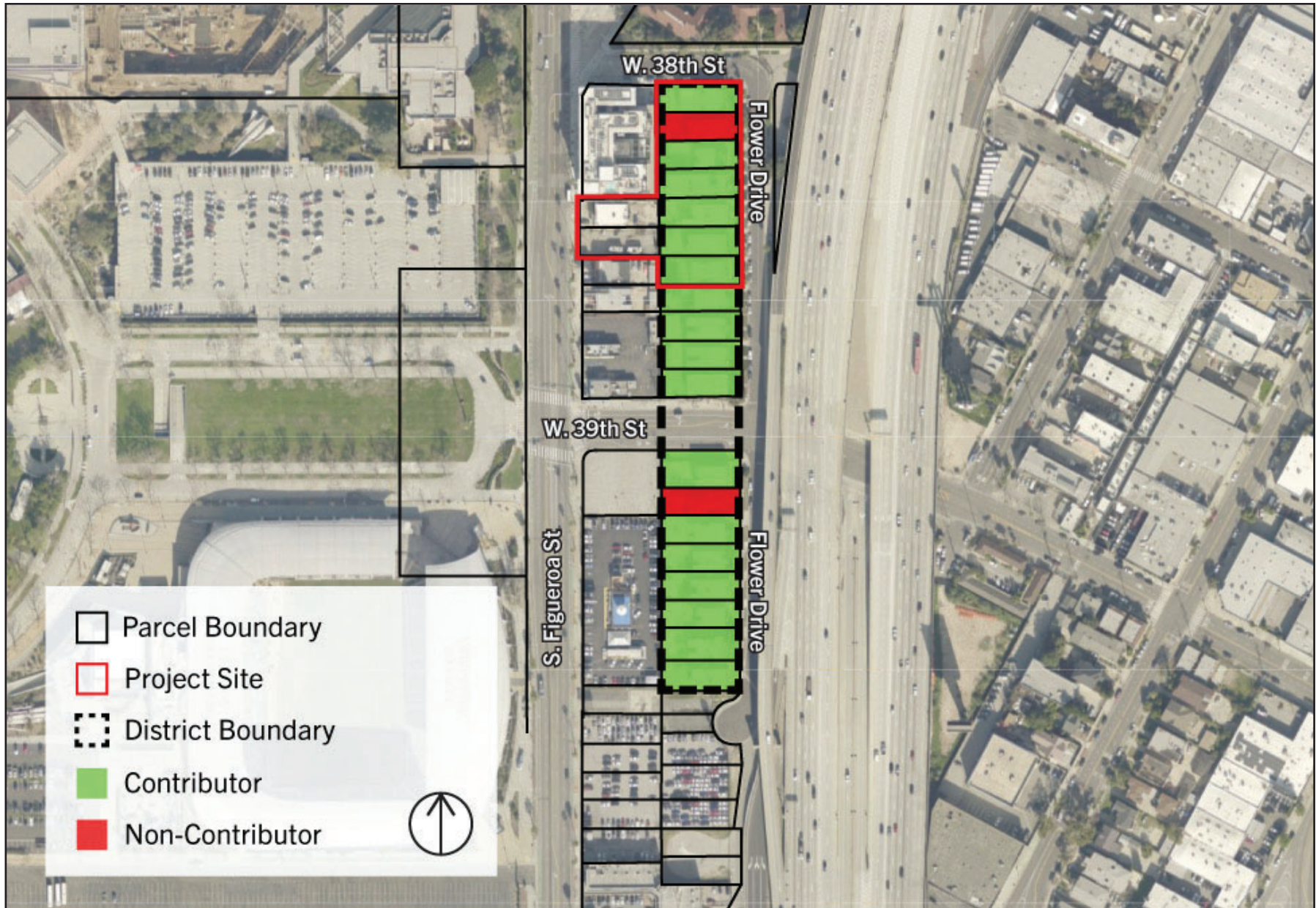
(i) Flower Drive Historic District

As previously discussed, the Project would include the demolition of contributing resources within the boundaries of the Flower Drive Historic District, which is eligible for the California Register and considered a historical resource under CEQA.

The SHRC determined that the Flower Drive Historic District consisted of seventeen contributors (ten on the 3800 block of South Flower Drive and seven on the 3900 block of South Flower Drive). There was one non-contributor each on the 3800 and 3900 blocks of South Flower Drive. In its existing condition at the time of the initial determination of eligibility in 2008, the Flower Drive Historic District was determined to retain integrity of location, design, materials, workmanship, feeling, and association.

Seven buildings on the Project Site are at the north end of the Flower Drive Historic District and would be demolished as part of the proposed Project. Six of the buildings proposed for demolition are contributing and one is non-contributing; see **Figure IV.B-2, Contributing and Non-Contributing Resources Within the Flower Drive Historic District**.

The contributing resources within the Flower Drive Historic District proposed to be demolished are considered historical resources in and of themselves and contain character defining features that make the district eligible for listing. Therefore, the direct impact caused by the Project would be significant, regardless of whether the remaining contributors remain eligible for listing. **Therefore, the Project would cause a potentially significant direct impact to the Flower Drive Historic District.**



SOURCE: GPA Consulting, 2024



FIGURE IV.B-2 Contributing and Non-contributing Resources Within the Flower Drive Historic District

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(ii) Zobelein Estate/Zobelein Courtyard Apartments

The Project Site does not include any proposed physical changes to the Zobelein Courtyard Apartments/Zobelein Estate. **Therefore, there would be no direct impact to the Zobelein Courtyard Apartments/Zobelein Estate caused by the Project, and no significant direct impact would occur.**

(iii) California African American Museum

The Project Site does not include any proposed physical changes to the CAAM. **Therefore, there would be no direct impact to the Zobelein Courtyard Apartments/Zobelein Estate caused by the Project, and no significant direct impact would occur.**

*(b) Indirect Impacts**(i) Flower Drive Historic District*

The Project involves activities including demolition of historical resources and alterations to contributors to the Flower Drive Historic District, in which a significant portion of the Project is located. **Therefore, as the Project would cause a direct impact on the Flower Drive Historic District, there would not be indirect impacts on the Flower Drive Historic District.**

(ii) Zobelein Courtyard Apartments/Zobelein Estate

The Project would introduce a new building south of the Zobelein Courtyard Apartments/Zobelein Estate across West 38th Street. The introduction of a new building in the vicinity of the historical resource would not demolish or negatively impact any of the resource's defining features or diminish its significance. The integrity of immediate setting, consisting of the landscaping on the property as well as the interrelationship between buildings, would not be changed by the Project. The broader setting is not an essential aspect of integrity for the historical resource, and the Project would not affect the property's integrity of location, design, materials, workmanship, feeling, or association.

The Zobelein Courtyard Apartments/Zobelein Estate would not be materially impaired by the Project because it would retain all its character-defining features and physical characteristics that justify its inclusion in the California Register and designation as an HCM. **Therefore, the indirect impact to the Zobelein Courtyard Apartments/Zobelein Estate caused by the Project would be less than significant.**

(iii) California African American Museum

The Project would introduce a new building east of the CAAM across South Figueroa Boulevard. The introduction of a new building in the vicinity of the presumed historical resource would not demolish or negatively impact any of the resource's defining features or diminish its potential significance. The integrity of immediate setting, consisting of the landscaping and plaza around the museum, as well as the interrelationship between the CAAM and Exposition Park, would not be changed by the Project. The broader setting is not an essential aspect of integrity for the presumed historical resource, and the Project would not affect the property's integrity of location, design, materials, workmanship, feeling, or association.

There would be no change to the physical characteristics of the CAAM or its immediate setting and it would retain its ability to meet the Eligibility Standards established in the LACHCS for the Visual Arts theme of the African American History of Los Angeles context. **Therefore, the indirect impact to the CAAM caused by the Project would be less than significant.**

(2) Mitigation Measures

Project-level impacts to historic resources would be potentially significant. Therefore, the following mitigation measure would be implemented to address potential impacts to historic resources.

Mitigation Measure CUL-MM-1: Interpretive Display. The Applicant shall prepare an interpretive display consisting of at least one panel and install the display(s) in a location visible from the public right-of-way along South Flower Drive between West 38th Street and West 39th Street. The interpretive display shall include a brief history of the area as well as the district and its significance within the context of multi-family residential housing development. The text in the interpretive display shall be accompanied by photographs of the district and other available visual ephemera, such as historic maps and aerial images. The interpretive display shall be professionally written and designed. The written content shall be prepared by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history. Prior to fabrication and installation of the interpretive display, a digital draft shall be made available to the City of Los Angeles Office of Historic Resources staff for review and comment. The finished interpretive display shall be installed prior to the issuance of the final Certificate of Occupancy.

Mitigation Measure CUL-MM-2: Updated California Register Nomination. The Applicant shall submit an updated California Register historic district nomination for the contributing buildings remaining after construction of the project prior to the issuance of the final Certificate of Occupancy. The nomination shall be prepared in accordance with OHP instructions by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history. The photographic documentation shall be carried out only after framing and exterior finishes, at a minimum, of the proposed multi-family building are complete, in order to convey a full understanding of the changes to feeling and setting. This mitigation measure will be considered complete when the Applicant ensures the nomination is prepared and submitted to OHP for consideration.

(3) Level of Significance After Mitigation

The Project would implement **Mitigation Measures CUL-MM-1** and **CUL-MM-2** to reduce impacts. **Mitigation Measure CUL-MM-1** would require the installation of an Interpretive Display that would include a brief history of the area as well as the district and its significance within the

context of multi-family residential housing development located visible from the public right-of-way along South Flower Drive between West 38th Street and West 39th Street. **Mitigation Measure CUL-MM-2** would require the preparation of a California Register historic district nomination for the contributing buildings remaining after construction of the Project.

However, due the unique nature of the historic contributor buildings proposed for demolition by the Project, the implementation of **Mitigation Measures CUL-MM-1** and **CUL-MM-2** would not reduce direct impacts to the Flower Historic District to less than significant. Therefore, direct impacts would remain significant and unavoidable.

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

(1) Impact Analysis

As detailed in the Archaeological Resources Assessment, no archaeological resources were identified within the Project Site as a result of the records search and associated research. As such, no archaeological resources that meet the definition of “Historical Resources” or “Unique Archaeological Resources,” as defined by CEQA, have been identified within the Project Site as a result of this study. Furthermore, archaeological resources are unlikely to be present near the surface given the extent of previous development and presence of surficial artificial fill.

However, there is a low to moderate archaeological sensitivity and potential for buried or historic-period archaeological resources past the depths of added fill of four feet. The potential for prehistoric material is evidenced by the presence of an alluvial fan topography and underlying Holocene-age geological deposits, as well as known prehistoric- and historic-era occupation in this region. While the SCCIC provided minimal prehistoric archaeological data for the Project Site and record search buffer, it is important to recognize that the region was subject to development prior to requirements for archaeological study and, as such, it is not uncommon to encounter previously unrecorded prehistoric archaeological sites in the region during new ground disturbing-activities within areas of similar soil type/age and prior land uses as the Project Site. The potential for historic-era archaeological resources is similarly evidenced by known historic uses within the Project Site, which was developed as early as the 19th century with subsequent development in the 1920s that is still present on significant portions of the Project Site, which would not have been assessed at the time of construction. Additionally, the record search conducted at the SCICC revealed that a buried historic-era archaeological resource was discovered during construction monitoring at a location 0.4 miles northwest of the Project Site, adding to the low but nonetheless extant possibility that a similar resource could be identified during development of the Project Site.

Given that the Project Site was developed in the late 19th century, it is likely any surface manifestations of any prehistoric archaeological sites were disturbed. Additionally, there is no archaeological sensitivity within the upper layers made of artificial fill. However, the proposed depth of excavation for the Project is a maximum of 10 feet below ground surface, (bgs) and efforts for the proposed Project may disturb native soils with low to moderate prehistoric and historic archaeological sensitivity during construction between four to 10 feet bgs over the entire Project Site.

While there is not any specific substantial evidence of any significant impact, out of an abundance of caution, **Project Design Feature CUL-PDF-1** and **Project Design Feature CUL-PDF-2**, which outline the provision of archaeological resources training, as needed archaeological monitoring, and the process for treatment of any potential archaeological resource during Project construction, and are included as a part of the Project. If archaeological material is discovered during the course of Project development, it is likely to be in a secondary or tertiary deposit and lacking integrity to meet the threshold of significance for listing in the NRHP or CRHR, though the presence of monitors to address any inadvertent discoveries will ensure proper recordation of any present resources and on-the-ground assessment to verify the lack of eligibility of any prehistoric or historic materials that may be encountered. As such, impacts related to an archaeological resource during Project construction would be less than significant.

The Project would not cause a substantial adverse change in the significance of an archaeological resource. Therefore, impacts to archaeological resources would be less than significant.

(2) Mitigation Measures

Project-level impacts to archaeological resources would be less than significant. Therefore, no mitigation is required.

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those that have previously occurred on the Project Site, the potential exists to uncover existing but undiscovered human remains. Such inadvertent discovery is governed by existing regulatory requirements. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5 (e), which requires 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 most likely descendent. 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, due to the low potential that any human remains are located on the Project Site and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant.

Therefore, impacts in regards to disturbing human remains, including those interred outside of dedicated cemeteries, would be less than significant.

(2) Mitigation Measures

Project level impacts related to human remains would be less than significant. Therefore, no mitigation is required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or compound or increase other environmental impacts. As identified in Section III, Environmental Setting, of this Draft EIR, there are a total of seven related development projects (Related Projects) that have been identified in the general vicinity of the Project Site. The four Related Projects located within 1,000 feet of the proposed Project include Related Project 1 (California African American Museum located approximately 230 feet northwest of the Project Site), Related Project 6 (3900 South Figueroa Street approximately 350 feet to the south of the Project Site), Related Project 7 (3851 Grand Avenue approximately 440 southeast of the Project Site), and Related Project 5 (3801 South Grand Avenue approximately 488 feet to the east of the Project Site).

(a) *Historical Resources*

Impacts on historical resources tend to be site-specific. However, cumulative impacts would occur if the Project and Related Projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type as those within the Project Site. The Historic Resources Technical Report considered four Related Projects identified by the City for potential cumulative impacts

As discussed above, of the seven Related Projects, four are located within 1,000 feet of the Project Site and therefore are the focus of this cumulative impacts analysis.

- **Related Project No.1 California African American Museum Renovation Project**

The CAAM Renovation Project was identified as a related project within the Historic Resources Technical Report. It consists of a renovation and expansion of the existing museum. The lead agency for CEQA, the California Science Center, determined that the CAAM Renovation Project would not result in significant impacts to the environment. A mitigated negative declaration (MND) was prepared and the notice of determination (NOD) was filed in January 2010, which determined that the renovation project would not negatively impact the resource's eligibility for listing as a historical resource. Therefore, the Project in combination with Related Project No. 1 would not have the potential to result in a cumulatively considerable impact to the historic setting of any historical resources and cumulative impacts would be less than significant.

- **Related Project No.6 3900 South Figueroa Street Mixed-Use (The Fig Project)**

The Fig Project was identified as a cumulative project within the Flower Drive Historic District boundary in the Historic Resources Technical Report. The Fig Project originally consisted of demolishing eight existing multi-family residential buildings and constructing a new mixed-use building. The lead agency for CEQA was the City. In the EIR certified by City Council in June 2019, the City determined that the Fig Project would result in a significant direct impact on historical resources, and that even with implementation of mitigation measures, impacts would remain significant and unavoidable.

As a result of legal proceedings occurring after certification of the EIR, the Fig Project was revised to include the following:

- Reduction in the number of demolished buildings within the Flower Drive Historic District from eight to three;
- Retention of two contributing resources that were previously proposed for demolition;
- Relocation of one contributing resource to a new location within the Flower Drive Historic District boundaries;
- Relocation of two contributing resources to a new location outside the Flower Drive Historic District boundaries; and
- Decrease in the new construction's total floor area.

Taken together, the Project and the Fig Project would result in the loss of ten buildings within the district (eight contributing, two non-contributing) as shown in **Figure IV.B-3 Cumulative Changes to the Flower Drive Historic District** and **Figure IV.B-4 Configuration of the Flower Drive Historic District Post-Project Construction**.

Three buildings would be moved from their original locations, including one relocation within the district boundaries and two outside the district boundaries to the immediate south of the historical district boundary along South Flower Drive. Thus, a total of nine contributors would remain on South Flower Drive with the Project and Fig Project, collectively, including seven contiguous buildings – four north of West 39th Street and three south of West 39th Street – within

the district, and two located to the immediate south of the district on South Flower Drive, north of Martin Luther King, Jr. Boulevard.

The separate direct impacts to the Flower Drive Historic District caused by the Project and the Fig Project would be increased when considered together. The combined impacts would result in a more drastic change to the integrity of setting and feeling within the District, and would further reduce the number of extant contributing resources; therefore, the cumulative impact to the Flower Drive Historic District from the Fig Project and the Project would be significant.

- **Related Project No.7 3851 South Grand Avenue Mixed-Use Project**

The 3851 South Grand Avenue Mixed-Use Project was identified as a Related Project in the vicinity of the Project Site, although it is located outside of the Impact Area defined in the Historic Resources Technical Report. It consists of the construction of a new mixed-use building on two contiguous vacant lots east of the I-110 Freeway.

The Letter of Determination issued by the Department of City Planning on December 11, 2023 indicates that the City determined that the 3851 South Grand Avenue Mixed-Use Project would not result in a substantial adverse change to historical resources; therefore, there is no potential for significant cumulative impacts to historical resources.³² In addition, the Related Project is located on the opposite side of I-110 Freeway and is thus physically and visually separated from the Project Site by the freeway, and there are no shared or common resources between the two projects.

- **Related Project No.5 3801 South Grand Avenue Mixed-Use Project**

The 3801 South Grand Avenue Mixed-Use Project was identified as a Related Project in the vicinity of the Project Site, although it is located outside of the Impact Area defined in the Historic Resources Technical Report. It consists of the construction of a new mixed-use building on a vacant lot east of I-110 Freeway.

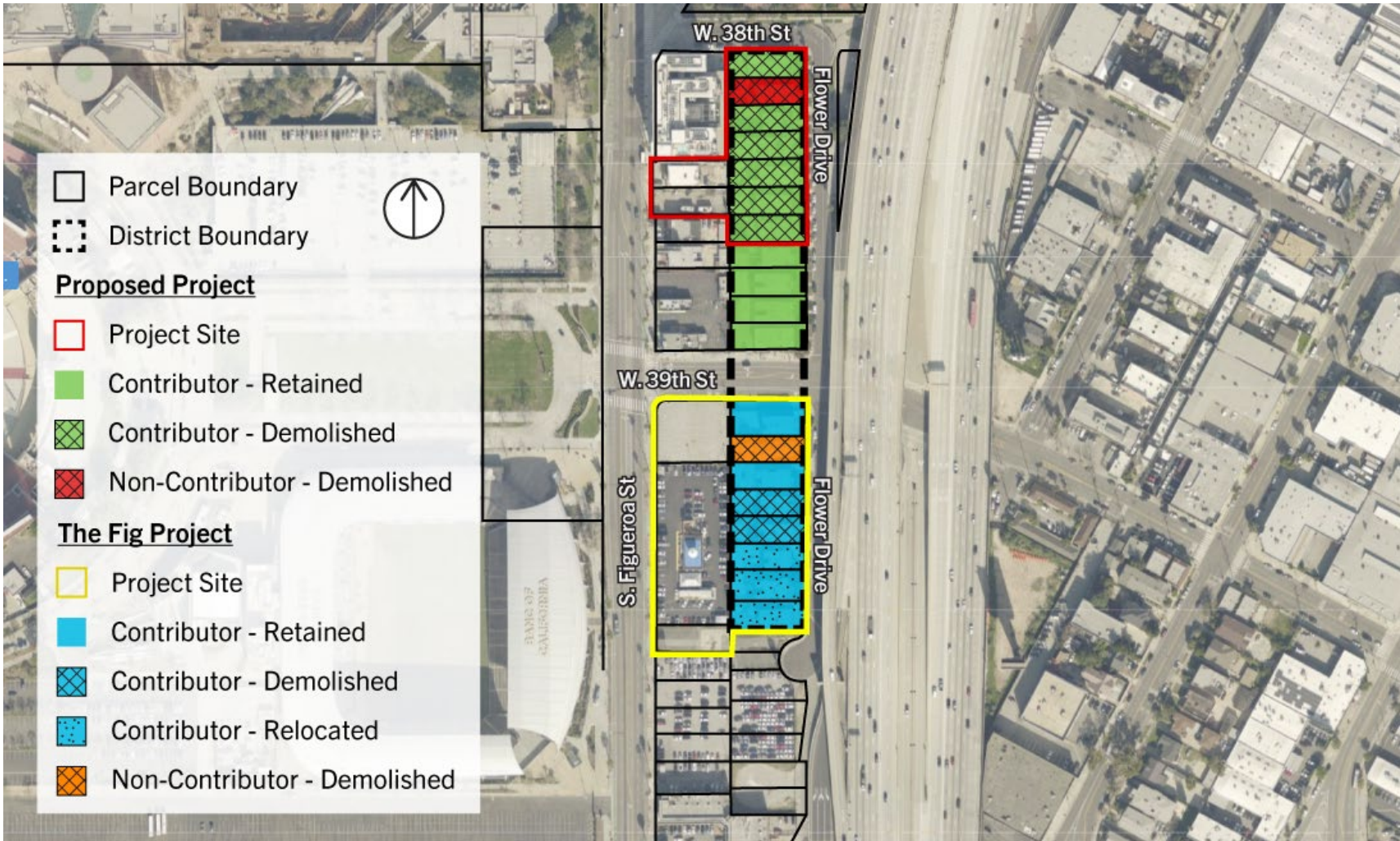
The Letter of Determination issued by the Department of City Planning on August 23, 2023 indicates that the City determined the 3801 South Grand Avenue Mixed-Use Project would not result in a substantial adverse change to historical resources; therefore, there is no potential for significant cumulative impacts to historical resources.³³ In addition, the Related Project is located on the opposite side of I-110 Freeway and is thus physically and visually separated from the Project Site by the freeway, and there are no shared or common resources between the two projects.

As noted above, the Project and the Fig Project would result in the demolition of a total of ten buildings within the existing Flower Drive Historic District, including eight contributors. With the two projects in place, there would be four contributors remaining in their existing configuration on the 3800 block of South Flower Drive (north of West 39th Street), and there would be three

³² City of Los Angeles Department of City Planning, "Case Number: DIR-2023-5190-TOC-HCA, Letter of Determination," <https://planning.lacity.gov/pdiscaseinfo/document/MTE2MzQ0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd>, December 11, 2023, accessed January 2026.

³³ City of Los Angeles Department of City Planning, "Case Number: DIR-2023-2487-TOC-HCA, Letter of Determination," <https://planning.lacity.gov/pdiscaseinfo/document/ODAxOQ0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd>, August 23, 2023, accessed January 2026.

contributors on the 3900 block of South Flower Drive (south of West 39th Street), including two contributors in their existing configuration and one relocated contributor. Further, two contributors would be moved to a location outside the existing district boundary to the south, near the intersection of South Flower Drive and West Martin Luther King Jr. Boulevard. Thus, a total of nine current contributors (seven contiguous and two immediately outside the existing district boundary) would remain on South Flower Drive.

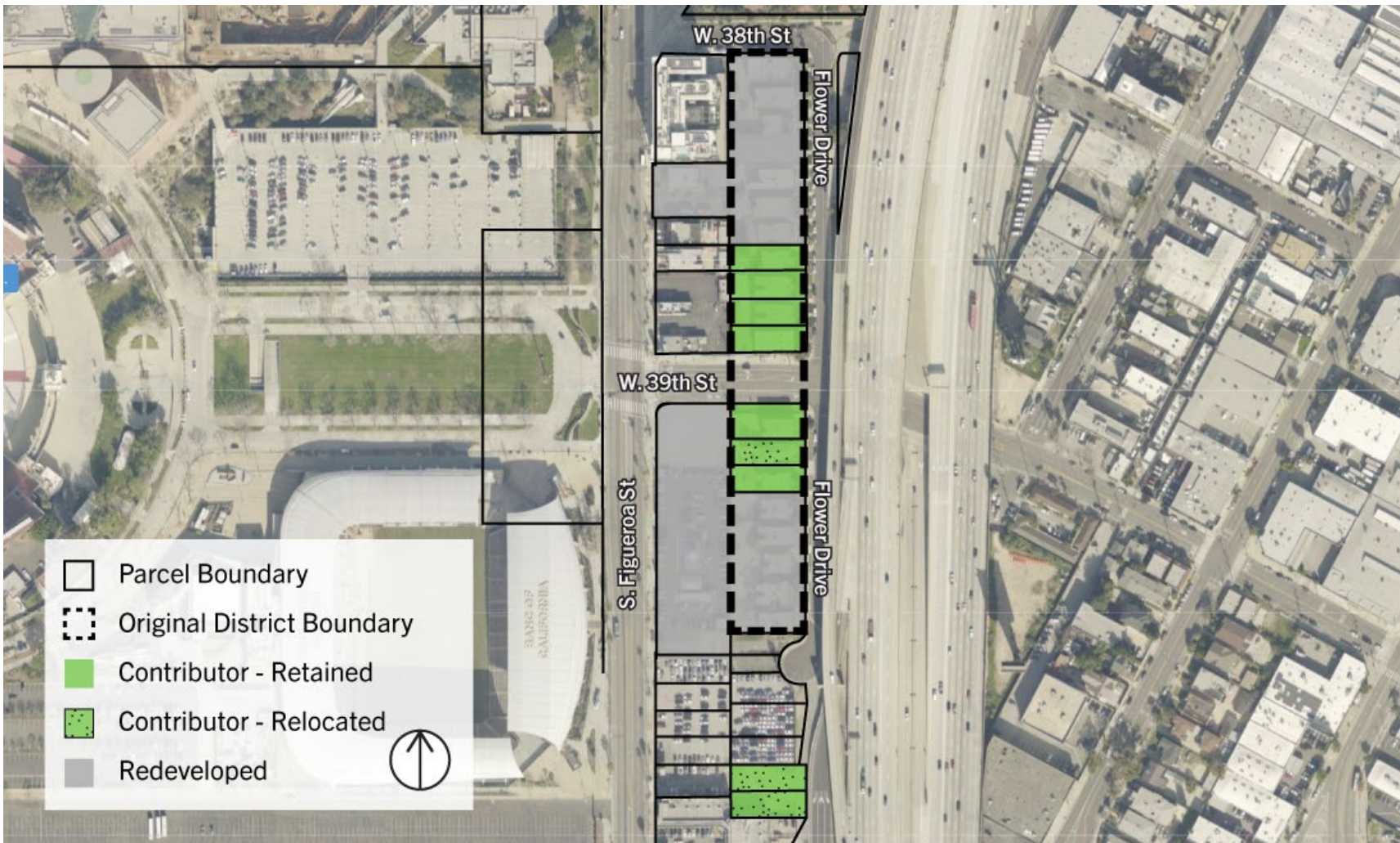


SOURCE: GPA Consulting, 2024



FIGURE IV.B-3: Cumulative Changes to the Flower Drive Historic District

3822 SOUTH FIGUEROA PROJECT



SOURCE: GPA Consulting, 2024



FIGURE IV.B-4: Configuration of the Flower Drive Historic District Post-Project Construction

3822 SOUTH FIGUEROA PROJECT

When the District was determined eligible for listing in the California Register in 2008, the staff evaluation noted the following:

*...The Flower Drive Historic District exhibits a strong sense of historical and architectural cohesion. While each individual residence within the district's boundaries may not be architecturally significant, together this grouping of similar properties, with consistent set-backs, two-story heights, similar spatial arrangements, architectural styling, and common street features gives the Flower Drive neighborhood its strong sense of time and place.*³⁴

The proposed Project and Fig Project would not result in the wholesale loss of all contributing buildings to the Flower Drive Historic District or features that made the district eligible for the California Register listing in 2008. The buildings proposed to remain would be considered contributing resources, and each contributor would retain its respective character-defining physical features, including Mediterranean Revival architectural styling and two-story height. The contiguous grouping would retain the existing interrelationship between each multi-family building, the respective detached garages, and the street. Common street features that unify the buildings, including front yards, consistent setbacks, concrete sidewalks, driveways, and retaining walls would also remain fully or otherwise largely intact for the remaining buildings. The physical features and spatial relationships that made the district eligible would be retained, albeit with a smaller number of contributing buildings, but the eligibility standards in the LACHCS do not identify a minimum number of contributors needed to constitute a potential historic district.

For the reasons discussed above, there is possible that the remaining grouping of contributors would have the potential for continued eligibility for California Register listing under Criteria 1 and 3 under the Multi-Family Residential Historic District eligibility standards in the LACHCS. However, the potential Project-level and cumulative impact regarding continued eligibility for the remainder of the district would not be reduced to a less than significant level. **Accordingly, the Project's impacts on the Flower Drive Historic District would be cumulatively considerable, and cumulative impacts to historic resources would be significant and unavoidable.**

(b) Archaeological Resources

Cumulative impacts related to archaeological resources are generally site-specific as they relate to the particular underlying conditions of a site. Notwithstanding, the Project and the Related Projects are located within a highly urbanized area that has been substantially disturbed and developed over time. As with the Project, each Related Project would mitigate or otherwise treat any inadvertent discovery of any archaeological resources in accordance with applicable conditions of approval, Project Design Features and regulatory measures, which would reduce project-level significant impacts of the Related Projects to a less than significant levels. **Therefore, the Project's incremental contribution to archeological impacts would not be cumulatively considerable. As such, the Project would result in less than significant cumulative impacts to archaeological resources.**

³⁴ Toffelmier, Cynthia. "Flower Drive Historic District, Los Angeles, Los Angeles County, Staff Evaluation." October 23, 2008. On file at South Central Coastal Information Center.

(a) *Human Remains*

With regard to potential cumulative impacts related to human remains, such potential impacts are generally site-specific as they relate to the particular underlying conditions of a site. Notwithstanding, the Project and the Related Projects are located within a highly urbanized area that has been substantially disturbed and developed over time. As with the Project, each Related Project would be required to handle any inadvertent discovery of human remains according to all applicable regulatory measures. **Therefore, the Project's incremental contribution to undiscovered human remains would not be cumulatively considerable and would be less than significant.**

(2) Mitigation Measures

As described above, there are no feasible mitigation measures that could be implemented to reduce the cumulative impacts on historic resources on the Project Site to a less-than-significant level. Due to the unique nature of the historic contributor buildings proposed for demolition by the Project, the implementation of **Mitigation Measures CUL-MM-1 and CUL-MM-2** would not reduce direct impacts to the Flower Historic District to a less-than-significant level.

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

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

(3) Level of Significance After Mitigation

Cumulative impacts to the Flower Drive Historic District caused by the Project and the Fig Project would be significant. Because of the unique and irreplaceable nature of the historic contributor buildings proposed for demolition by the Project and the Fig Project, the implementation of **Mitigation Measures CUL-MM-1 and CUL-MM-2** would not reduce cumulative impacts on the Flower Drive Historic District to a less-than-significant level. **Therefore, the Project's cumulative impacts to historic resources on the Project Site would remain significant and unavoidable after mitigation.**

Cumulative impacts to archaeological resources were determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level would remain less than significant.

Cumulative impacts to human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level would remain less than significant.