

## **IV. Environmental Impact Analysis**

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### **B. Cultural Resources**

#### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project's potential impacts on cultural resources, including historical and archaeological resources and human remains. The analysis of potential impacts to historical resources is based, in part, on the *Violet Street & 7th Place, Los Angeles California—Historical Resource Technical Report* (Historical Resource Report) prepared by GPA Consulting (May 2019), which is included as Appendix C.1 of this Draft EIR. The analysis of potential impacts to archaeological resources is based on a review of previous, existing, and proposed on-site conditions and the *Archaeological Resources Assessment for the 2143 Violet Street Project* (Archaeological Resources Report) prepared by Dudek (March 2020), which is included as Appendix C.2 of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) Historical Resources under CEQA**

###### *(a) Historical Resources Definition*

CEQA requires that environmental protection be given significant consideration in the decision making process. Historic resources are included under environmental protection. Thus, any Project or action which constitutes a substantial adverse change on a historical resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

When the California Register of Historical Resources (California Register) was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which Project impacts are considered to be significantly adverse. Specifically, a “substantial adverse change” means “demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

CEQA defines an historical resource as a resource listed in, or determined eligible for listing, in the California Register. All properties on the California Register are to be

considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. CEQA has been interpreted to create three categories of historical resources:

- Mandatory historical resources are resources “listed in, or determined to be eligible for listing in, the California Register of Historical Resources.”
- Presumptive historical resources are resources “included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1” of the Public Resources Code (PRC), unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- Discretionary historical resources are those resources that are not listed but determined to be eligible under the criteria for the California Register.

To simplify the first three definitions provided in the CEQA statute, an historical resource is a resource that is:

- Listed in the California Register;
- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historical resources.

Section 15064.5 of the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3) supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. An historical resource is a resource that is:

- Identified as significant in an historical resource survey meeting the requirements of PRC Section 5024.1(g);
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (PRC Section 5024.1, Title 14 CCR, Section 4852).

As mentioned above, the fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of PRC Section

5024.1, does not preclude a lead agency from determining that the resource may be an “historical resource” for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places (National Register) are automatically listed in the California Register. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

*(b) Historic Designations and Programs*

A property may be designated as historic by federal, state, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity<sup>1</sup> to continue to evoke the sense of place and time with which it is historically associated.

*(i) National Register of Historic Places*

The National Register was established by the National Historic Preservation Act of 1966 as “an authoritative guide to be used by federal, state and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”<sup>2</sup> The National Park Service administers the National Register program. Under the administration of the National Park Service (NPS), the National Register recognizes properties that are significant at the national, state, and/or local levels.

Criteria

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. To be eligible for listing in the National Register, a property must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 Code of Federal Regulations, Part 60, Section 60.4(g) and possess significance in American history and culture, architecture, engineering, or archaeology. A

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<sup>1</sup> The U.S. Department of the Interior, National Park Service, defines integrity as the ability of a property to convey its significance. The seven aspects of integrity are location, design, setting, materials, workmanship, feeling, and association.

<sup>2</sup> 36 Code of Federal Regulations 60, Section 60.2.

property of potential significance must meet one or more of the following four established criteria:<sup>3</sup>

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Are associated with the lives of significant persons in our past; or
- 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 history or prehistory.

### Integrity

According to National Register Bulletin #15, in addition to meeting one or more of the above criteria, districts, sites, buildings, structures, and objects that are at least 50 years in age must also retain enough historic integrity to be eligible for listing. Historic integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance” and “the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”<sup>4,5</sup> Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity, including location, design, setting, materials, workmanship, feeling, and association.<sup>6</sup>

- *Location* is the place where the historic property was constructed or the place where the historic event occurred.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.

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<sup>3</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, 1990, p. 2.

<sup>4</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, 1990, p. 44.

<sup>5</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 16A: How to Complete the National Register Registration Form*, 1997, p. 4.

<sup>6</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. 1990, p. 44-45.

- *Setting* is the physical environment of a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.

To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when a property is significant.

### Context

To be eligible for listing in the National Register, a property must also be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context.<sup>7</sup> Historic contexts are "those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear."<sup>8</sup> 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.

### Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, district, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The

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<sup>7</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. 1990, p. 7.

<sup>8</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. 1990, p. 7.

identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”<sup>9</sup>

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.<sup>10</sup> A district’s significance and historic integrity should help determine the boundaries. Other factors to be considered include (1) 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; (2) 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; (3) 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 (4) clearly differentiated patterns of historical development, such as commercial versus residential or industrial.<sup>11</sup>

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 historic 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.<sup>12</sup>

#### Secretary of the Interior’s Standards

Projects that may affect historical resources are considered to be mitigated to a less-than-significant level if they are consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards). Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards. NPS issued the Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. Although none of the four treatments as a whole applies specifically to new construction in the vicinity of historical

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<sup>9</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, 1990, p. 5.

<sup>10</sup> 36 Code of Federal Regulations 60, Section 60.3(d).

<sup>11</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 21: Defining Boundaries for National Register Properties Form*, 1995, p. 12.

<sup>12</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 16A: How to Complete the National Register Registration Form*, 1997, p. 16.

resources, Standards #9 and #10 of the Standards for Rehabilitation provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

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

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

*(ii) California Register of Historical Resources*

The California Register is similar to the National Register program. The California Register was enacted in 1992, and its regulations became official on January 1, 1998. Administered by the California Office of Historic Preservation (OHP), the California Register is an authoritative guide in California used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.<sup>13</sup> State law provides that, in order for a property to be considered eligible for listing in the California Register, it must be significant under any of the following four criteria identified by the OHP, which parallel National Register criteria (including that a resource typically must be at least 50 years of age).<sup>14</sup> The criteria for eligibility for listing in the California Register are:

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

An historical resource eligible for listing in the California Register must meet one or more of the significance criteria listed above and retain enough of its historic character or appearance to be recognizable as an historical resource and to convey the reasons for its significance. Similar to the National Register, integrity is evaluated with regard to the

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<sup>13</sup> *California Public Resources Code Section 5024.1(a).*

<sup>14</sup> *California State Parks, Office of Historic Preservation, California Register of Historical Resources, [http://ohp.parks.ca.gov/?page\\_id=21238](http://ohp.parks.ca.gov/?page_id=21238), accessed October 25, 2018.*



retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. Although a resource generally must be at least 50 years of age, the California Register does not exclude resources less than 50 years of age. California Register regulations contained in Title 14, Division 3, Chapter 11.5 of the California Code of Regulations (CCR) include Section 4852(c), which provides that “it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register.” According to Section 4852(d), a resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

The California Register also includes properties that: (1) have been formally determined eligible for listing in, or are listed in, the National Register; (2) are registered State Historical Landmark Number 770, and all consecutively numbered landmarks above Number 770; or (3) are points of historical interest, which have been reviewed by the California OHP and recommended for listing by the State Historical Resources Commission. Resources that may be nominated for listing in the California Register include: individual historic resources; historic resources contributing to the significance of an historic district; historic resources identified as significant in historic resources surveys; historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts; and local landmarks.<sup>15</sup>

*(iii) Local*

City of Los Angeles Cultural Heritage Ordinance

The City’s Cultural Heritage Ordinance, originally adopted by the Los Angeles City Council in 1962 (Sections 22.171 *et seq.* of the Los Angeles Administrative Code) and later amended in 2018 (Ordinance No. 185472), created the City’s Cultural Heritage Commission and established criteria for designating City of Los Angeles Historic-Cultural Monuments (HCMs). Section 22.171.7 of the Los Angeles Administrative Code defines the criteria for designation as any site, building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites that:

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 or community; or

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<sup>15</sup> *California Public Resources Code, Section 5024.1(e).*

2. The proposed HCM is associated with the lives of historic personages important to national, state or local history; or
3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.<sup>16</sup>

Designation recognizes the unique historical, cultural, or architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for HCM status. Buildings may be eligible for HCM status if they meet at least one of the criteria in the Cultural Heritage Ordinance and retain their historic design characteristics and materials. Unlike the National and California Registers, the Cultural Heritage Ordinance does not require properties to reach a minimum age and does not identify concepts such as physical integrity or period of significance.

#### Historic Preservation Overlay Zones

The City of Los Angeles also recognizes historic districts as Historic Preservation Overlay Zones (HPOZs).<sup>17</sup> The HPOZ is a planning tool that adds a level of protection to an area by creating a review board to evaluate proposals for alterations, demolitions, or new construction. An HPOZ is intended to include a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Contributing resources must meet at least one of the following criteria:<sup>18</sup>

1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
3. Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of a historic place or area of historic interest in the City.

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<sup>16</sup> *Cultural Heritage Ordinance: Section 22.171.7 et seq. of the City of Los Angeles Administrative Code.*

<sup>17</sup> *Los Angeles Municipal Code Section 12.20.3*

<sup>18</sup> *Los Angeles Municipal Code Section 12.20.3.F.3(c).*

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

The Los Angeles Historic Resources Survey, or SurveyLA, is conducted under the DCP's Office of Historic Resources. SurveyLA is the City's first comprehensive program to identify and document potentially significant historic resources. Surveys conducted under SurveyLA cover the period from approximately 1865 to 1980 and include individual resources such as buildings, structures, objects, natural features, and cultural landscapes, as well as areas and districts. Archaeological resources will be included in a future survey phase. Significant resources 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 commenced in 2010 by community plan area and were completed in 2016.<sup>19</sup> SurveyLA findings are currently being published at HistoricPlacesLA, the City's online information and management system created to inventory, map, and help protect historic resources.<sup>20,21</sup>

As described in detail in the SurveyLA Field Survey Results Master Report, the surveys identify and evaluate properties according to standardized criteria for listing in the National Register, California Register, and for local designation as HCMs and HPOZs. 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 and nominations to the California or National Registers are separate processes that include property owner notification and public hearings. SurveyLA utilizes the Los Angeles Citywide Historic Context Statement (HCS) to provide a framework for identifying and evaluating the City's historical resources. Development of the HCS is also ongoing with oversight by the Office of Historic Resources.

### Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan adopted its Conservation Element in 2001. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historic heritage. The Conservation Element establishes a policy to continue to protect historic and cultural sites and/or resources potentially affected

<sup>19</sup> City of Los Angeles, Department of City Planning, Office of Historic Resources, *Field Survey Results Master Report*, August 2016.

<sup>20</sup> City of Los Angeles, Department of City Planning, Office of Historic Resources, *SurveyLA, SurveyLA Findings and Reports*, <https://planning.lacity.org/preservation-design/historic-resources-survey#Survey%20List>, accessed April 8, 2020.

<sup>21</sup> City of Los Angeles, Department of City Planning, Office of Historic Resources, *HistoricPlacesLA*, [www.historicplacesla.org/index.htm](http://www.historicplacesla.org/index.htm), accessed April 8, 2020.

by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historic sites and resources for historic, cultural, research, and community educational purposes.<sup>22</sup>

### Central City North Community Plan

The City of Los Angeles General Plan also includes 35 Community Plans that comprise the General Plan's Land Use Element. As discussed in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the Central City North Community Plan area. The Central City North Community Plan includes the following objectives and policies related to cultural resources:

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

## (2) Archaeological Resources

Federal, state, and local governments have developed laws and regulations to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Environmental Policy Act (NEPA), National Historic Preservation Act, and CEQA are the basic federal and state laws governing the preservation of historical and archaeological resources of national, regional, state, and local significance. As archaeological resources are also considered historical resources, regulations applicable to historical resources are also applicable to archaeological resources. Whereas federal agencies must follow federal archaeological regulations, most projects by private

<sup>22</sup> *City of Los Angeles General Plan, Conservation Element, September 2001, pp. II-6 through II-9.*

developers and landowners do not require this level of compliance. Thus, as the Project would not require a federal permit and would not use federal money, federal archaeological regulations are not applicable to the Project.

*(a) California Environmental Quality Act*

State archaeological regulations affecting the Project include the statutes and guidelines contained in CEQA (PRC Section 21083.2 and Section 21084.1) and the CEQA Guidelines (CCR, Title 14, Section 15064.5). CEQA requires lead agencies to carefully consider the potential effects of a project on archaeological resources. Several agency publications, such as the technical assistance bulletins produced by the State Office of Historical Preservation, provide guidance regarding procedures to identify such resources, evaluate their importance, and estimate potential effects.

CEQA Guidelines Section 15064.5(c) requires that:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource.
- If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of PRC Section 21084.1, and this section, CEQA Guidelines Section 15126.4, and the limits contained in PRC Section 21083.2 of the do not apply.
- If an archaeological site does not meet the criteria for historical resources but does meet the definition of a unique archaeological resource in PRC Section 21083.2, the site shall be treated in accordance with the provisions of Section 21083.2.<sup>23</sup> The time and cost limitations described in PRC Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.<sup>24</sup>

<sup>23</sup> *Per subdivision (g) of PRC Section 21083.2, a unique archaeological resource means 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: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.*

<sup>24</sup> *If it can be demonstrated that a project may impact a unique archaeological resource, Section 21083.2 states that the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. In addition, to the extent that unique archeological resources are not preserved in place of left in an undisturbed state, mitigation measures shall be required as specified in Section 21083.2. The project applicant shall provide a guarantee to the lead agency to pay one-half of the estimated cost of mitigating the significant effects.*

- If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the EIR, but they need not be considered further in the CEQA process.

CEQA recognizes that archaeological resources are part of the environment, and a project that “may cause a substantial adverse change in the significance of an historical resource [including archaeological resources] is a project that may have a significant effect on the environment” (PRC Section 21084.1). For purposes of CEQA, an historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the California Register (PRC Section 21084.1). Refer to the previous discussion in this section regarding the California Register for a list of the criteria used to determine whether a resource is eligible for listing in the California Register and is, therefore, considered an historical resource under CEQA.

Archaeologists assess sites based on all four criteria, but usually focus on the fourth criterion previously provided, which is whether the resource “[h]as yielded, or may be likely to yield, information important in prehistory or history.” The CCR also provides that cultural resources of local significance are eligible for listing in the California Register (CCR, Title 14, Section 4852).

In addition to archaeological resources that qualify as historical resources, CEQA requires consideration of project impacts to unique archaeological resources, defined as 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 that 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 [PRC Section 21083.2(g)].

In addition to having significance in accordance with the applicable criteria, resources must have integrity for the period of significance. The period of significance is the date or span of time within which notable events transpired at a site, or the period that

notable individuals made their important contributions to a site. Integrity is the ability of that property to convey its significance.<sup>25</sup>

With regard to human remains, CEQA Guidelines Section 15064.5 addresses consultation requirements if an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project site. This section of the CEQA Guidelines, Health and Safety Code Section 7050.5, and PRC Section 5097.9 also address treatment of human remains in the event of accidental discovery.

*(b) Los Angeles General Plan Conservation Element*

Section 3 of the Los Angeles General Plan Conservation Element, adopted in September 2001, includes policies for the protection of archaeological and paleontological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. It is also the City's policy that paleontological resources be protected for historical, cultural research, and/or educational purposes. Section 3 sets as an objective the identification and protection of significant paleontological sites and/or resources known to exist or that are identified during "land development, demolition, or property modification activities." 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 historical 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.<sup>26</sup>

## **b. Existing Conditions**

### **(1) Historical Resources**

*(a) Description of Project Site and Study Area*

The Project Site is bounded by 7th Place to the north, rail lines to the east, Violet Street to the south, and an alley to the west. There are seven industrial buildings (labeled as Buildings A through G in the Historical Resource Report) on the Project Site that were constructed primarily in the first half of the 20th century. All seven buildings are located on

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<sup>25</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin, Guidelines for Evaluating and Registering Archaeological Properties*, 2000.

<sup>26</sup> *City of Los Angeles General Plan, Conservation Element, September 2001, pp. II-6 through II-9.*

the northern portion of the Project Site. In addition, a large open metal shed (Building H in the Historical Resource Report) is located on the southwestern portion of the Project Site

The study area established for the purposes of the historical resources analysis includes the Project Site and adjacent parcels within one block north, south, east, and west of the Project Site. The study area is roughly bounded by 7th Street to the north, Bay Street to the south, Mateo Street to the west, and the railroad right-of-way to the east, which runs parallel to the Los Angeles River further east. In addition, South Santa Fe Avenue north-south street runs west of the Project Site and bisects the study area. The existing buildings in the study area are mostly low- to mid-rise industrial buildings constructed between the 1920s through the 1980s. The Ford Motor Company Factory, a large two- to five-story manufacturing building from 1914, is located west of the Project Site across South Santa Fe Avenue between 7th Street and Violet Street. The study area also includes more recently constructed buildings with larger massing, truck bays, and little to no fenestration, such as those west of the Project Site. Many parcels in the area remain undeveloped and are currently being used as surface parking lots. Although the study area is developed with industrial buildings, it does not reflect a cohesive period or method of construction.

The study area is shown in Figure IV.B-1 on page IV.B-17, and the existing buildings on the Project Site are shown in Figure IV.B-2 on page IV.B-18.

*(b) Historical Background and Context of the Project Site and Study Area*

As discussed in the Historical Resources Report included as Appendix C.1 of this Draft EIR, the Project Site is located on the west side of the Los Angeles River and is in one of the earliest and primary industrial districts of the City.<sup>27</sup> The Project Site and study area were initially developed with single-family dwellings and associated outbuildings before 1900. Between 1900 and 1938, the majority of the residences in the study area, including those on the Project Site, were demolished as a result of the redevelopment of railroad facilities and zoning amendments during the 1910s and 1920s. The City of Los Angeles continued to annex existing communities, as well as available land in the San Fernando Valley, and zoning was amended to eliminate residential development and accommodate the construction of more offices, retail, and manufacturing facilities in the downtown area. By the end of 1920s, the study area was fully established as an industrial

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<sup>27</sup> This section of the Historical Resources Report relies on numerous sources, including various historic resources surveys and the Project's Phase I Environmental Site Assessment. Refer to Appendix C.1 of this Draft EIR for a detailed accounting of the source material used.

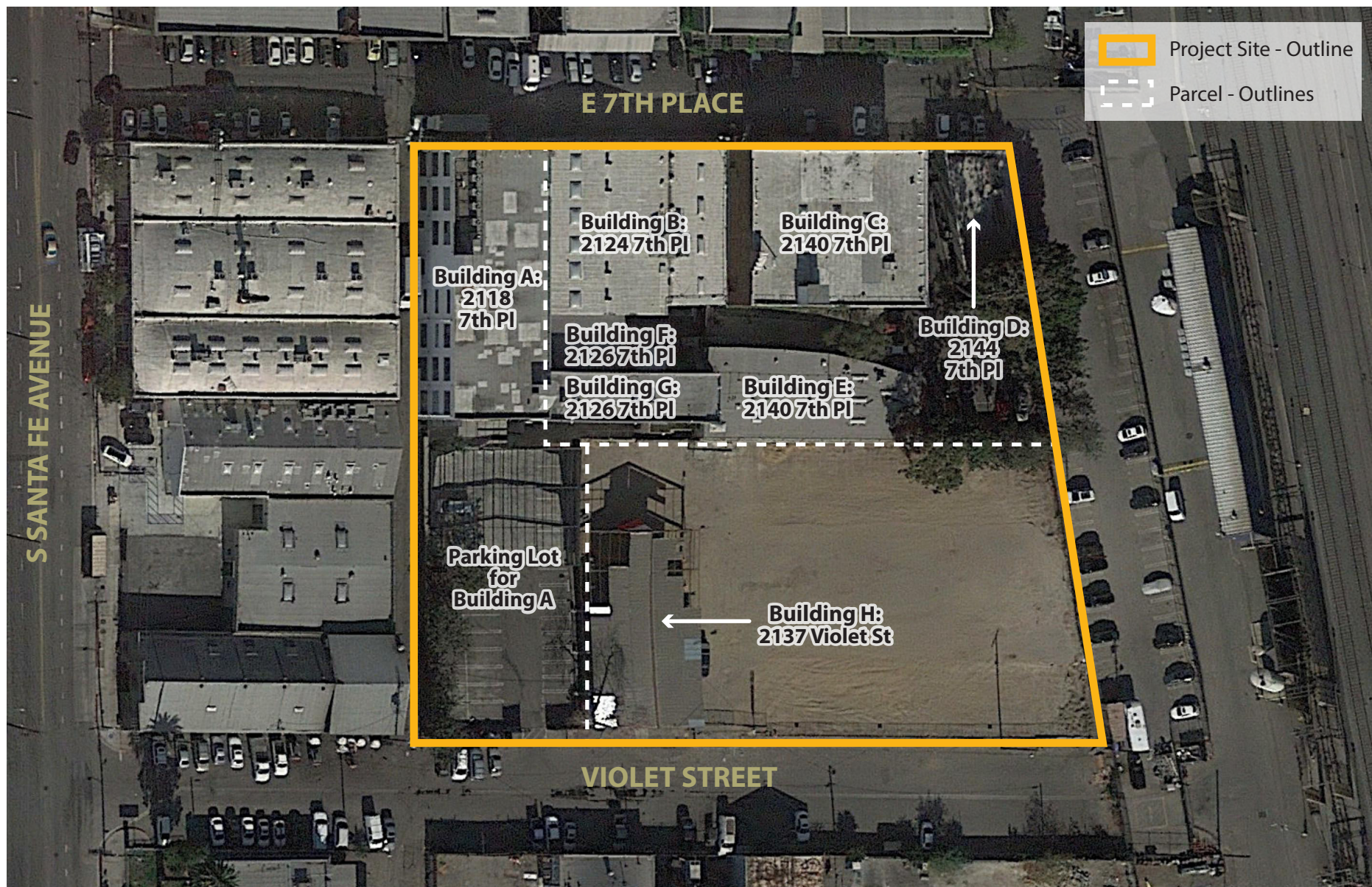




- Project Site - Outline
- Study Area - one block of Project Site
- Parcels within study area (one block of Project site block)

**Figure IV.B-1**  
Project Site and Study Area





**Figure IV.B-2**  
Existing Buildings on the Project Site

hub. Industrial development in the study area declined following World War II. After the Interstate Highway System was launched in the 1950s, the trucking industry became the preferred mode of transportation for industrial activity and the railroads declined. At the same time, many pre-war industrial districts had become highly congested urban areas that were less convenient for truck access, unlike newly-built factories and warehouses on the outskirts of cities and in suburbs. The construction of an expansive freeway network throughout Southern California also drastically altered the configuration and physical character of the study area.

The study area continued to maintain its character as an industrial center, and buildings were repurposed from one processing or manufacturing operation to another as companies and their products evolved. In the 1950s, the study area was home to automotive manufacturing, trucking and transport, furniture manufacturing and storage, paint and chemical manufacturing, and paper and plastic production, as well as food processing and lumber and woodworking operations. By the 1960s, however, the character of the area began to evolve away from that of an industrial center as local industries and manufacturers struggled to adapt to the competition brought on by containerization and other modern technologies. As a result, many buildings in the study area had become vacant by the 1970s.

The use of the industrial buildings in the study area evolved as artists and other creative types began to congregate amidst the vacant buildings and empty lots. Industrial buildings found new life as gallery space and underground hangouts for a burgeoning art and music scene. By the 1980s, the study area was home to several avant-garde art galleries, giving rise to the group of artists now called the “Young Turks.” In 1981, the City of Los Angeles implemented Ordinance No. 155,843, which legalized the residential use of formerly industrial buildings for artists, legitimizing the area as a live-work haven for artists and creative types. In the mid-1990s, the area was officially designated as the Arts District by the City. A subsequent wave of development began in 1999 with the passage of the Adaptive Reuse Ordinance, which relaxed zoning codes and allowed for the conversion of pre-1974 commercial and industrial buildings into residences for artists and non-artists alike. The study area continues to be characterized by industrial building types from the first half of the 20th century that are adapted for new commercial and residential development to meet the needs of the growing community.

### *(c) Historical Resources on the Project Site*

SurveyLA did not identify the Project Site as being part of a potential historic district within the historic resources survey of the Central City North Community Plan Area in 2016. However, SurveyLA identified 2140 E. 7th Place (Building C), one of eight buildings on the Project Site, as eligible for listing in the National Register and California Register, and for designation as an HCM (Status Codes 3S, 3CS, and 5S3). No other buildings on the

Project Site were identified as eligible. A detailed discussion of SurveyLA's evaluation of the buildings on the Project Site is provided in the Historical Resource Report provided as Appendix C.1, of this Draft EIR.

All of the existing buildings on the Project Site are over 45 years of age and were evaluated under the established criteria and aspects of integrity to determine their eligibility for listing as a historical resource under national, state, and local landmark or historic district designation programs. The significance of a property must be evaluated within its historic context(s), which is defined as patterns or trends in history by which a specific property is understood. The applicable context and theme from the Los Angeles Citywide HCS for the evaluation of the buildings on the Project Site is the Early Industrial Development theme within the Industrial Development context. A discussion of the Early Industrial Development theme and the detailed evaluations of each of the eight buildings are provided in the Historical Resource Report. A summary of the evaluation for each building is provided below, and the locations of the buildings are shown on Figure IV.B-2 on page IV.B-18:

- **Building A (2118 E. 7th Place):** Building A does not appear to meet eligibility standards for the Early Industrial Development theme as outlined in the Los Angeles Citywide HCS due to a lack of historic significance, architectural character, and physical integrity. While this building dates from the period of significance for early industrial buildings, it is neither a rare surviving example nor a representation of a very early phase of industrial development in the Project area. The building is not associated with the lives of historic personages important to national, state, or local history; does not demonstrate any innovative, important, or outstanding design features; and cannot be considered the work of a master. Specifically, the building was designed by Roy W. Fredin who was an industrial arts teacher in Pasadena and a mechanical engineer for G.M. Gianni Engineering Company. He was not an architect (he does not appear in the AIA membership directory) and is not recognized as a notable designer. Therefore, the building cannot be considered the work of a master. The building is a reinforced concrete structure that does not demonstrate any innovative, important, or outstanding design features. All of the building's ground floor doors and several of its ground floor windows have been replaced with new metal-and-glass infill. The building has been altered since initial design and construction. Building A is not part of any grouping of properties linked by common history or design that could be eligible as a district. When evaluated against the seven aspects of integrity, Building A does not retain integrity as a whole. Therefore, Building A does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance and integrity.
- **Building B (2124 E. 7th Place):** Building B does not appear to meet eligibility standards for the Early Industrial Development theme as outlined in the Los



Angeles Citywide HCS due to a lack of age, historic significance, architectural character, and physical integrity. While this building dates from the period of significance for early industrial buildings, it is neither a rare surviving example nor a representation of a very early phase of industrial development in the Project area. The building does not exhibit the character-defining elements of eligible examples of Early Industrial Development property types. The building is not associated with the lives of historic personages important to national, state, or local history; does not demonstrate any innovative, important, or outstanding design features; and cannot be considered the work of a master. Specifically, the building is a warehouse that does not demonstrate any innovative, important, or outstanding design features. It has also been substantially altered since its construction, including the replacement of the roof, cladding, entrances, and the construction of an addition to the east. No architect was listed on permits for the building, and, as such, it cannot be considered the work of a master. Building B is not part of any grouping of properties linked by common history or design that could be eligible as a district. Building B does not have historic significance; therefore, a discussion of its integrity, or its ability to convey significance, is not applicable. Therefore, Building B does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance.

- **Building C (2140 E. 7th Place):** Building C was not re-evaluated because it was identified by SurveyLA as an “excellent and rare example of an est. 1910 industrial building in Los Angeles’ primary industrial district; one of few remaining examples from this period” and was evaluated as appearing eligible for listing in the National Register and California Register, and for designation as an HCM, corresponding to Status Codes 3S, 3CS, and 5S3. SurveyLA did not identify a historic district that includes Building C or other buildings in the vicinity.
- **Building D (2144 E. 7th Place):** Building D does not appear to meet eligibility standards for the Early Industrial Development theme as outlined in the Los Angeles Citywide HCS due to a lack of age, historic significance, architectural character, and physical integrity. While this building dates from the period of significance for early industrial buildings, it is neither a rare surviving example nor does it represent a very early phase of industrial development in this area. The building does not exhibit the character-defining elements of eligible examples of Early Industrial Development property types. The building does not appear to be associated with significant industries or industrialists; does not demonstrate any innovative, important, or outstanding design features; and cannot be considered the work of a master. Specifically, Building D is a modest and unornamented utilitarian garage developed in 1922. It is a common type of industrial building built in the early twentieth century and does not demonstrate any innovative, important, or outstanding design features. No architect was listed on permits for the building, and, as such, it cannot be considered the work of a master. It is also highly altered. The rear portion of the building was likely demolished between 1980 and 1991. Building D is not part of any grouping of properties linked by common history or design that could be eligible as a district. Building D

does not have historic significance; therefore, a discussion of its integrity, or its ability to convey significance, is not applicable. Therefore, Building D does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance.

- **Building E (2140 E. 7th Place):** Building E does not appear to meet eligibility standards for the Early Industrial Development theme as outlined in the Los Angeles Citywide HCS due to a lack of age, historic significance, architectural character, and physical integrity. While this building dates from the period of significance for early industrial buildings, it is neither a rare surviving example nor a representation of a very early phase of industrial development in the Project area. The building does not exhibit the character-defining elements of eligible examples of Early Industrial Development property types. The building does not appear to be associated with the lives of historic personages important to national, state or local history; does not demonstrate any innovative, important, or outstanding design features; and cannot be considered the work of a master. Specifically, Building E is an altered utilitarian building that does not demonstrate any innovative, important, or outstanding design features. It has also been substantially altered since its construction as a truck shelter. No architect was listed on permits for the building, and, as such, it cannot be considered the work of a master. Building E is not part of any grouping of properties linked by common history or design that could be eligible as a district. Building E does not have historic significance; therefore, a discussion of its integrity, or its ability to convey significance, is not applicable. Therefore, Building E does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance.
- **Building F (2126 E. 7th Place):** Building F does not appear to meet eligibility standards for the Early Industrial Development theme as outlined in the Los Angeles Citywide HCS due to a lack of age, historic significance, architectural character, and physical integrity. While this building dates from the period of significance for early industrial buildings, it is neither a rare surviving example nor a representation of a very early phase of industrial development in the Project area. The building does not exhibit the character-defining elements of eligible examples of Early Industrial Development property types. The building does not appear to be associated with the lives of historic personages important to national, state or local history; does not demonstrate any innovative, important, or outstanding design features; and cannot be considered the work of a master. Building F is an altered utilitarian building that does not demonstrate any innovative, important, or outstanding design features. It has also been substantially altered since its construction as a truck shelter. No architect was listed on permits for the building, and, as such, it cannot be considered the work of a master. Building F is not part of any grouping of properties linked by common history or design that could be eligible as a district. Building F does not have historic significance; therefore, a discussion of its integrity, or its ability to convey significance, is not applicable. Therefore, Building F does not appear to

be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance.

- **Building G (2126 E. 7th Place):** Building G does not appear to meet eligibility standards for the Early Industrial Development theme as outlined in the Los Angeles Citywide HCS due to a lack of age, historic significance, architectural character, and physical integrity. While this building dates from the period of significance for early industrial buildings, it is neither a rare surviving example nor a representation of a very early phase of industrial development in the Project area. The building does not exhibit the character-defining elements of eligible examples of Early Industrial Development property types. The building does not appear to be associated with the lives of historic personages important to national, state or local history. Specifically, Building G is a substantially altered two-story utilitarian building originally constructed as a one-story building in 1922. The building was designed by recognized master architects Walker & Eisen; however, it does not appear to be a significant building within the firm's body of work. The building has been substantially altered since original construction and design, including the addition of a second story and possible cladding replacement. During the 1920s, the partnership of Walker & Eisen was known for its large-scale hotel, office, and theater buildings in Beaux Arts and Art Deco styles. Examples of the firm's work from 1921 to 1923, at the time of Building G's construction, include the Ambassador Hotel in Los Angeles (1921, since demolished), Taft Building in Hollywood (1923), and Breakers Hotel in Long Beach (1925). Building G does not exhibit the distinctive design features that distinguish the work of these masterful architects and, as such, is not a significant example of their work. The building does not retain any indication that it is innovative or the work of this masterful firm. Building G is not part of any grouping of properties linked by common history or design that could be eligible as a district. When evaluated against the seven aspects of integrity, Building G lacks integrity as a whole. Therefore, Building G does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance and integrity.
- **Building H (2137 Violet Street):** Building H which is a metal shed does not appear to meet eligibility standards for the Early Industrial Development theme as outlined in the Los Angeles Citywide HCS due to a lack of age, historic significance, and architectural character. The building does not exhibit the character-defining elements of eligible examples of Early Industrial Development property types. The building does not appear to be associated with the lives of historic personages important to national, state or local history; does not demonstrate any innovative, important, or outstanding design features; and cannot be considered the work of a master. Specifically, Building H is a storage shed that does not demonstrate any innovative, important, or outstanding design features. No architect was listed on permits for the building, and, as such, it cannot be considered the work of a master. Building H is not part of any grouping of properties linked by common history or design that could be eligible as a district. Building H does not have historic significance; therefore, a

discussion of its integrity, or its ability to convey significance, is not applicable. Therefore, Building F does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance.

Based on the evaluations, seven of the buildings on the Project Site would not be considered historical resources under CEQA. One building on the Project Site, Building C, is presumed to be a historical resource under CEQA because it was identified as eligible for national, state, and local landmark programs by SurveyLA.

*(d) Historical Resources in the Project Vicinity*

The Historical Resource Report identified three historical resources within the study area. The three identified historic resources are described below:

- **Engine Company No. 17 (710 S. Santa Fe Avenue):** Engine Company No. 17 is a Beaux Arts/Classical Revival style two-story fire station constructed in 1927. According to the 2002 Final EIR prepared for the Central Industrial Redevelopment Project Area, the building has been formally determined eligible for listing in the National Register. However, it is not included in the California Historical Resources Information System (CHRIS).
- **Ford Motor Company Factory (2046–2060 E. 7th Street and 715–821 S. Santa Fe Avenue):** The five-story Ford Motor Company Factory building was completed in 1914 as a manufacturing plant for Ford Model T automobiles. The building was formally determined eligible for listing in the National Register in 2014 as part of a Part 1 Tax Credit Certification.
- **2035 E. Bay Street:** The vernacular brick building was constructed in 1912 as a storage warehouse for pipe and machinery. The building was evaluated as eligible for listing in the National Register, California Register, and local landmark or historic district designation programs by SurveyLA as an “excellent and rare example of a 1911 industrial building in Los Angeles’ primary industrial district” under the theme of Early Industrial Development from 1880 through 1945.

## (2) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. As part of the Archaeological Resources Report included as Appendix C.2 of this Draft EIR, on April 30, 2018, a cultural resources records search was conducted through the South Central Coastal Information Center (SCCIC) located at the California State University, Fullerton. The results of the record search indicate that a total of 38 cultural resource studies have been conducted within a 0.5-mile radius of the Project Site, one of which included the Project Site. As discussed in detail in the Archaeological



Resources Report included as Appendix C.2 of the Draft EIR, the one cultural resources study that included the Project Site, LA-13239, identified the extent of the Zanja Madre. The Zanja Madre network and subsequent additional Zanja Madre segments were Los Angeles' original irrigation system, and the network is thought to have run throughout the City in various branches, predominantly along major roads. Although the location of many of the segments are unconfirmed, LA-13239 used historic and ethnographic evidence to map the Zanja Madre, which showed an unconfirmed section of a historical-era water conveyance system running south along or near Alameda Street, approximately 0.17 mile west of the Project Site. However, no physical evidence of the Zanja Madre has been identified or otherwise confirmed along this mapped segment nearest the Project Site. The closest physically confirmed segment of the Zanja Madre has been unearthed between approximately 0.85 mile and two miles to the north of the Project Site, the most recent being at Blossom Plaza on North Broadway (1.5 miles north of the Project Site) in 2014. The Zanja Madre segment that is mapped approximately 0.17 mile west of the Project Site has been described as a wooden flume measuring 3 feet by 1 foot and tunnel zanja running from the end of Zanja 6-1, located near the intersection of South Hewitt Street and 1st Street, then south along present day Alameda Street until reaching the city boundaries, just below the ground surface. Even if a portion of this Zanja Madre segment runs through the Project Site, it is very unlikely that it is still intact due to the shallow nature of its location just below ground surface that previous construction would have encountered or disturbed to accommodate the buildings' foundation and footings.

The records search also found four historic-era archaeological sites located within a 0.5-mile radius of the Project Site. These archaeological sites consist of historic-era refuse scatters dating to between 1850 and 1945

### 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 an 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 formal cemeteries?***

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

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

### (1) Historic Resources

- If the project would result in a substantial adverse change in the significance of a historic resource due to:
  - Demolition of a significant resource;
  - Relocation that does not maintain the integrity and significance of a significant resource;
  - Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; and/or,
  - Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.<sup>28</sup> A substantial adverse change in the significance of an historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.<sup>29</sup>

### (2) 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;

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<sup>28</sup> *CEQA Guidelines, Section 15064.5(b).*

<sup>29</sup> *CEQA Guidelines, Section 15064.5(b)(1).*

- 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; and
- Is at least 100-years-old<sup>30</sup> and possesses substantial stratigraphic integrity; or,
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

## **b. Methodology**

### **(1) Historical Resources**

The Historical Resources Report provided in Appendix C.1 of this Draft EIR is based, in part, on a records search from the SCCIC to determine whether or not the Project Site contains any properties that are currently listed under national, state, or local landmark or historic district programs and whether or not any properties have been previously identified or evaluated as historical resources as defined by CEQA. This research involved a review of the CHRIS, which includes data on properties listed and determined to be eligible for listing in the National Register, California Register, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resources surveys and other planning activities. The Historical Resources Report is also based on the SurveyLA findings for the Central City North Community Plan Area, field inspections of the Project Site and vicinity, and research on the history of the Project Site and buildings. As indicated above, under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources, and if so; (2) a determination of whether the Project would result in a “substantial adverse change” in the significance of the resource or resources.

### **(2) Archaeological Resources**

To address potential impacts to archaeological resources, formal records searches were conducted by the SCCIC to assess the archaeological sensitivity of the Project Site

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<sup>30</sup> 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.

and vicinity. In addition, an evaluation of existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources.

### **c. Project Design Features**

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

### **d. Analysis of Project Impacts**

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

#### **(1) Impact Analysis**

##### ***(a) Direct Impacts***

The Project would demolish Buildings D, E, F, and H in order to develop the proposed residential, office, and retail/restaurant uses on the Project Site. However, these buildings are not historical resources defined by CEQA. Therefore, the demolition of these buildings would not cause a direct impact to historical resources.

As discussed above under Subsection 2.b.(1)(c) on page IV.B-19, there is one historical resource on the Project Site. Building C (front building at 2140 E. 7th Place) was previously identified by SurveyLA as a historical resource. Therefore, potential direct impacts on Building C are discussed below.

The proposed Project design would retain the pedestrian-level, street-facing setting of Buildings A, B, and C along East 7th Place to the driveway along the eastern side of Building C. These buildings would be incorporated into the overall Project, retaining the fabric of the neighborhood, and no changes are proposed to the use of these buildings as live-work lofts. The proposed Project design is compatible with Building C, which, as noted above, is being treated as a historical resource for purposes of this analysis. The proposed Project design is also compatible with the existing streetscape along East 7th Place. The buildings that would be retained do not exceed three stories in height. At East 7th Place, new construction would be three stories in height and step back to eight stories at the rear portion. Both new buildings would be physically separated from the older buildings that would be retained. The proposed Project would integrate new construction with design sympathetic to existing building heights and irregular site plans. Therefore, the proposed Project would not cause a direct impact to the setting of the existing buildings, including Building C.

**Based on the above, the Project would not directly cause a substantial adverse change in the significance of a historical resource.**

*(b) Indirect Impacts*

Potential indirect impacts were also analyzed to determine if the Project would cause a “material impairment” to the significance of the three identified historical resources in the study area. Material impairment would occur if a project demolishes or alters the physical characteristics that convey the significance of a historical resource and that justify its inclusion in or eligibility for inclusion in national, state, or local landmark or historic district programs pursuant to the requirements of CEQA. Such an effect would only occur if the historical resources in the study area no longer retained sufficient integrity to convey their significance as a result of the Project.

As discussed above, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. Because the Project would not alter the physical features of the historical resources in the study area, the only relevant aspect with respect to the indirect impact of the new buildings on these historical resources is setting. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property or historic district as well as the resource’s broader surroundings. The analysis of indirect impacts considers whether the integrity of setting of the historical resources in the study area would be diminished by the new construction to the degree they would no longer qualify as historical resources under national, state, or local landmark or historic district programs.

The Project would construct a 36-story residential tower and an eight-story office building on the Project Site. Development of the residential tower would introduce a new visual element to the setting of the identified historical resources. However, the overall integrity of setting in the study area is relatively low due to the substantial amount of development occurring in the study area. Thus, new construction on the Project Site would not cause further impairment of the integrity of setting of the identified historical resources. In addition, the Project is physically separated from all of the identified historical resources. Because the physical distance between these historical resources and the Project site would be maintained, the relationship of the buildings to the streetscape would remain intact and would not be altered by the Project. The Project does not share street frontage with any of the historical resources in the study area and would not have the potential to obstruct views of the historical resources in the study area. Although the Project introduces a new visual element to the area east of these historical resources, the relationships between the buildings, other significant features, and surrounding streets would remain largely intact overall. Furthermore, although the Project would cast shadows to the study area, these shadows would not alter the physical features of the historical resources in the study area, and no publicly visible elevations of the historical resources would be physically

obscured by the Project. Therefore, the Project would not have any impact on the physical characteristics that convey the historic significance of the three identified historical resources and justify their inclusion in, or eligibility for, applicable landmark and historic district designation programs. **As such, the Project would not indirectly cause a substantial adverse change in the significance of a historical resource.**

**Based on the above, and as discussed in more detail in the Historical Resource Report, the demolition of existing buildings on the Project Site and the construction of the two proposed buildings would not directly or indirectly cause a change in the significance of a historical resource as defined in Section 15064.5. Therefore, impacts to historical resources would be less than significant.**

## (2) Mitigation Measures

Project impacts to historic resources would be less than significant. Therefore, no mitigation measures would be necessary.

## (3) Level of Significance After Mitigation

Project impacts to historic resources would be less than significant without mitigation.

***Threshold (b): Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?***

## (1) Impact Analysis

The results of the archaeological records search indicate that while there are four historic-era archaeological sites located within a 0.5-mile radius of the Project Site, there are no identified archaeological sites within the Project Site.

With respect to the Zanja Madre, one segment of the zanja network, Zanja No. 1, has been represented on historical maps west of the Project Site and a thorough review of historic sources, including historical documents, academic research, maps, and aerials have not shown Zanja No. 1 to be located within or directly adjacent the Project Site. Furthermore, the Project Site was extensively developed by the early 1950s and has been substantially disturbed as a result. Considering these factors, the potential for buried prehistoric-era and historic-era archaeological deposits to exist within the Project site is considered to be relatively low. Nonetheless, the Project would involve excavation of the Project Site to a maximum depth of approximately 77 feet below grade, and portions of the Zanja Madre or previously unknown archaeological resources could be encountered. As

set forth in Mitigation Measure CUL-MM-1, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The implementation of Mitigation Measure CUL-MM-1 would ensure that any potential impacts related to archaeological resources would be less than significant. **Therefore, with implementation of Mitigation Measure CUL-MM-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and, as such, any potential impacts related to archaeological resources would be less than significant.**

## (2) Mitigation Measures

The following mitigation measure is proposed with respect to archeological resources:

**Mitigation Measure CUL-MM-1:** A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

## (3) Level of Significance After Mitigation

Project-level impacts with regard to archaeological resources would be less than significant with implementation of Mitigation Measure CUL-MM-1.

***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. Furthermore, no known traditional burial sites have been identified on the Project Site. If human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. **With the implementation of regulatory requirements, the Project would not disturb any human remains. Impacts related to human remains would be less than significant.**

### (2) Mitigation Measures

Project impacts related to human remains would be less than significant. Therefore, no mitigation measures would be necessary.

### (3) Level of Significance After Mitigation

Project impacts related to human remains would be less than significant without mitigation.

## **e. Cumulative Impacts**

### (1) Impact Analysis

As provided in Section III, Environmental Setting, of this Draft EIR, there are 74 related projects in the Project Site vicinity. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects include a variety of residential uses (i.e., apartments and condominiums), retail, restaurant, commercial, and office uses, consistent with existing uses in the Project Site area.

#### *(a) Historical Resources*

Cumulative impacts on historical resources evaluate whether impacts of the Project and related projects, when taken as a whole, substantially diminish the number of historical resources within the same or similar context or property type. Related projects in the area, including those nearest the Project Site and study area (i.e., Related Project Nos. 8, 10, 18, 25, 26, and 45), would involve the construction of mid- and high-rise buildings. The



cumulative impacts of mid- and high-rise, mixed-use construction in the study area reflect the changing use in the Arts District as it transitions from industrial to residential and commercial development. The Project area, as a whole, has not been identified as a district representing a period of industrial development in Los Angeles. Collectively, new construction would not further diminish the setting of historical resources in the area substantially more than the pattern of change over time. Furthermore, impacts to historical resources, if any, tend to be site-specific. Of the nearby related projects listed above, Related Project Nos. 10 and 18 were identified in the Historical Resources Report as being the subject of previous historical evaluations conducted in 2016 as part of SurveyLA. However, in both cases SurveyLA did not identify the properties as an individual resource, and they are not located in an area of concentrated resources that would make it a historical district. These two related projects would not materially impair any historical resources because there are none on either of these related project sites. In addition, it is anticipated that historical resources that are potentially affected by other related projects would also be subject to the same requirements of CEQA as the Project. These determinations would be made on a case-by-case basis and the effects of cumulative development on historical resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements.

Cumulative impacts to historical resources must also consider changes within the same historic district. However, the Project Site is not located within the boundaries of a historic district. Additionally, cumulative impacts to historical resources must consider whether a project substantially diminishes the number or significance of historical resources of the same property type, even if they are not otherwise on the related projects list. As discussed above, the Project would have no direct or indirect impacts to historical resources on the Project Site or in the study area. Building C was identified as a potential historical resource by SurveyLA under the theme of Early Industrial Development within the Industrial Development context. This building is being incorporated into the Project, and no alterations are proposed. Therefore, there would be no potential to contribute cumulative impacts to historical resources of the same property type.

**Therefore, Project impacts to historical resources in the Project vicinity would not be cumulatively considerable, and cumulative impacts would be less than significant.**

#### *(b) Archaeological Resources*

With regard to potential cumulative impacts related to archaeological resources, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related

projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering archaeological resources. **Therefore, Project impacts to archaeological resources would not be cumulatively considerable, and cumulative impacts would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Cumulative impacts to cultural resources would be less than significant without mitigation.