

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on cultural resources, including historic and archaeological resources, and human remains. The analysis of historical resources is based on the *Historical Resource Technical Report* (Historical Resource Report) prepared for the Project by GPA Consulting (GPA), December 2020, and included in Appendix E of this Draft EIR. The analysis of potential impacts associated with archaeological resources is based on the *Cultural Resources Inventory for the Angel's Landing Project* (Archaeological Resources Report) prepared for the Project by Dudek, November 17, 2020, and included in Appendix C of this Draft EIR, including the results of an archaeological resources database search provided by the South Central Coastal Information Center (SCCIC) which is included as Attachment B of the Archaeological Resources Report. For an analysis of the impacts of the Project on tribal cultural resources, refer to Section IV.K 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. Historical 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 integrity¹ 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 is 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.² The National Park Service administers the National Register program.

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

¹ *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.*

² *U.S. Department of Interior, National Park Service, National Register Bulletin #16A, How to Complete the National Register Registration Form, 1997.*

significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:³

- 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, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.”⁴ Integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance.”⁵ Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity. They are feeling, association, workmanship, location, design, setting, and materials, and they are defined by National Register Bulletin #15 as follows:⁶

- 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.
- Setting is the physical environment of an historic property.

³ U.S. Department of Interior, National Park Service, *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation*, 1990, revised 2002.

⁴ U.S. Department of Interior, National Park Service, *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation*, 1990, revised 2002, pp. 44–45.

⁵ U.S. Department of Interior, National Park Service, *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation*, 1990, revised 2002, pp. 44–45.

⁶ U.S. Department of Interior, National Park Service, *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation*, 1990, revised 2002, pp. 44–45.

- 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.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- 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 an historic property.

To retain historic integrity, a property will always possess several, and usually most, of the seven aspects of integrity 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 an historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific... property or site is understood and its meaning... is made clear."⁷ A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) were issued by the NPS. The Standards are accompanied by guidelines for four types of treatments for historical resources: Preservation, Rehabilitation, Restoration, and Reconstruction. There are no historical resources on the Project Site. Though none of the four treatments as a whole applies specifically to new construction in the vicinity of historical resources, Standards #9 and #10 of the Standards for Rehabilitation provide relevant, but not determinative, guidance for the potential of a project to impact historical resources. For informational purposes, this section includes an analysis of the Project's conformance with the relevant Standards.

⁷ U.S. Department of Interior, National Park Service, *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation*, 1990, revised 2002, p. 7.

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, nor is it necessary 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.⁸ 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.⁹ The criteria for eligibility for listing in the California Register are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regulatory history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

⁸ *California Public Resources Code Section 5024.1(a).*

⁹ *California State Parks, Office of Historic Preservation, California Register of Historical Resources, http://ohp.parks.ca.gov/?page_id=21238, accessed August 13, 2019.*

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 includes the following:¹⁰

- California properties formally determined eligible for, or listed in, the National Register.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the OHP shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (SHRC).
- Points of historical interest which have been reviewed by the OHP and recommended for listing by the SHRC for inclusion in the California Register in accordance with criteria adopted by the SHRC.

Other resources which may be nominated for listing in the California Register include:

- Individual historical resources.
- Historic resources contributing to the significance of an historic district under criteria adopted by the SHRC.
- Historic resources identified as significant in historical resources surveys, if the survey meets the criteria listed in Subdivision (g).
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the OHP to be consistent with California Register criteria adopted by the SHRC.
- Local landmarks or historic properties designated under any municipal or county ordinance.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with

¹⁰ *California Public Resources Code Section 5024.1(a).*

regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹¹

(iii) Local Designation

The Los Angeles City Council adopted the Cultural Heritage Ordinance¹² in 1962 and amended it in 2018 (Ordinance No. 185472). Ordinance No. 185472 created a Cultural Heritage Commission (Commission) and criteria for designating Historic-Cultural Monuments (HCM). The Commission comprises five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. A proposed HCM may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

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
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.

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

The City of Los Angeles (City) also recognizes historic districts as Historic Preservation Overlay Zones (HPOZ).¹³ 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

¹¹ *California Public Resources Code Section 4852.*

¹² *Los Angeles Administrative Code § 22.171 of Article 1, Chapter 9, Division 22.*

¹³ *Los Angeles Municipal Code § 12.20.3.*

historically or aesthetically by plan or physical development. Contributing resources must meet at least one of the following criteria:¹⁴

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 an historic place or area of historic interest in the City.

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

SurveyLA, the Los Angeles Historic Resources Survey, is the City's first comprehensive program to identify and document properties that appear to be historically significant. 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 and were completed in 2017. The survey results were compiled in report format and posted on the City's Office of Historic Resources' website.

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.

¹⁴ *Los Angeles Municipal Code § 12.20.3.F.3(c).*

(d) City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan includes a Conservation Element (Conservation Element). Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes a policy to continue to protect historical and cultural sites and 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.¹⁵

(e) Central City Community Plan

The Central City Community Plan (Community Plan) includes the following objectives and policies related to cultural resources¹⁶:

- Objective 10-1: To ensure that the arts, culture, and architecturally significant buildings remain central to the further development of downtown and that it remains clearly discernable and accessible to all citizens in and visitors to Los Angeles.
- Objective 10-2: To maintain and reuse one of the largest and most distinguished sets of under used historic buildings in the United States.
- Policies 10-2.1: Clearly designate those historic buildings which should be preserved and prioritized for available funding. Encourage both their rehabilitation and/or adaptive reuse and the development of adjacent available sites.
- Policies 10-2.3: Establish district-specific preservation policies and programs consistent with the goals of each area. Encourage a mix of uses in developing adaptive reuse projects.
- Policies 10-4: Facilitate the construction of parking garages to support new and existing buildings in the Center City, encouraging shared parking between new development and historic buildings.

¹⁵ *City of Los Angeles General Plan, September 2001, Conservation Element, pp. II-6 through II-9.*

¹⁶ *City of Los Angeles Department of City Planning, Central City Community Plan, January 2003, Arts, Culture, and Architectural History, pp. III-16 through III-18.*

(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 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 (Public Resources Code Section 21083.2 and Section 21084.1) and the CEQA Guidelines (California Code of Regulations, 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 OHP, provide guidance regarding procedures to identify such resources, evaluate their importance, and estimate potential effects.

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 California Code of Regulations 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.¹⁷

(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 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 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.¹⁸

(3) Human Remains

(a) California Environmental Quality Act

With regard to human remains, CEQA Guidelines Section 15064.5 addresses consultation requirements if an initial study identifies the existence of, or the probable

¹⁷ U.S. Department of Interior, National Park Service, National Register Bulletin, *Guidelines for Evaluating and Registering Archaeological Properties*, 2000.

¹⁸ City of Los Angeles General Plan, *Conservation Element*, September 2001, pp. II-6 through II-9.

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) California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission within 24 hours (Section 7050.5(c)). The Native American Heritage Commission will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by the Native American Heritage Commission. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

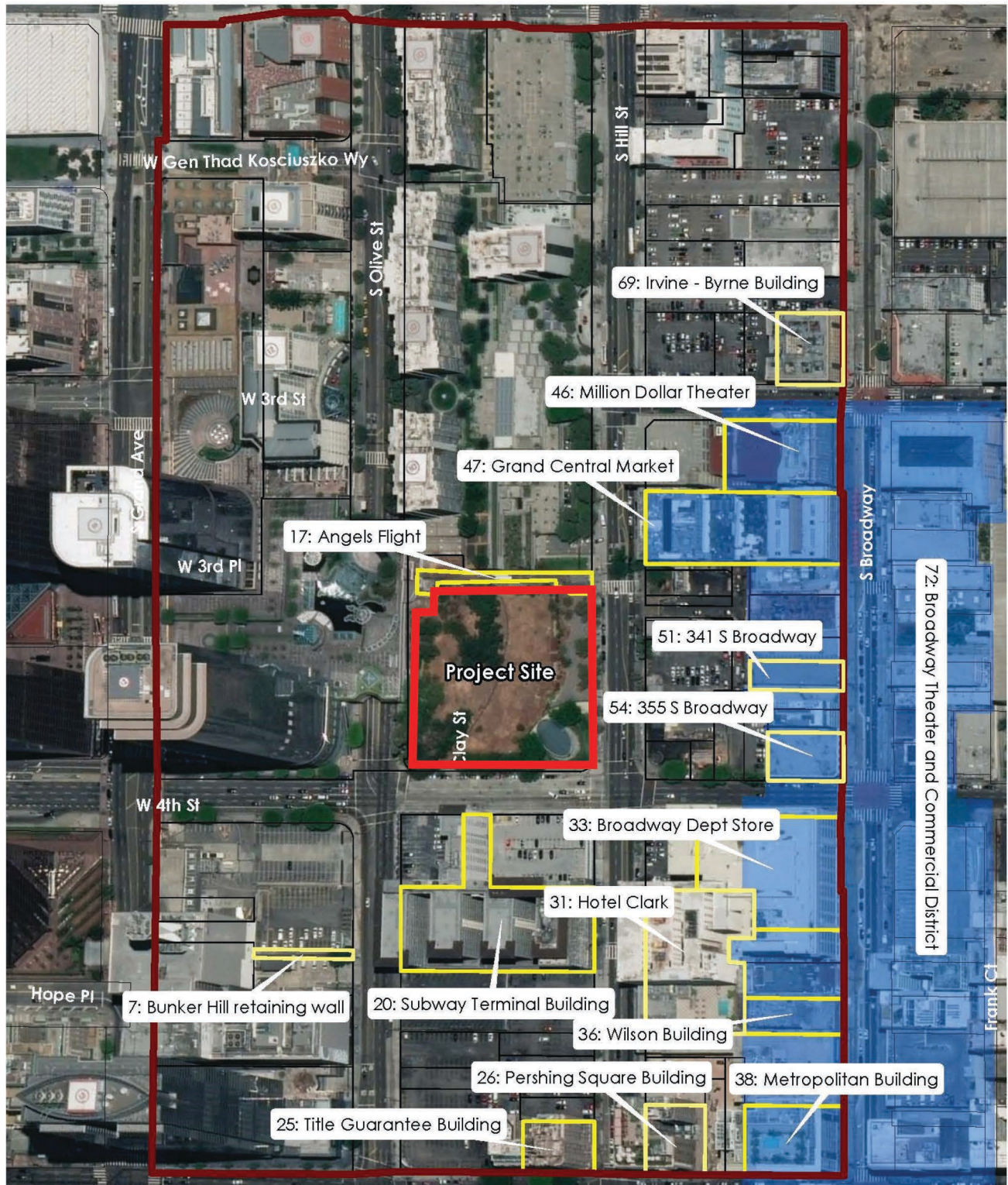
b. Existing Conditions

(1) Historical Resources

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

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

As defined in the Historical Resource Report and shown in Figure IV.B-1 on page IV.B-15, the study area includes the Project Site and city blocks containing buildings and parcels immediately adjacent to, opposite from, or across from the Project Site. The study area surrounding the Project Site is developed with commercial buildings with varying ages and heights and several parking structures and surface parking lots. The study area and Project Site are located on the boundary between Bunker Hill and the Historic Core neighborhoods of the Central City Community Plan Area of Downtown Los Angeles.



- Project Site
- Study Area Outline
- Individually Listed and Potential Historical Resources
- Broadway Theater and Commercial District



True North



Project North

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

The Historic Core is located east of the Project. It was developed as the central business district of Los Angeles in the early 1900s. This area includes a concentration of former banks, department stores, theaters, and other commercial uses that date largely to the 1910s and 1920s, many of which are designed in an embellished Beaux Arts style. Surviving buildings from the 1910s and 1920s are mid-rise buildings constructed to the City's one-time height limit of 150 feet (roughly 13 stories).

The Bunker Hill area is located west of the Project Site and was one of the oldest residential neighborhoods in Los Angeles until it became a major redevelopment project of the Community Redevelopment Agency of Los Angeles (CRA) in the 1960s. Bunker Hill is now a mixed-use neighborhood of office towers, hotels, multi-family residential complexes, and cultural institutions arranged across 25 superblocks (extending beyond the study area). Almost all the buildings in Bunker Hill are high-rises sited on large parcels with setbacks that open onto public plazas. The area has a varied topography and many of the streets feature multiple levels and separation of grade. An elevated pedway network, which consists of above-grade pedestrian corridors, bridges, and stairwells, links several key buildings and sites in Bunker Hill. Olive Street, west of the Project Site, is a covered underpass below the pedway of California Plaza, a superblock development of multiple cultural institutions and high-rise office towers. California Plaza was constructed between 1983 and 1985.

The Project Site was developed with residential buildings, primarily single-family residences, in the late nineteenth century. By the early twentieth century, the western portion of the Project Site along Olive Street was developed with apartment hotels and boarding houses. The Project Site was bisected by Clay Street, which no longer exists. East of Clay Street, below the hill, were commercial buildings.

The Project Site was acquired by the CRA as part of the Bunker Hill Redevelopment Project, with all buildings on the Project Site demolished between 1963 and 1964. An irregularly shaped parking lot was then added to the western portion of the Project Site, at the base of the hill in 1965. The site west of the parking lot was then graded into a "temporary park" in 1984. Neither the parking lot nor the temporary park are in use.

The Project Site is not currently listed under national, state, or local landmark or historic district programs, and is not included as significant in any historic resource surveys of the area, including SurveyLA. Based upon GPA's field inspection and research, and due to a lack of age or architectural character, the Project Site does not appear to meet the eligibility standards for the *Cultural Landscapes, 1875-1980* context formulated for the *Los Angeles Citywide Historic Context Statement*. In addition, no landscape designer was listed on the building permits for the Project Site, and the identified civil engineering firm of Mollenhauer, Higashi & Moore of 453 S. Spring Street is not recognized as master designers, builders, or architects. The Project Site is not the work of a master designer,

builder, or architect nor does it embody the distinctive characteristics of a style, type, period, or method of construction. As such, the Project Site was excluded from analysis as a potential historical resource.

(b) Historical Resources in the Vicinity of the Project Site

As shown in Figure IV.B-1 on page IV.B-15, the Historical Resources Report included a review of surrounding properties generally one block north, east, and south of the Project Site (study area) to identify listed and potential historical resources. Within the study area, 72 properties were studied, of which 15 were found to contain potential or designated historical resources.

Among the historical resources found in the study area is the Broadway Theater and Commercial District (Historic District), a historic district located one-half block east of the Project Site along Broadway that is generally bounded by W. 3rd Street and W. 9th Street. The Historic District was listed on the National Register in 1979, and its boundaries were expanded in 2002. It is made up of commercial and entertainment buildings constructed between 1894 and 1931 and is significant for both its representation of an important era of commercial activity in Los Angeles and for its concentration of important examples of architectural styles. The buildings within the Historic District exhibit a variety of architectural styles, including Beaux Arts, Art Deco, and Moderne. The Project Site does not share a boundary with the Historic District, however, there are eight buildings located within the study area that are contributors to the Historic District as indicated in Table IV.B-1 on page IV.B-18. Three of the contributors are also individually listed as HCMs and/or the National Register. In addition to the contributing buildings to the Historic District, there are four buildings and one structure (Angels Flight) in the study area that are individually listed as HCMs and/or individually listed in the National Register and/or California Register, and one structure (Bunker Hill Retaining Wall) that is identified as a potential historical resource. The potential and designated historical resources in the study area are listed in Table IV.B-1. Detailed descriptions of each identified historical resource are provided in the Historical Resource Technical Report.

(2) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. On April 30, 2018, a cultural resources records search was conducted through the SCCIC located at the California State University, Fullerton. The results of the records search, which are included in the Archaeological Resources Report, Appendix C of this Draft EIR, indicate that nine archaeological resource finds have been recorded within a 0.5-mile radius of the Project Site and none of the nine resources intersect or overlap the Project Site. The nine archaeological sites include eight historic-era sites and one prehistoric site. As further discussed in the Section IV.K., Tribal Cultural

**Table IV.B-1
Historical Resources in the Study Area**

Map No.^a	Resource Name and Address	APN	Year Built	Status
7	Bunker Hill Retaining Wall S Olive St. (in parking lot)	N/A	ca. 1902	Potential historical resource identified by SurveyLA.
17	Angels Flight S Hill St.	N/A	No Record	HCM #4; Listed on NR in 2000.
20	Subway Terminal Building 417 S. Hill St.	5149-027-020	1926	HCM #177; Listed on NR in 2006.
25	Title Guarantee & Trust Building 411 W. 5th St.	5149-028-015	1930	HCM #278; Listed on NR in 1984.
26	Pershing Square Building 448 S. Hill St.	5149-026-004	1924	Eligible for listing on the NR; Listed on the CR
31	Hotel Clark 426 S. Hill St.	5149-025-008	1913	Eligible for listing on the NR; Listed on the CR
33	Junipero Sera Office Building/ Broadway Department Store 320 W. 4th St.	5149-025-901	1914	Contributor to the Broadway Theater and Commercial District
36	Wilson Building 431 S. Broadway	Yes	No Record	Contributor to the Broadway Theater and Commercial District
38	Metropolitan Building 449 S. Broadway	5149-026-001	1913	HCM # 1019; Contributor to the Broadway Theater and Commercial District
46	Million Dollar Theater 306 W. 3rd St.	5149-015-026	1918	Listed on NR in 1978; Contributor to the Broadway Theater and Commercial District
47	Grand Central Market 315 S. Broadway	5149-015-025, 5149-015-033	1898	Contributor to the Broadway Theater and Commercial District
51	341 S. Broadway	5149-015-020	1888	Contributor to the Broadway Theater and Commercial District
54	355 S. Broadway	5149-015-023	1902	Contributor to the Broadway Theater and Commercial District
69	Irvine Block-Byrne Building (Pan American Lofts) 249–253 S. Broadway	There are 40 APNs associated with this address	1897	HCM #804; Contributor to the Broadway Theater and Commercial District
72	Broadway Theater and Commercial District Along Broadway between W. 3rd Street and Olympic Boulevard		1894-1931	Historic District; Listed on NR in 1979, boundaries expanded in 2002

Table IV.B-1 (Continued)
Historical Resources in the Study Area

Map No.^a	Resource Name and Address	APN	Year Built	Status
<p><i>CR = California Register</i> <i>HCM = Historic Cultural Monuments</i> <i>NR = National Register</i> ^a <i>Map No. correspond to the numbers shown in Figure IV.B-1 on page IV.B-15.</i> <i>Source: GPA Consulting, August 2019.</i></p>				

Resources, of this Draft EIR, the single prehistoric site consists of a prehistoric burial (P-19-120015).

A segment of a Spanish and Mexican era water conveyance system known as the Zanja Madre may be present within the vicinity of the Project Site. The Zanja Madre network and subsequent additional Zanja segments were Los Angeles' original irrigation system, which is thought to have run throughout the City in various branches, predominantly along major roads.¹⁹ The location of many of the segments are unconfirmed; however, the believed route has been mapped by Blake Gumprecht, who incorporated information from multiple historical works, particularly a report on irrigation by State Engineer William Hamilton Hall. Using Gumprecht's 2001 work, Cogstone Environmental prepared a series of maps for the Downtown Los Angeles area (see Attachment B²⁰ of the Archaeological Resources Report included as Appendix C of this Draft EIR). The maps depict one unconfirmed segment of the Zanja network, Zanja No. 8, mapped to the east and south of the Project Site. Specifically, the Cogstone map for the Downtown Los Angeles area depicts Zanja No. 8 running northeast to southwest, then east to west, before rerouting to northeast to southwest. The nearest Zanja segment has been mapped more than 600 feet away from the Project Site, running southwest through the block to the south. Although the Project Site is relatively close to Zanja No. 8, none of the previous monitoring projects or other studies have resulted in the recordation of any surviving segment of Zanja No. 8 within the records search area. Given that the mapped location of Zanja No. 8 is outside of the Project Site and that it has not been identified through previous monitoring efforts, the greatest likelihood is that this Zanja segment has been destroyed. Additionally, the Project Site has been extensively developed throughout

¹⁹ The term "Zanja," translating as "ditch" in English, refers to the open earth features that were used during early Euro-American habitation of this area to transport water.

²⁰ Appendix B is a confidential portion of the Cultural Resources Report. Appendix B, on file at the City of Los Angeles Planning Department, is available for review by qualified individuals (e.g., certified archaeologists, etc.).

the twentieth century. The potential of encountering segments of the Zanja network during ground disturbing activities associated with the Project is considered low.

3. Project Impacts

a. Thresholds of Significance

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

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

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

Threshold (c): Disturb any human remains, including those interred outside of 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 criteria to evaluate impacts to cultural resources:

(1) Historical Resources

If the project would result in a substantial adverse change in the significance of an historical resource due to:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the Project Site or in the vicinity.

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.²¹ 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.²²

(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;
 - 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-old²³ 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 Historical Resource Report provided in Appendix E of this Draft EIR is based, in part, on a field inspection of the Project Site, historic permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, local histories, and a review through an SCCIC records search of the CHRIS database, including a review of the National Register and its annual updates, the California Register, and the City of Los Angeles' inventory of historic properties to identify any previously recorded properties within or near the Project Site. Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site

²¹ CEQA Guidelines, Section 15064.5(b).

²² CEQA Guidelines, Section 15064.5(b)(1).

²³ 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.

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.

To address potential impacts to archaeological resources, formal records searches were conducted by the SCCIC, included as an attachment in the Archaeological Resources Report, in Appendix C of this Draft EIR, to assess the archaeological sensitivity of the Project Site and vicinity. These record searches covered a 0.5-mile radius around the Project Site, within the Hollywood and Los Angeles USGS 7.5-minute quadrangle and included reviews of all recorded archaeological and built-environment resources, as well as a review of cultural resource reports on file. Databases reviewed included the California Points of Historical Interest, California Historical Landmarks, California Register, National Register, California State Historic Properties Directory, and the City of Los Angeles HCMs. 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 undertaken to determine the potential for uncovering archaeological resources.

c. Project Design Features

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

d. Analysis of Project Impacts

Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

(1) Impact Analysis

(a) Direct Impacts

The Project is a new mixed-use development that includes an integrated mix of residential, hospitality, museum, and commercial uses. The Project would also provide private and public open spaces. The Project would result in up to 1,269,150 square feet of floor area with a maximum floor area ratio (FAR) of up to 13:1. The Project would require excavation up to approximately 70 feet below the ground surface as measured from the surface elevation of Hill Street adjacent to the Project Site. It is estimated that approximately 334,000 cubic yards of export material would be hauled from the Project Site during the excavation phase. The existing Los Angeles County Metropolitan Transportation Authority (Metro) B and D Lines Pershing Square Station portal would be maintained on-site.

As discussed in the Historical Resource Report, there are no historical resources on the Project Site and no historical resources would be demolished, destroyed, relocated, or altered as a result of the Project. In addition, as evaluated in Section IV.G, Noise, of this Draft EIR, the estimated vibration velocity levels from all construction equipment would be below the building damage significance thresholds at the nearby off-site historical resources. **Therefore, potential direct impacts to historical resources as a result of development of the Project would be less than significant.**

(b) Indirect Impacts

As discussed above, there are 15 known or potential historical resources in the study area, including the Broadway Theater and Commercial District. In determining the potential indirect impacts of adjacent new construction on the historical resources in the study area, the central question is whether the Project would cause a "material impairment" to the significance of the nearby historical resource such that a substantial adverse change would occur.²⁴ Material impairment occurs when 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, as result of the Project, the historical resources in the study area no longer retained sufficient integrity to convey their significance.

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 impact of the proposed 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. This analysis considers whether the integrity of setting of the historical resources in the study area would be so diminished by the new construction that they would no longer qualify as historical resources under national, state, or local landmark or historic district programs.

The Project Site is currently vacant; its hillside is an undefined gateway between the Historic Core and the high-rise development of Bunker Hill. As a whole, the study area around the Project Site generally does not reflect a historic setting due to the decades of changes caused by demolition and new construction in the Historic Core and Bunker Hill. This demolition included the buildings previously on the Project Site and previously constructed adjacent to Angels Flight. Historically, the now-demolished buildings on the

²⁴ Pub. Res. Code § 21084.1; 14 CCR §15064.5(b).

Project Site contributed to a setting of dense, hillside urban development. By constructing the Project on this currently vacant site, the Project will return the Project Site to a developed state, which more closely resembles the historic setting of the area when the historical resources in the Historic Core were constructed.

The historical resources in the study area to the east and south are separated from the Project Site by Hill Street and W. 4th Street. In most instances, the Project Site is also separated from historical resources by intervening non-historical buildings and parking lots. The historical resources in the vicinity include 12 buildings, a retaining wall, a funicular railway (Angels Flight), and one historic district (Broadway Theater and Commercial District). With the exception of Angels Flight, discussed more below, the Project Site is located across the street, and separated by other structures, buildings, and landscape features from historical resources. The spatial relationships between the historical resources would remain intact and would not be changed by the Project. The Project is physically separated from all historical resources across 4th Street and Hill Street. In addition, the Project is further physically separated from the contributing buildings of the Broadway Theater and Commercial District that are oriented toward Broadway.

Furthermore, the proposed Project would not affect the number of buildings in the Historic District, the ratio of contributing to non-contributing buildings, or the relationships between the Historic District's other significant features. Although the Project introduces a new visual element to the area west of these historical resources, the relationships between the contributing buildings, other significant features, and surrounding streets would remain largely intact. These relationships are characterized by density. The Project would not have an adverse impact on the physical characteristics that convey the resources' historic significance and justify their inclusion in, or eligibility for, applicable landmark and historic district designation programs.

The Project has the potential to modify certain views of historical resources in the study area from the Project Site. The topography of the Project Site creates a natural viewing platform for buildings sited at the lower elevations of the Historic Core. However, the Project Site is not accessible to the public, except for the stairs adjacent to Angels Flight and the pedestrian access to the Metro portal. While the existing views may be modified by the Project, these views are not a characteristic that conveys historical resources' significance. To maintain views of the Historic Core from the higher elevations along the Project Site, the design includes several open space plazas and terraces whereby views towards the Historic District would be visible. Moreover, the Project develops podium spaces (indoor and outdoor) and two high rise towers that would enhance views, and create new unobstructed views, toward the historical resources in the Historic District and the Historic Core. The historical resources in the Historic District are not constructed with primary elevations oriented towards the Project Site. Furthermore, none of the views of historical resources along Hill Street and Broadway would be diminished as

a result of the Project. Therefore, the historical resources to the east and south of the Project Site would remain highly visible and continue to be prominent features of the surrounding blocks.

The Project would introduce a new visual element next to Angels Flight. The overall integrity of setting for this area is low as a result of substantial changes to the built environment over time. Angels Flight is located immediately north of the Project Site, adjacent to the northern property line. This is not the original location of the historical resource. Angels Flight was relocated to its current location in 1995. The original setting was several blocks away from the Project Site. In its original setting, Angels Flight passed between a narrow corridor of commercial buildings on an elevated track, and there were no accompanying pedestrian stairs. The setting of Angels Flight adjacent to the vacant Project Site is currently more bucolic than its original historic setting. The historic setting of Angels Flight has also been diminished by demolition of the commercial buildings along the southern slope of the hill that Angels Flight originally connected. In this sense, the Project would return some of the urban density and original context to the setting of Angels Flight. The Project would also improve the pedestrian experience adjacent to Angels Flight by widening the stairway and developing intimate outdoor spaces between the buildings on the Project Site and Angels Flight. The Angels Flight historical resource would continue to operate as a pedestrian and passenger facility between Bunker Hill and the Historic Core.

Proposed construction adjacent to Angel's Flight was also reviewed with regard to conformance with the Secretary of Interior Standards. Rehabilitation Standards #9 and #10 address related new construction, which are relevant but not determinative in analyzing the potential impact of a new building on a historic property. Rehabilitation Standards #9 and #10 primarily address additions to historic buildings or new construction within the boundaries of a historic property or district, which is most applicable in the case of the Project.

Standard #9 states: "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." Angels Flight is not part of the Project or the Project Site; however, the legal lot that contains Angels Flight is adjacent to the legal lot that comprises the Project Site. The existing concrete staircase on the Project Site runs generally parallel to the south of the parcel that contains Angels Flight. The Project would not destroy the historic materials, features, or spatial relationships of this historical resource.

The concrete staircase (constructed c. 1995) to the south of Angels Flight would be modified as part of the Project and would be substantially wider than the staircase

constructed around 1995 when Angels Flight was relocated to its current location. The spatial relationship between Angels Flight and the staircase, which dates to 1995, is not historic and would not be altered by the Project. Instead, the Project would retain the basic spatial relationship of pedestrian staircase adjacent to Angels Flight. In addition, the Project re-introduces an aspect of the historic spatial relationship between Angels Flight and its urban setting. Though differentiated by modern materials, size, and scale, Tower A is intentionally placed on Hill Street, near the lower station of Angels Flight, much like the historic buildings that were the funicular's immediate neighbors in the past. This spatial relationship would be closer to the historic spatial relationship of Angels Flight when the funicular ran alongside buildings.

In addition, Tower A would not be full height for the full length of Angels Flight. At the upper portion of the track, Tower A would step down to the Terrace, two stories below the upper station of Angels Flight. The northwest end of Tower A would be set back approximately 125 feet from California Plaza, providing space and relief for the upper station of Angels Flight, and allowing views for riders at the top through the Project's open space and to the City beyond. Along the track at most floors, Tower A would feature windows facing Angels Flight. Toward the top, hotel rooms with balconies would face the track. Tower A would provide interaction and view between the building and the riders, as existed in the original configuration of the funicular. At the street level along Hill Street, the retail storefronts and restaurants would be set back from the Hill Street sidewalk near the lower station entrance. This, combined with the stairway widening and storefront setbacks, would open views to the lower station of Angels Flight for those walking along Hill Street and would provide a queuing area at the lower station.

The Project's materials, features, size, scale and proportion, and massing cannot directly be characterized as compatible with the historical resources of the Historic Core. However, the majority of those properties are not located adjacent to the Project Site. In addition, the existing setting and context of the study area includes the high-rise towers of Bunker Hill. These buildings are juxtaposed with the lower rise buildings of the Historic Core. This contrast between size, scale, massing, and spatial relationships between the Historic Core and Bunker Hill has existed for many decades and is part of the character of the setting around the Project Site. The Project would merely continue a long trend, introducing a high-rise tower set among the existing high-rise towers in Bunker Hill. It should also be noted that with this particular aspect of Standard #9, compatible design is less important for new construction when it does not alter historic physical features of or change the relationships between historic buildings, and the Project would impact neither. Therefore, the Project would comply with Standard #9 because it would not diminish the integrity of the historical resources in the study area.

Standard #10 states: "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.” The proposed new buildings are separated from Angels Flight and other historical properties in the study area. If the new buildings were removed in the future, Angels Flight, the only adjacent historical resource to the Project Site, would not be materially affected. The essential form and integrity of Angels Flight and its immediate environment would be unimpaired. Thus, the Project complies with Standard #10.

Based on the above, the Project would not result in a substantial adverse change to the immediate surroundings of nearby historical resources, to the degree that they would no longer be eligible for listing under national, state, or local landmark or historic district programs. As such, impacts would be less than significant and no mitigation measures are required.

(2) Mitigation Measures

There are no Project-level impacts to historical resources. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

There are no Project-level impacts to historical resources. Therefore, no mitigation measures are required.

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

(1) Impact Analysis

As discussed in detail in the Archaeological Resources Report, no archaeological resources have been identified within the Project Site through the CHRIS records search, NAHC SLF review, or intensive-level pedestrian survey. As discussed above, nine archaeological sites, including eight historic era-sites and one prehistoric site have been recorded within 0.5 mile of the Project Site. The single recorded prehistoric site consists of a prehistoric burial 0.5 mile northeast of the Project Site. This occurrence is well outside the limits of the Project Site or any related construction activities that would occur in connection with the Project. In addition, the Project Site was substantially disturbed by grading and development mainly during the 1960s and 1970s. These activities reduce the likelihood that known archeological resources remain are on the Project Site.

Additionally, as discussed above, the SCCIC records did not identify any previous studies that have documented remnants of the Zanja network within the Project Site. Although the Project Site is located within 600 feet of a mapped segment of Zanja No. 8,

crossing the block to the south from east to west, none of the previous monitoring projects or other studies completed in this area have resulted in the recordation of any surviving segment of Zanja No. 8. Given that the mapped location of Zanja No. 8 is outside of the Project Site and that it has not been identified through previous monitoring efforts, the greatest likelihood is that this Zanja segment has been destroyed. Additionally, the Project Site has been previously graded and developed. The potential of encountering segments of the Zanja network during ground disturbing activities associated with the Project is considered low.

Based on the records searches, field reconnaissance, and analysis of historical era activity in the surrounding area, the sensitivity for this Project Site indicates that the Project would not reasonably result in a foreseeable direct or indirect impact to an archeological resource. Notwithstanding, excavations on the Project Site would extend down to as much as 70 feet below the ground surface, so Project excavations could potentially encounter unknown and unanticipated archaeological resources and human remains. In that case, the City typically applies conditions of approval to projects that disturb soil to ensure that impacts to unknown archaeological resources would be less than significant in the event of inadvertent discovery.

Therefore, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 and no mitigation measures are required.

(2) Mitigation Measures

As discussed above, the Project Site does not contain any known archaeological resources. No mitigation is required.

(3) Level of Significance After Mitigation

Project-level impacts 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 be less than significant.

Threshold (c): Disturb any human remains, including those interred outside of formal 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. One prehistoric burial site (P-19-120015) was previously recorded

approximately 0.5 mile northeast of 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. Specifically, no further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the Project Site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. **With the implementation of regulatory requirements, the Project would not disturb any human remains. Impacts related to human remains would be less than significant, and no mitigation measures are required.**

(2) Mitigation Measures

Project-level impacts related to the disturbance of human remains would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the disturbance of human remains would be less than significant without mitigation.

e. Cumulative Impacts

As indicated in Section III, Environmental Setting, of this Draft EIR, there are a total of 50 related projects in the vicinity of the Project Site. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in close proximity to the Project Site (e.g., Related Project Nos. 1 through 5). Collectively, the related projects near the Project Site involve a mix of light industrial, commercial, and residential uses, consistent with existing uses in the vicinity of the Project Site.

(1) Impact Analysis

(a) Historical Resources

As noted above, several other developments are proposed in the vicinity of the Project Site and the closest related projects are Related Project Nos. 1 and 2. Related Project No. 1, Equity Residences is located across Hill Street from the Project Site. The City determined that this Project would not result in significant direct or indirect impacts to historical resources.²⁵ Related Project No. 2, Fifth and Olive, is under construction and is separated from the Project Site by existing high-rise buildings. The City also determined that Related Project No. 2 would not result in any significant impacts to historical resources.²⁶ CEQA Guidelines Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The Project has not been shown to have either a direct or an indirect impact on historical resources; nor were any historical resources impacts identified at either of the two closest related projects. Therefore, the Project would not result in a cumulative impact to any historical resources and cumulative impacts to historical resources would be less than significant.

(b) Archaeological Resources

With regard to potential cumulative impacts related to archaeological resources, such potential impacts are generally site specific as they relate to the particular underlying conditions of a site. Notwithstanding, the vicinity of the Project Site is highly urbanized and has been disturbed and developed over time. As indicated above, no known archaeological resources are located within the Project Site and implementation of Mitigation Measure MM-CUL-1 would address potential impacts associated with inadvertent discovery of archaeological resources. Each related project would be required to comply with applicable regulatory requirements that address archaeological resources, including CEQA Guidelines Section 15064.5, PRC Section 21083.2, Health and Safety Code Section 7050.5, and PRC Section 5097.9, as well as any site-specific mitigation identified for that related project. **Therefore, Project impacts to archaeological resources would not be cumulatively considerable, and cumulative impacts would be less than significant.**

²⁵ *Sustainable Communities Environmental Assessment (SCEA) for the 340 S. Hill St. Equity Residential Mixed-Use Project, September 2019.*

²⁶ *City of Los Angeles, Department of City Planning, 5th and Hill Draft EIR, November 2018.*

(c) Human Remains

As with the potential for uncovering archaeological resources, the potential for discovering human remains is site specific based on the underlying conditions and historical uses of that site. Notwithstanding, like the Project, if human remains were discovered during construction of any of the related projects, 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. **Therefore, with the implementation of regulatory requirements, cumulative impacts related to human remains would be less than significant.**

(2) Mitigation Measures

Cumulative impacts to historical and archaeological resources and those related to the disturbance of human remains would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts to historical and archaeological resources and those related to the disturbance of human remains would be less than significant without mitigation.