

IV. Environmental Impact Analysis

I.2. Cultural Resources—Archaeological Resources

1. Introduction

The following section addresses the potential for the Proposed Project to affect archaeological resources that have the potential to be present within the Project Site. This section is based on the *Archaeological Resource Inventory and Impact Assessment Technical Report* (Archaeological Assessment), prepared by Statistical Research, Inc. (SRI) in October 2011 and provided in Appendix T of this Draft EIR.

2. Environmental Setting

a. Regulatory Setting

Various federal, state, and local regulations govern archaeological resources, including the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), the California Environmental Quality Act (CEQA), and the City of Los Angeles General Plan Conservation Element. For the purposes of this Draft EIR, the most relevant regulations involve evaluation of the significance of archaeological resources, and mitigation under CEQA if significant archaeological resources may be adversely impacted by a project. These regulations are provided in Appendix G of this Draft EIR.

b. Cultural Setting and Development History

While little is known about the prehistory of the Project vicinity, regional information can be used to understand the prehistory of the area. Native settlement and archaeological chronology for the regional Coastal Southern California and the Los Angeles Area can be divided into the following periods: Paleocoastal (as early as 12,000 B.P.¹); Millingstone (8,500–3000 B.P.); Intermediate (3000–1000 B.P.); Late (1000 B.P.–A.D. 1542); and Protohistoric and Early Historical (Mission) (A.D. 1542–1771).

¹ Before Present: Defined as the number of years before 1950 when using radiocarbon dating.

As discussed in detail in the Archaeological Assessment, archaeological sites within the greater region provide documentation of the cultures that existed during each of these periods. By the Late Period and through the Protohistoric and Early Historical Periods, the Gabrielino/Tongva can be placed within the downtown area. Specifically, the Gabrielino/Tongva Ya'angna village, dating partially to the Late Period, is considered by some to be the original site of Los Angeles and the documented site of LAN-1575 is believed to represent the remains of the village. There are other important archaeological sites in the greater downtown area that offer insights and a more detailed understanding of the prehistory and early history of the original Pueblo of Los Angeles and its subsequent expansion and development. These include: Los Angeles Chinatown, where remains of an early Chinese community from the 1880s were found; LA Plaza de Cultura y Artes within the original pueblo area of downtown Los Angeles; the Los Angeles Cathedral project, where Native American remains and historical period remains were found; and Zanja Madre, the original system of canals associated with the establishment of the Pueblo of Los Angeles in 1781.

Following the Protohistoric and Early Historical period, the industrialization of Los Angeles near the end of the nineteenth century initiated an influx of working class individuals into the region. Maps from 1888 depict multiple residential buildings on the northeast side of the Project Site along West Eleventh Street as well as south of West Pico Boulevard. Beginning in 1906, maps of the Project Site depict a growing commercial and industrial presence including the Los Angeles Interurban Railway Electric Car House and the Los Angeles Interurban Power House. Although a small residential presence remained, by the 1910s development on the Project Site was heavily influenced by growing automobile ownership as indicated by numerous auto sales and service shops located along Figueroa and Trenton Streets (no longer extant). Similarly, the Harbor Freeway was constructed in the early 1950s immediately adjacent to the Project Site to accommodate this increasing automobile culture.

Today, the neighborhood that encompasses the Project Site, now known as South Park (the southern portion of downtown), has undergone a significant amount of recent redevelopment, including the Los Angeles Convention Center (Convention Center) in 1971, STAPLES Center in 1999, L.A. LIVE in 2007, and numerous other facilities including restaurants and high-rise condominiums. These changes have resulted in the transformation of the Project Site from its residential and industrial origins to a more modern, upscale retail-and entertainment- oriented landscape.

c. Existing Site Conditions

The Project Site is located in the downtown area of the City of Los Angeles, on an approximately 68-acre site owned by the City upon which the Convention Center, the Bond

Street Surface Parking Lot, the Cherry Street Garage and STAPLES Center are constructed. The Project Site also includes certain additional areas comprising the airspace and certain right-of-way on Pico Boulevard, L.A. Live Way and Bond Street, and an air space over 12th Street. The Project Site is generally bounded by the following major roadways: the I-110 Harbor Freeway to the west; Chick Hearn Court to the north; Figueroa Street to the east; and Venice Boulevard to the south.

SRI archaeologists conducted an intensive archaeological pedestrian survey (Survey) of the Project Site on July 15, 2011. The Survey focused on the search for archaeological remains. Historical-period buildings are addressed separately in Section IV.I.1, Historical Resources, of this Draft EIR.

As verified by the Survey, the majority of the Project Site has been graded and is covered by modern development. Existing structures include the Convention Center West Hall, South Hall, and Concourse Building and their associated parking structures; STAPLES Center; and the Cherry Street Garage. All of these structures have either deep foundations or subterranean levels which provide low archaeological potential due to previous construction and disturbance. Other modern features in the immediate area include Pico Boulevard, L.A. Live Way, Figueroa Street, and Venice Boulevard, as well as their associated sidewalks and infrastructure. Thus, the archaeological potential of these areas is also low. The Survey identified four less-developed areas within the Project Site including the Bond Street Parking lots along L.A. Live Way, the area between the Cherry Street Garage and the I-110 Harbor Freeway, the landscaped open space area at the northwest corner of the Project Site, and the parking lots northwest and northeast of the Convention Center West Hall. Although some of these areas are covered by asphalt parking lots, there does not appear to be deep foundations or subterranean garages in these areas. Therefore, these areas have the potential to retain some archaeological sensitivity. These areas identified as having higher potential archaeological sensitivity constitute approximately seven percent of the Project Site. An aerial photograph of these areas of the Project Site that have the potential for archaeological sensitivity is provided in Figure IV.I.2-1 on page IV.I.2-4.

As discussed in more detail under the methodology section below, a records search was completed on July 14, 2011, at the South Central Coastal Information Center (SCCIC) to assess existing conditions within the Project Site and vicinity. According to the SCCIC records, within the 0.5-mile search radius, there are 69 historical-period resources that have been formally designated as historic buildings or districts on the National Register of Historic Places (NRHP) or as Los Angeles Historic Cultural Monuments. In addition to the designated historic buildings and districts, there are 14 historical-period resources that have been recorded and are on file with the SCCIC. Of these, 13 are historical-period buildings which are further discussed in Section IV.I.1 and one is a historical-period



Source: Statistical Research, Inc. 2011.



Figure IV.I.2-1
 Portions of the Project Site
 with possible Archeological Sensitivity

archaeological site (Site 19-003287) located to the north of the Project Site within the 0.5-mile investigation radius. The archaeological site contains five historical-period domestic refuse deposits including glass bottles, jars, and ceramics with most dating from 1900 to the 1920s. The earliest artifact dates to 1847, and the latest dates to 1976. The records do not indicate whether the NRHP eligibility of this site has been determined.

SCCIC records also indicate that the Project Site has been subject to five previous cultural resource investigations. In addition, more than 40 investigations have been conducted within a 0.5-mile radius of the Project Site. With the exception of 19-003287, discussed above, no archaeological resources were reported in the vicinity of the Project Site. Furthermore, no prehistoric sites have been identified within a 0.5-mile radius of the Project Site.

3. Environmental Impacts

a. Methodology

Archaeology is the recovery and study of material evidence of human life and culture of past ages. Because, over time, this material evidence becomes buried, fragmented, or scattered or otherwise hidden from view, it is not always evident from a field survey of a project site. Thus, the possible presence of archaeological materials must often be determined based upon secondary indicators. These include the presence of geographic, vegetative, and rock features which are known or thought to be associated with early human life and culture, as well as knowledge of events or material evidence in the surrounding area.

The Archaeological Assessment by SRI included as Appendix T, involved a comprehensive search of existing California Historical Resources Information System (CHRIS) and SCCIC records for a 0.5-mile radius surrounding the Project Site, archival research pertaining to the history of land use in the Project Site and its immediate vicinity, and a pedestrian survey of the Project Site. In addition to the CHRIS, several other resource databases and archives were consulted, including California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, the California State Historic Resources Inventory, Los Angeles Historical Cultural Monuments, and historic map files.

The archival research integrated several types of data, including typical prehistoric land-use patterns, historical records, historical maps, historical photographs, and aerial photographs. Based on these sources of data, the Archaeological Assessment of the Project Site evaluated the likelihood of intact prehistoric archaeological resources to be present within the Project Site.

Pursuant to Government Code Section 65352.3 (SB 18), the City of Los Angeles Department of City Planning (Planning Department) contacted the Native American Heritage Commission (NAHC) to identify California Native American Tribes to be consulted regarding the potential effect of the Proposed Project. The NAHC responded and the tribes were consulted. In addition, the NAHC conducted a search of the Sacred Lands File, which stated that no known Native American cultural resources were identified within the Project Site.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to cultural resources. These questions are as follows:

Would the project:

- Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries?

In the context of the above questions from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;

- Is at least 100-years old (or National Register) and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

These factors established by the City of Los Angeles reflect the intent of the California Register of Historical Resources criteria and address the criteria established for defining unique archaeological resources as set forth in CEQA, with one exception. As such, the following is also used to assess the potential significance of a unique archaeological resource:

- Involves important research questions that historical research has shown can be answered only with archaeological methods.

Based on the above, the Proposed Project would have a significant impact on archaeological resources if:

- Project activities would disturb, damage, or degrade a unique archaeological resource or an archaeological historic resource, or setting of the resource.

c. Project Design Features

No project design features are proposed with regard to archaeological resources.

d. Project Impacts

(1) Project Construction

(a) Archaeological Resources

As discussed in the Archaeological Assessment, there are no recorded archaeological sites within the Project Site or vicinity. In addition, no prehistoric archaeological sites or isolated cultural resources were discovered within the Project Site boundaries during recent site surveys. However, numerous historic buildings once stood on the Project Site and many still stand in the surrounding 0.5-mile radius. The majority of the historic buildings within the Project Site were demolished prior to the construction of the Convention Center in 1971. Furthermore, as described above, the majority of the Project Site has a very low potential for preservation of buried archaeological resources, as large buildings with deep foundations and subterranean structures cover most of the area today. Excavation and grading for these below-grade architectural structures would have

destroyed any archaeological resources that may have been present after demolition of the historical-period buildings.

As shown in Figure IV.I.2-1 on page IV.I.2-4, the western and northern portions of the Project Site have the potential to contain undiscovered and unrecorded historical-period archaeological remains. These areas of the Project Site, although currently or previously paved, may have not been previously subjected to substantial grading or other excavation that would have damaged, destroyed or removed archaeological remains of historic-period occupations. Based on the pedestrian survey, there are no apparent deep foundations or footings within these areas. Excavations undertaken in other areas of downtown Los Angeles indicate that remains of historical-period architectural foundations, privies, and trash deposits may be present in such areas. These features, if present, could provide information on the daily lives and activities of the area's historical-period residents.

Based on the above, construction of the Proposed Project, including associated grading, excavations, and the development of proposed structures and other improvements is not anticipated to disturb, damage, or degrade archaeological resources or their settings in and around the Project area. However, as it is possible that archeological resources may be encountered during construction, such impacts would be considered significant. In the event that archaeological resources are found, the mitigation measures proposed below would ensure that potential impacts would be reduced to a less than significant level.

(b) Native American Resources

Although the Project Site has previously been developed and graded, the potential exists that past Native American use of Project Site may have occurred and the potential to encounter buried prehistoric or Native American resources during development of the Proposed Project exists. However, this possibility is remote as the Project Site is located at some distance from the presumed location of the Ya'angna (LAN-1595), the only known prehistoric site in the vicinity, located near Union Station in Downtown Los Angeles. In addition, as discussed above, the NAHC conducted a search of the Sacred Lands File, and no known Native American cultural resources exist on the Project Site. Nonetheless, as it is possible that Native American resources may be uncovered during construction, impacts to Native American resources would be considered significant. In the event that Native American resources are found during construction, the mitigation measures proposed below would ensure that impacts to such resources would be reduced to a less than significant level.

(2) Project Operations

Operation of the Proposed Project would not cause ground disturbances with the potential to encroach or disturb unknown archaeological resources. Therefore, no operational impacts to archaeological resources would occur.

4. Cumulative Impacts

As described above, there is only one known archaeological site within a 0.5-mile radius of the Project Site. In addition, like the Proposed Project, the related projects are located within urban areas of the City that are already developed. In the event that such resources are uncovered as part of development, each related project would be required to comply with 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 of paleontological resources and archeological resources. Furthermore, although no archaeological sites have been found in the Project Site and uncovering of archaeological resources is not anticipated during proposed construction activities, implementation of the recommended mitigation measures regarding the protection of such resources would ensure that potential impacts would be reduced to a less than significant level. Thus, the combined cumulative impacts on archaeological resources associated with the Project's incremental effect and the effects of the other projects would be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

No Project Design Features are proposed with regard to archaeological resources.

b. Mitigation Measures

The following mitigation measures are proposed to ensure that potential impacts to archaeological resources would be less than significant:

Mitigation Measure I.2-1: Prior to starting ground-disturbing activities, such as construction work on the Project Site in the areas identified as archaeologically sensitive in Figure IV.I.2-1, the Project shall retain a Project archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards and is eligible for or listed in the Register of Professional Archaeologists.

Mitigation Measure I.2-2: If potential archaeological resources are identified during monitoring of ground-disturbing activity, the archaeologist shall order the temporary diversion of work outside a 200-foot radius around the discovery until the archaeologist has evaluated whether they are eligible for the listing in the California Register of Historical Resources or National Register of Historic Places. After the archaeologist determines that the resources are not significant, or if significant, have been successfully recovered (per Mitigation Measure 1.2-3), work may resume in the area where the archaeological resources were encountered.

Mitigation Measure I.2-3: If archaeological resources are found to be eligible and thus are significant historical resources under CEQA, a data recovery plan shall be developed and implemented. This data recovery plan shall include methods for hand-excavation, analysis, and report writing and shall also provide procedures for the curation of any collected material and associated Project material at a facility meeting federal standards. The historical resource shall be recorded in accordance with requirements of the Office of Historic Preservation (i.e., using Department of Parks and Recreation 523 Series forms).

Mitigation Measure I.2-4: If potential human remains are encountered during ground-disturbing activities, all work shall halt, and the Los Angeles County Coroner's Office and the Los Angeles Police Department shall be notified, as prescribed in Public Resources Code §5097.98 and Health and Safety Code §7050.5. If the Coroner determines that the remains are of Native American origin, the Coroner shall proceed as directed in §15064.5(e) of the State CEQA Guidelines. The Proposed Project shall follow the guidelines set forth in Public Resources Code §§5097.98 and 5097.94(k).

Mitigation Measure I.2-5: If significant archaeological resources are found, draft reports on archaeological findings shall be prepared by the project archaeologist for submission to the City of Los Angeles for review. Final versions of these reports shall be submitted to the City of Los Angeles and the South Central Coastal Information Center at California State University, Fullerton.

6. Level of Significance After Mitigation

Implementation of the above mitigation measures would ensure that any potential impacts associated with archaeological resources would be reduced to a less than significant level.