

## IV.L CULTURAL RESOURCES

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### 1. INTRODUCTION

This section addresses the proposed project's impacts on historic resources. As part of the scoping process for this Draft EIR, the City of Los Angeles Planning Department identified that impacts associated with paleontological resources and archaeological resources could be mitigated to a less than significant level and, therefore, limited study is provided within this EIR. However, potential impacts associated with the rehabilitation of the Herald Examiner building and the redevelopment of the nearby 12<sup>th</sup> Street and Hill Street sites required further evaluation in the EIR. The information contained in this section is derived from a Cultural Resources Technical Report prepared by Historic Resources Group. This report, dated October 2005 and updated in February 2006 to reflect additional design information from the architects, is included in **Appendix IV.L** of this EIR.

### 2. ENVIRONMENTAL SETTING

#### a. Historic Context

From the late 1800s to the early 1900s, the vicinity of the property was comprised of either residential or undeveloped lots used as parking lots. From the late 1920s through the late 1940s, a series of aerial photographs, known as the Fairchild Photographs held at Whittier College, show that the surrounding properties were becoming increasingly developed and commercial.

Current land uses in the neighborhood include retail stores, wholesale outlets, parking structures and surface parking lots. The prominent structures within the South Park neighborhood include the Los Angeles Convention Center, Staples Center, the Fashion Institute of Design and Merchandising (FIDM) and the California Hospital Medical Center. No structures surrounding the proposed project sites are defined as historic resources. No formal historic resources survey documentation of the Press building was found during the course of historical research conducted by Historic Resources Group. Structures and uses associated with each of the three projects sites are discussed below.

#### b. Broadway Site

The Broadway site contains the existing Herald Examiner building, which was designed by Julia Morgan in 1913 at the direction of William Randolph Hearst of the Hearst Corporation to house the *Herald Examiner* operation. Built in 1915, the building remained the offices of the *Herald Examiner* newspaper until it closed in 1989. On August 17, 1977, the Herald Examiner building was designated Historic-Cultural Monument #178 by the City of Los Angeles due to its significance to the cultural and social

history of Los Angeles. The Herald Examiner building was formally determined eligible for listing in the National Register of Historic Places by the Keeper of the National Register (evaluation code "251") on April 21, 1992 under Criterion B for its association with significant persons and, under Criterion C for its architectural significance. Areas of significance identified in the nomination include communications and architecture. The Herald Examiner building was automatically listed in the California Register because it has been formally determined eligible for listing in the National Register, or Category 1 in the State Historical Resources Inventory. Currently the building is unoccupied and is occasionally rented out as a setting for filming.

As discussed in the Cultural Resources Technical Report, included in **Appendix IV.L**, the Herald Examiner building is significant under National Register Criteria B for its association with William Randolph Hearst, owner of the Los Angeles Examiner and a renowned newspaper and magazine magnate. The building is fundamental to the documentation of the Hearst newspaper empire in Los Angeles. The building is also significant under Criterion C as a work of Julia Morgan, one of the most well-known and talented female architects of the early 20<sup>th</sup> century. The Herald Examiner building is one of the few buildings in Los Angeles designed by Morgan, and was her first major commission for William Randolph Hearst, who then became her life-long client. Constructed in 1915, the building is an excellent example of the Mission Revival style of architecture that was popular throughout Southern California in the early part of the 20<sup>th</sup> century. The building is also significant as one of the only industrial projects Julia Morgan designed.

The Herald Examiner building, located at 1111 South Broadway, is an example of the Mission Revival style. The cast-in-place concrete and concrete encased structural steel structure comprise a 103,555-square-foot building with five stories. The tan stucco-like exterior is capped by red-tiled hipped and gabled roofs, surmounted with a series of blue and yellow tile domes. A five-story central pavilion provides the focal point for the rectangular-shaped structure.

The building is located on a 41,859-square-foot lot. The floor plate (first and second floors) is 35,200 square feet. The structure, which has a length of 320 feet and width of 110 feet, has building heights of 45 feet and 125 feet. The central dome is 35 feet in diameter and 30 feet in height. The building is essentially a two-story building with a basement and a small five-story portion in the center of the structure. The first, mezzanine and second floors each comprise the entire floor of the buildings, while the third and fourth floors are limited to the center portion of the building. The fifth floor, in the past primarily used for storage, is located in the tiled dome at the top of the building.

Additional building details, including character-defining features and building history are discussed in detail in **Appendix IV.L**.

### c. Hill Street Site

The Hill Street site contains the Press building, which was built adjacent to the Herald Examiner building in 1948 to accommodate large printing presses associated with the production of the *Herald Examiner* newspaper. Other than its use as an occasional film location, the building has remained vacant for the past 16 years.

The Press building structure is located on its own parcel west of the Herald Examiner parcel and is connected to the second floor of the Herald Examiner building by a bridge. The structure is constructed of concrete encased structural steel with exterior walls of reinforced concrete block and has a stucco finish. Each of the elevations of the building has similar materials and features, including fenestration, entrances and minimal decorative details. The architectural features of the building have been altered through time, and very few interior features remain that contribute to the understanding of the building's original function as a printing plant. The architect for the Press building was William J. Heiser. Heiser is not known to be a notable local architect; a search of the Los Angeles Public Library and *Los Angeles Times* archives did not provide any information on his career.

In 1954, an addition was built under the parking lot to the north of the building, led by architect Raymond R. Shaw and licensed engineer William D. Coffey. Shaw was chief designer of Felchin, Shaw and Franklin, a company that designed and built many of Fresno's largest buildings. His involvement with the Press building was limited, given the scope and construction date of the work.

The Press building has undergone extensive alterations. Alterations to the exterior of the building include changes to the fenestration elements on each elevation and the enclosure of the primary entrance on the west elevation. While the north elevation retains much of its architectural character, the west elevation has undergone more substantial alterations to its character-defining features. Alterations to the interior of the building include the removal of much of the first and mezzanine levels, leaving them open to the basement. Spaces within the first and mezzanine levels are highly altered. No original printing press materials or features remain. Sets and props from film production have been constructed within the open space. Side rooms off the main space appear to have been altered with the addition of partitions and removal of printing press and features. The upper floors of the Press building have also been altered. The second floor is a predominantly open space with original columns and non-original partitions that were added to accommodate film production. Many wall, ceiling and floor materials have been altered. The third floor hallway has been altered, and the floors, partitions and ceilings of other spaces have also been altered.

An evaluation of the Press building was conducted by Historic Resources Group as part of the Cultural Resources Technical Report, provided in **Appendix IV.L**. The normal benchmark for evaluating a building for historic significance is 50 years. Although the Press building is less than 50 years old, the evaluation was done using the National Register Criteria for Historic Buildings. The evaluation included research and review of Sanborn Fire Insurance and Assessor Maps of the project site, building permits, historical articles and photographs and analysis to determine whether the Press building might be considered a “discretionary historical resource” under the California Environmental Quality Act (CEQA).

For the purposes of CEQA, resources that are given an evaluation code of 3, 4 or 5 in a historic resources survey that meets the requirements set forth by the California Office of Historic Preservation (OHP) are presumed to be historically or culturally significant. The Press building is not listed in the Historical Resources Inventory (HRI) of the State of California, which is maintained by the OHP and the California Historical Resources Information System (CHRIS). No formal historic resources survey documentation of the Press building was found during the course of historical research conducted by Historic Resources Group, as mentioned in the **Historic Context** subsection. The results of the evaluation conducted by Historic Resources Group to determine the Press building’s potential as a “historical resource” as defined under CEQA Section 21084.1 showed that the Press building has neither been listed nor found eligible for listing in the National Register of Historic Places nor the California Register of Historical Places. The HRI and CHRIS classify historical resources in the state’s inventory, which have been identified through a regulatory process or local government agency.

The Press building has undergone extensive alterations over the years, as described above. As none of the features related to its original use and relationship to the Herald Examiner building are extant, the Press building does not retain a level of historical significance as an individual structure or as a contributor to the Herald Examiner building. For these reasons, the Press building is not considered a historical resource as defined by CEQA Section 21084.1. The Press building has not been designated as a City of Los Angeles Historic-Cultural Monument, and does not appear to be eligible for this designation. As stated above, while the Herald Examiner building was designated by the City of Los Angeles as a Historic-Cultural Monument, the Press building was not addressed as a contributor to its significance. Additional building details, including character-defining features, building alterations and building history are discussed in detail in **Appendix IV.L**.

**d. 12<sup>th</sup> Street Site**

The 12<sup>th</sup> Street site consists of a surface parking lot bounded by 12<sup>th</sup> Street on the north, South Main Street on the east, other properties on the south and South Broadway on the west. No extant structures are located on this site or on immediately adjacent parcels.

### 3. REGULATORY FRAMEWORK

#### a. California Environmental Quality Act

Section 21084.1 of the Public Resources Code provides the framework for determining whether a property is a historic resource for CEQA purposes. Historic resources that are listed in or eligible for listing in the California Register of Historical Resources; that are per se significant other resources; that are officially designated on a local register; or that are found to be significant by the State Historic Preservation Officer (SHPO) under Section 5024.1(j) of the Public Resources Code are presumed to be significant. According to CEQA, in determining potential impacts on historical resources under CEQA, projects are reviewed according to the Secretary of the Interior's Standards. A "substantial adverse change" means "demolition, destruction, relocation or alteration of the resource such that the significance of a historical resource would be materially impaired." The setting of a resource should also be taken into account in that it too may contribute to the significance of the resource, as impairment of the setting could affect the significance of a resource. Material impairment occurs when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

CEQA regulations identify the Secretary of the Interior's Standards as a measure to be used in determinations of whether or not a project of new development or rehabilitation adversely impacts an "historical resource." Section 15064.5(b)(3) states:

*"Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource."*

## ***California Register of Historical Resources***

The California Register of Historical Resources (CRHR) was established to be a comprehensive listing of California's historic resources, including those of national, state and local significance. A resource must meet one or more of the following criteria for listing on the California Register of Historical Resources:

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

The California Register automatically includes the following:

- *California properties listed or formally determined eligible for listing in the National Register of Historic Places;*
- *California Registered Historical Landmarks from #0770 onward; and*
- *California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion in the California Register.*

Other resources may be nominated for listing in the California Register based on the criteria stated above.

### **b. City of Los Angeles Historic-Cultural Monument**

The Los Angeles City Council designates Historic-Cultural Monuments on recommendation of the Cultural Heritage Commission. Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities.

Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for local landmark status if they retain their original design and materials. Those that are quality samples of past architectural styles or that have historical associations may meet the criteria in the Cultural Heritage ordinance.

Sec. 22.130 of Article 4 of the City of Los Angeles Administrative Code defines a historical or cultural monument as:

*"...any site (including significant trees or other plant life located thereon) building or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites in which the broad cultural, economic or social history of the nation, state or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state or local history or which embody the distinguishing*

*characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age."*

### **c. The Secretary of the Interior's Standards for Rehabilitation**

As discussed above, CEQA regulations identify the Secretary of the Interior's Standards as a measure to be used in determinations of whether or not a project of new development or rehabilitation adversely impacts an "historical resource." The Secretary of the Interior's Standards state:

1. A property shall be used as its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of distinctive materials or alteration of features, and spaces that characterize a property shall be avoided.
3. Each property shall 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 architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall 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 other visual qualities and, where possible, materials. Replacement of missing features will be substantiated by documentary, physical or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale and architectural features to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction shall 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.

Therefore, in determining the impact of a project on an "historical resource," CEQA regulations require the application of the Secretary of the Interior's Standards to the question of whether the project results in a substantial adverse change to the resource and in particular those physical characteristics or character-defining spaces and features that convey its historical significance. For the purposes of this report, the

proposed rehabilitation of the Broadway building (the historic resource itself) and the proposed development of the Hill Street site (new construction adjacent to the historical resource) are reviewed for potential significant impacts.

#### 4. ENVIRONMENTAL IMPACT ANALYSIS

##### a. Significance Criteria

The Initial Study prepared for the proposed project determined that potential impacts to archaeological and paleontological resources and human remains would be less than significant, with the inclusion of **MM-CR-1**, **MM-CR-2** and **MM-CR-3**.

As stated in the *L.A. CEQA Thresholds Guide*, 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.<sup>1</sup>

As discussed in the *L.A. CEQA Thresholds Guide*, significant impacts to paleontological resources are determined based on the following thresholds of significance:<sup>2</sup>

- Whether or the degree to which the project might result in the permanent loss of, or loss of access to, a paleontological resource; or
- Whether the paleontological resource is of regional or statewide significance.

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource.<sup>3</sup>

A substantial adverse change in significance occurs if the project involves:

- 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;
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity;

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<sup>1</sup> *L.A. CEQA Thresholds Guide*, City of Los Angeles, Environmental Affairs Department, May 14, 1998, p. M.2-12.

<sup>2</sup> *L.A. CEQA Thresholds Guide*, City of Los Angeles, Environmental Affairs Department, May 14, 1998, p. M.1-3.

<sup>3</sup> *L.A. CEQA Thresholds Guide*, City of Los Angeles, Environmental Affairs Department, May 14, 1998, p. M.3-3.

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

## **b. Project Impacts**

### *Archaeological Resources*

- *Significant impacts upon archaeological resources would result from the proposed project if the project disturbed, damaged, or degraded an archaeological resource or its setting.*

As discussed in the Initial Study prepared for the proposed project, no known archaeological sites exist on or adjacent to the project site. The proposed project would not cause new subsurface disturbance of the Broadway building; and excavation activities at the Hill Street and 12<sup>th</sup> Street sites would occur to construct the foundations and subterranean parking levels for each of the proposed buildings. As the project sites have been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed unique archeological resources exist on these sites. However, unanticipated discovery of unique archeological resources is possible. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur. However, implementation of **MM-CR-1** would reduce potentially significant impacts to a less than significant level.

### *Paleontological Resources*

- *Significant impacts would result to paleontological resources based on whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; or*
- *Significant impacts would result to paleontological resources based on whether the paleontological resource is of regional or statewide significance.*

As discussed in the Initial Study prepared for the proposed project, no unique paleontological resources or unique geologic features are known to occur on the project site; although, paleontological resources do exist throughout the City of Los Angeles. The proposed project would not cause new subsurface disturbance at the Broadway building. The Hill Street and the 12<sup>th</sup> Street sites would be excavated to construct foundations and subterranean parking levels for each of the proposed new buildings. As the project sites have been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that undisturbed paleontological resources or unique geologic features exist in the upper levels of subsurface soil. The sites are underlain by alluvium sands that are not typically known to yield paleontological resources. However, unanticipated discovery of unique paleontological resources is possible and thus could result in potentially significant impacts associated with the disturbance of

paleontological resources. However, implementation of **MM-CR-2** and **MM-CR-3** would reduce these impacts to a less than significant level.

### ***Historical Resources***

The Cultural Resources Technical Report, included in **Appendix IV.L** of this EIR, examines three areas of potential impact related to cultural resources. These three potential impacts are associated with (1) rehabilitation of the existing Broadway building; (2) demolition of the existing Press building; and (3) adjacent new construction on the Hill Street site. Potential impacts in these three areas are discussed below.

#### **Rehabilitation of the Existing Broadway Building**

The rehabilitation of the existing Broadway building, as discussed below, is detailed further in the Cultural Resources Technical Report, including in **Appendix IV.L** of this EIR.

#### ***Site***

The rehabilitation of the Herald Examiner building would include site work along its east (primary), north and west (rear) elevations. Pedestrian access would be via the Grand Lobby on Broadway or via the courtyard adjacent to the west side of the building. No vehicular access is anticipated to be provided to the Broadway site; all parking for the Broadway building would be provided in the new Hill Street building's four-level subterranean parking lot. A 50-foot-wide courtyard on the west would be added at the adjacent Hill Street site.

#### ***Exterior***

The project would retain and preserve character-defining features, as detailed in the Cultural Resources Technical Report, on each of the building's elevations. Treatments that would be undertaken include the cleaning of each elevation and related character-defining features, protection of historic fabric throughout the cleaning and rehabilitation process and repair or replacement of features where necessary. Alterations by the project would not change, obscure or destroy character-defining materials, features or finishes on the exterior of the building. The project would include alterations or additions that are compatible yet distinguishable from the historic fabric of the building.

Windows in the turrets and central tower would be repaired. Missing and significantly deteriorated or altered windows with less than 50 percent of the window intact and operable would be documented and replaced with new windows compatible to the style, configuration and profiles of the original fenestration. Non-historic windows would be replaced with new windows to match the original

fenestration. All hardware would be refurbished and new hardware would be provided where missing or required.

All wood and metal doors would be repainted and repaired, so that the doors and frames are watertight and operable. Broken lights would be replaced and all hardware would be refurbished, with new hardware provided where missing or required. The central entrance metal door would be replaced with gates matching the original in style, configuration and profile. Two non-historic metal doors leading to the roof would be replaced with new, solid core metal doors per code. Light fixtures would be removed, refurbished and rewired to comply with current codes.

### **East and North Elevations**

The east (primary) elevation on the ground floor fronting Broadway and the north elevation fronting 11<sup>th</sup> Street have been altered and no original materials from the windows remain. The window openings have not been otherwise altered. Upon implementation of the proposed project, new windows for the east and north elevations would be designed to be compatible with Julia Morgan's original design intent. The central opening, another character-defining feature of the east elevation, would be replaced with a new ornamental iron grille and gates to match the style, configuration and profiles of historic ornamental iron used in Morgan's design.

### **West Elevation**

The west elevation is a secondary elevation and is utilitarian in design. Previous alterations have affected the integrity of much of the elevation. A bridge, built later than the original Herald Examiner building, connects the building to the second floor of the adjacent Press building. This addition removed and altered most of the south end of the west façade. A key element of the rehabilitation of the back elevation is the rebuilding of the upper story, along the south end of the elevation, which was largely lost or damaged by past alterations. This portion would be rebuilt using historical, pictorial and physical documentation in order to ensure accuracy and that the historic character of the back elevation is retained and repaired, with lost elements replaced so as to allow the upper portion of the elevation to have the symmetry and continuity it was originally given in Morgan's design.

The project would not remove any original windows. Fenestration along the northern portion of the west elevation includes existing triple-sash windows. Mezzanine windows are currently half the height of the third-story windows. Extant windows of the mezzanine would be retained.

The project would replace missing windows with compatible new windows to continue the fenestration line of each story along the elevation. The design of new windows would be appropriate and compatible

to the building in size, scale, material and color and would not create a false historical appearance. No original ground floor fenestration along the back elevation would be replaced in order to facilitate new retail spaces. In keeping with the industrial aesthetic, new openings would be framed with steel and a new steel canopy will be built along the ground floor/second-story line.

### **Roof and Skylights**

Roof elements including built-up layers of roofing and deteriorated mechanical equipment would be removed and replaced. Missing or deteriorated tiles would be replaced with matching tiles. Salvaged tiles would be installed on the street elevations of the building (11<sup>th</sup> and Broadway), while remaining tiles and new tiles would be installed on the west and south elevations. The existing skylights in the building roof would be repaired and incorporated into the design. Existing steel framed skylights would be repaired, or if too deteriorated, would be replaced in kind.

### ***Interior***

The project would retain and preserve the extant historic character of the interior, with distinctive materials, features, spaces and spatial relationships maintained. These spaces would be rehabilitated for future commercial and office tenants. The project would rehabilitate all historic and character-defining features, while repairing and replacing materials in-kind where necessary. To update the historical resource for current use, all mechanical equipment and ducts, plumbing piping and fixtures, and electrical conduit and devices, except historic fixtures would be removed.

### **Basement**

The majority of partition walls along the southwest end of the basement would be removed, while some extant masonry walls and columns would remain. New walls to be constructed would create partitions at the southwest corner of the basement. The resulting new spaces would house mechanical, electrical and trash services. New walls would also enclose hallways and stairwells.

### **First Floor**

The majority of partition walls at the northwest quadrant of the first floor would be removed, as well as the stair at the northwest corner of the floor. Extant masonry walls and original columns located along the perimeter of the historic lobby and vestibule spaces would remain, as would the original elevator shaft and both stairs flanking the elevator.

While the extant elevator shaft would remain, a new cab and machinery would be installed. Extant original doors along the east would be made operational. Extant non-original doors along the west

would be removed and the wall material would be patched to match the original walls. A new wood door with glass lights would be installed at the west end of the historic lobby that is compatible to the style, configuration, finish and profiles of original adjacent wall panels.

Commercial tenant space would occupy both the north and south ends of the eastern half of the first floor, with extant columns to remain. The northern portion of the commercial tenant space would extend to the west (rear) elevation of the building, with new walls enclosing one stair and a trash room, all of which would open onto the west (rear) elevation. The area west of the lobby and elevator shaft would include one new elevator enclosed with new walls, as well as stairs leading to upper floors that would be enclosed with new walls. A new security desk would be included in what would become the west lobby. To the south of the west lobby would be an enclosed stair leading to upper floors.

The southern portion of the commercial tenant space would extend to the west (rear) elevation of the building, with new walls enclosing one stair and a trash room.

### **Mezzanine**

The mezzanine level originally existed at the tower and northwest corner of the building and was extended to the entire eastern side at a later date. The majority of walls on the mezzanine floor, other than perimeter walls and those around the central space above the historic lobby, would be removed. The existing slab would be removed.

### **Second Floor**

The majority of walls other than those along the perimeter and some enclosing the historic elevation and stairs would be removed. The second floor would include office space with new enclosed stairs leading down to lower floors. A new elevator would be centered between the stairs and would serve the offices.

### **Third Floor**

All extant walls along the perimeter of the third story, extant columns and those around the stairwell would remain, as would a portion of the interior walls. Some demolition of walls would occur, including those along the western spaces of the floor as well as a portion at the southeast corner. Two new walls would be constructed in order to create two new mechanical lofts along the east elevation. All original interior finishes would be retained and repaired. The floor would be used for offices and would be accessed by the central historic stair and the historic fire escapes. The elevator just east of the stair at the center of the floor would also provide access to this floor.

#### **Fourth Floor**

Extant original perimeter walls and all original interior walls would remain, while walls to the west of the original portion of the fifth floor, where extensive alterations have occurred, would be removed. The fifth floor plan would include repair of all original interior finishes and of the steel fire escapes and access ladders. The extant elevator and stair providing access to the space would remain. A new roof terrace would be constructed to the west.

#### **Demolition of the Existing Press Building**

As detailed in the Cultural Resources Technical Report, included in **Appendix IV.L** of this EIR and summarized under Environmental Setting, above, the existing Press building, located on the Hill Street site and adjacent to the historic Broadway building, has neither been listed nor been found eligible for listing in the National Register of Historic Places, the California Register of Historic Places nor has it been determined to be listed as a Historic-Cultural Monument in the City of Los Angeles. Furthermore, the building is not listed in the HRI of the State of California.

As stated above, while the Herald Examiner building was designated by the City of Los Angeles as a Historic-Cultural Monument, the Press building was not addressed as a contributor to its significance. The existing Press building was not found to be a historical resource for the purposes of CEQA, as it does not fall into one of the three categories defined by Section 21084.1 of the Public Resources Code: (1) the site is not listed in or eligible for listing in the California Register of Historical Resources; (2) the site is not officially designated on a local register or site found significant by the State Historic Preservation Officer (SHPO) under Section 5024.1(j) of the Public Resources Code; and (3) the site is not listed or determined to be eligible under the criteria for the California Register of Historical Resources. Properties designated by local municipalities can be considered historical resources; however, as stated above, the site has not been determined to be listed or eligible for listing as a Historic-Cultural Monument in the City of Los Angeles. The Hill Street building, therefore, is not considered a “mandatory” or “presumptive” historic resource under Section 21084.1 of the Public Resources Code. Further, a technical survey was completed by the Historic Resources Group, which determined that the structure is not a “discretionary historic resource” under Public Resources Code Section 21084.1 or the Guidelines Section 15064.5(a)(4). Specifically, the survey concludes that the building has undergone extensive alternations and does not meet the criteria for architectural or historical significance either as an individual structure or a contributor to the Herald Examiner building. For these reasons, the proposed demolition of the existing Press building would not result in a significant impact to a historic or cultural resource.

### **New Construction on Hill Street Site Adjacent to Historic Resource**

The proposed new construction on the Hill Street site would include demolition of the existing Press building and the construction of a new mixed-use tower building. The building would be approximately 280 feet high, with 23 stories including penthouse suites, and would be over 300 feet long and 55 feet wide. The new building would contain 256 condominium units and approximately 2,560 square feet of retail space on the ground floor. The ground level would also feature a garden court and commercial plaza that would create functional open space for patrons and residents of the new building. Four subterranean parking levels would contain approximately 422 parking spaces that would serve both the new Hill Street building and the rehabilitated Broadway building. On-site recreational amenities would include private decks, a roof deck and a plaza over the eastern portion of the site. Separating the new Hill Street building from the rehabilitated Broadway building would be a courtyard approximately 50 feet wide. Vehicular access would be provided from a driveway located along the south side of the site.

As discussed above, the Press building is not a historic resource for purposes of CEQA, and the proposed demolition of the existing Press building would not result in a significant impact to a historic or cultural resource. However, according to CEQA standards, this chapter analyzes whether the demolition of the existing Press building and replacement with the new tower building would conflict with the Secretary of the Interior's Standards for Rehabilitation as "related new construction" to the adjacent Broadway building or as a potential indirect significant impact to the "immediate surroundings" of the Broadway building.

### **12<sup>th</sup> Street Site**

No extant structures are located on the 12<sup>th</sup> Street site or on immediately adjacent parcels, as discussed above. Therefore, no potential historical resources would be impacted by the construction of a new building on the 12<sup>th</sup> Street site. Construction on the 12<sup>th</sup> Street site does not have the potential to significantly impact the Broadway site due to the distance of the 12<sup>th</sup> Street site from the Broadway site.

### **Conformance with the Secretary of the Interior's Standards for Rehabilitation**

#### ***Broadway Site***

The Herald Examiner building on the Broadway site is a historical resource defined by CEQA because it has been determined eligible for listing in the National Register of Historic Places, is listed in the California Register of Historic Places and is designated as City of Los Angeles Historic-Cultural Monument #178. **MM-CR-4** through **MM-CR-7** would reduce potential impacts associated with the rehabilitation of the Broadway building to a level that is less than significant. The mitigation includes

(1) cleaning with the gentlest means possible, patching and repairing to match historic surfaces and elements in composition, texture and finish, and replacing missing or severely deteriorated elements with compatible material to match the original design and material properties of the material; (2) designing the building to be compatible with the historical building and its character-defining features and meeting the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; (3) protecting historic features and materials, as identified in the Cultural Resources Technical Report in **Appendix IV.L**, throughout construction ; and (4) documenting existing conditions prior to the removal and storage of center wood and marble panels, in preparation for the installation of the new door in the historic lobby on the first floor of the Broadway building.

As detailed in the Cultural Resources Technical Report, the proposed rehabilitation of the Broadway building would conform to the Secretary of the Interior's Standards for Rehabilitation in both concept and design. A summary of the discussion of the conformance of the Broadway building to Standards 1 through 10 is below.

**Standard 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.**

The rehabilitation and adaptive reuse of the Herald Examiner building for commercial and office uses would be performed with alterations and new construction in compliance with programmatic requirements as well as compliance with the Public Resources Code and life safety issues. Extant character-defining spaces, spatial relationships and features would be retained and preserved. The Herald Examiner building's interior floor plan, arrangement of spaces and built-in features and applied finishes are collectively important in defining the historic character of the building. Thus, their identification, retention, protection and repair would be given priority in the rehabilitation project.

The rehabilitation and reuse of the Herald Examiner building would require some alterations to the interior, which has undergone extensive alterations over the years in large part due to its use for film production. New interior features and finishes would not be introduced, however, that are incompatible with the scale, design, materials, color and texture of the surviving interior features and finishes and of the historic character of the interior.

The rehabilitation of the existing Broadway building would conform to Standard 1, as all character-defining features and materials would be retained. While some interior modifications would be made to accommodate the new uses within the historical resource, these materials and features are not considered character-defining and are located in highly altered spaces.

**Standard 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.**

As previously stated, the rehabilitation and adaptive reuse of the Broadway building would be performed with little alteration to those spaces with character-defining features and materials, while new construction dictated by code compliance and life safety issues, as well as programmatic requirements, would occur where such features and materials have been highly altered or were previously removed. Extant character-defining spaces, spatial relationships and features would be retained and preserved. New construction to allow for the tenant improvements would be compatible yet distinguishable from the original design aesthetic of the building and would be located in the more altered spaces of the interior. As determined in the Cultural Resources Technical Report in **Appendix IV.L**, the proposed demolition and new construction to occur within the building would not affect the rehabilitation of the existing Broadway building's ability to comply with Standard 2.

**Standard 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.**

Proposed alterations would recognize and retain character-defining features that are a physical record of the property's time, place and use, including the exterior envelope and materials of the building and the interior public and private spaces that portray its original construction, design and use. Proposed construction adjacent to the Broadway building would be distinguishable from the historic fabric of the Broadway building; therefore, the adaptive reuse and rehabilitation of the Broadway building would not result in changes that create a false sense of historical development. The rehabilitation of the existing Broadway building would conform to Standard 3.

**Standard 4: Changes to a property that have acquired historic significance in their own right will be retained and preserved.**

The rehabilitation of the existing Broadway building would conform to Standard 4 as changes that have occurred to the property, including alterations to the fenestration, entrances and within the interior, have not acquired any historic significance.

**Standard 5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.**

All primary distinctive features, finishes and construction techniques or examples of craftsmanship that characterize the property would be preserved by the proposed project. Materials, such as marble, cast plaster, ornamental metal, wood and ceramic tile, would be preserved. All distinctive components that characterize the building would be retained and protected, including the contributing spaces, materials, features and finishes of each elevation and interior floor.

The adaptive reuse of the building would require some demolition, though none of the walls to be demolished contain character-defining features that would need to be retained to preserve the integrity of the resource. Efforts have been made to reduce the impacts of the demolition and, therefore, the adaptive reuse of the building, by limiting new construction and proposed new uses to spaces with the least integrity. The proposed rehabilitation of the existing Broadway building would conform to Standard 5.

**Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.**

The proposed rehabilitation project would not result in the replacement of deteriorated historic features that would conflict with this Standard. Deteriorated historic features would be repaired where possible. Where the severity of deterioration would require the replacement of a distinctive feature, the new feature would match the old in design, color, texture and other visual qualities and, where possible, materials. Replacement of missing features would be substantiated by documentary, physical or pictorial evidence. Accordingly, the rehabilitation of the existing Broadway building would conform to Standard 6.

**Standard 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.**

During rehabilitation, the surface cleaning of the Broadway building would be undertaken using the gentlest means possible. Chemical or physical treatments with the potential to cause damage to historic materials would not be used. Mitigation measures are provided to ensure that the rehabilitation of the exterior and interior materials and finishes would comply with the standards. The specific requirements for treating exterior and interior materials and finishes would be taken into consideration, including those related to concrete, stone, plaster, metal, wood and ceramic tile. Testing would be performed

where necessary to ensure that the safest means are used to clean and repair materials. Accordingly, rehabilitation of the existing Broadway building would conform to Standard 7.

**Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.**

No subterranean work is required for the rehabilitation and reuse of the existing Broadway building. Therefore, the rehabilitation of the Broadway building would conform to Standard 8.

**Standard 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.**

The proposed rehabilitation of the Broadway building itself would conform to Standard 9. As discussed above, the rehabilitation of the Broadway building would be performed with little alteration to character-defining features and materials, while new construction dictated by code compliance and life safety issues, as well as programmatic requirements, would occur where such features and materials have been highly altered or were previously removed. Extant character-defining spaces, spatial relationships and features would be retained and preserved. New construction to allow for the tenant improvements would be compatible yet distinguishable from the original design aesthetic of the building and would be located in the more altered spaces of the interior. For these reasons, the rehabilitation of the Broadway building would conform to Standard 9.

Construction of the proposed new tower building on the Hill Street site, while occurring on a site adjacent to the historic Broadway building, is not considered to be related new construction. The Hill Street site and Broadway site parcels are historically, and would remain, two separate and distinct legal parcels. Further, the new construction on the Hill Street site would be physically set apart from the Broadway building by a 50-foot separation at grade. Therefore, construction on the Hill Street site would not affect historic materials, features or spatial relationships on the historic property and Standard 9 is not technically applicable to the new construction proposed on the Hill Street site.

Although Standard 9 is not directly controlling, the intent of the standard is to ensure compatibility of new construction where there is potential for adverse impacts to the historic resource and serves as a relevant criteria in determining whether the Hill Street building is or is not compatible with the historic Broadway building as part of its immediate site context. (Discussed in further detail in the **Summary of Impacts** subsection below.)

**Standard 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 will be unimpaired.**

As stated previously, the primary character-defining features of the property, including its exterior and interior, would remain and would be rehabilitated to the Secretary of the Interior's Standards. New additions along the west (rear) elevation have been designed so as not to have an adverse impact on the original spaces and features of the building, including new elevators along the elevation that provide access to underground parking. Accordingly, rehabilitation of the existing Broadway building would conform to Standard 10. The form and integrity of the resource would be preserved.

### **Summary of Impacts**

- *Impacts to cultural resources are considered significant if the project would result in demolition of a significant resource.*

### ***Broadway Building***

The Cultural Resources Technical Report prepared for the project identified the Herald Examiner building as the only historical resource on the project site. The Herald Examiner building has been formally determined eligible for listing in the National Register of Historic Places by the Keeper of the National Register (evaluation code "2S1") and is listed in the California Register of Historical Resources. The building is also designated as City of Los Angeles Historic-Cultural Monument #178. Implementation of the proposed project would involve rehabilitation of the Herald Examiner building in compliance with the Secretary of the Interior's Standards for Rehabilitation. This historically significant building would not be demolished and no potentially significant impact would occur.

### ***Press Building***

The existing Press building, located on the Hill Street site and adjacent to the historic Broadway building, has not been listed or been found eligible for listing in the National Register of Historic Places, the California Register of Historic Places or been determined to be listed as a Historic-Cultural Monument in the City of Los Angeles. Furthermore, the building is not listed in the HRI of the State of California. While the Herald Examiner building was designated by the City of Los Angeles as a Historic-Cultural Monument, the Press building was not addressed as a contributor to its significance. Therefore, the Press building is not a historic resource for purposes of CEQA and demolition of the structure would not create the potential for a significant impact.

**12<sup>th</sup> Street Site**

No extant structures are located on the 12<sup>th</sup> Street site or on immediately adjacent parcels. Therefore, no potential historical resources would be impacted by the construction of a new building on the site, and no potentially significant impact would occur.

For these reasons, there is no potential for significant impacts related to the demolition of a significant resource.

- *Impacts to cultural resources are considered significant if the project would result in relocation that does not maintain the integrity and significance of a significant resource.*

No relocation of significant historical buildings is proposed as part of the project; therefore, there is no potential for significant impacts related to the relocation of a significant resource.

- *Impacts to cultural resources are considered significant if the project would result in 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.*

As discussed in detail above, the proposed rehabilitation of the Broadway building would conform to the Secretary of the Interior's Standards 1 through 10. Therefore, no significant impacts to cultural resources resulting from the project not conforming to the Secretary of the Interior's Standards for Rehabilitation would result from project implementation.

- *Impacts to cultural resources are considered significant if the project would result in construction that reduces the integrity or significance of important resources on the site or in the vicinity.*

The proposed project would include the demolition of the existing Press building and new construction on the Hill Street site, located adjacent to the historic Broadway building. As set forth in Section 15064.5(b) of the *CEQA Guidelines*, a project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment. A substantial adverse change may result from the alteration of resource itself or its immediate surroundings. The size of the adjacent new construction on the Hill Street site has the potential to visually compete with the rehabilitated Broadway building. The proposed mass and height of the Hill Street building, approximately 280 feet in height immediately adjacent to the 45- to 125-foot-high historic Broadway building, has the potential to overwhelm the historic Broadway building and impair its immediate surroundings. This indirect impact on the immediate surroundings of the Broadway building is considered a significant cultural resources impact.

While the adjacent new construction does result in the potential to adversely impact the immediate surroundings of the historic resource, the addition of a new building would not impact the character-defining features of the historic resource or hamper its feasibility for reuse. The proposed Hill Street

building would be located approximately 50 feet west of the historic Broadway buildings. This courtyard is incorporated into the project to define and separate the Broadway building and the new Hill Street building. The setback would differentiate the new construction from the adjacent historic building.

**MM-CR-8**, as outlined below, would reduce this potential adverse cultural resources impact of the new adjacent construction to the immediate surrounding of the historic Broadway building by reducing the visual competition of the two buildings to the extent feasible. The Hill Street building design features included as **MM-CR-8** are summarized below.

- The proposed new construction on the Hill Street site would be located on a separate legal parcel from the adjacent historic Broadway building. A courtyard at least 50 feet wide would separate the Broadway building from the new Hill Street building and would include tiered gardens, separated by hedges, seat walls and a trellis. These site features would not physically connect to any portions of the Broadway building, in order to retain and protect all original features and materials on the Broadway building's west (rear) elevation. The proportions of the courtyard have been established by the Broadway building.
- At the corner of Hill Street and 11<sup>th</sup> Street, the elevation of the new Hill Street building would be set back in order to reveal the west and north (side) elevations of the historic Broadway building.
- A setback would be provided on the courtyard façade of the Hill Street building. The height of the setback is controlled by the roofline of the Broadway building. No balconies would occur below this back line as a reference to the presence and massing of the Broadway building.
- The ground floor of the new Hill Street building would be 15 feet tall to create a sense of entry and grand scale, similar to the ground floor of the adjacent Broadway building.
- Large glazed openings would wrap the ground floor, providing a view of the historical resource.
- The materials and features of the new construction on the Hill Street site shall be distinguishable from those of the Broadway building and shall be designed so as to reflect the historic resource in both the location and use on the east elevation of the Hill Street building that faces the Broadway building.
  - The Broadway-facing façade of the Hill Street building would be designed and constructed with proportions, details and materials that frame, complement and respect the historic Broadway building to ensure its architectural significance is differentiated from the adjacent new construction.

### c. Cumulative Impacts

CEQA requires that the cumulative impacts of a project be examined. While the Herald Examiner building is a visually prominent landmark in its setting, nearby structures, including historic and more recent construction, are of varying heights. The related projects identified in **Section III, Environmental Setting** of this EIR and the 12<sup>th</sup> Street site are located at enough of a distance from the Broadway site to not create any potentially significant cumulative impacts.

Additionally, while the construction of the new building on the Hill Street site would be on a parcel adjacent to the rehabilitated Broadway building, a historical resource, this project-specific impact would not constitute a cumulative impact on this historical resource. As discussed above, the proximity of the adjacent new construction of the proposed new tower building on the Hill Street site relative to the historic Broadway building would affect the setting of the Broadway building, and the massing and height of the new Hill Street building would visually compete with the historic Broadway building. However, this impact is localized given the proximity of the Hill Street and Broadway sites. The related projects identified in **Section III, General Description of Environmental Setting**, of this EIR are all located far enough from the Broadway site that implementation of any one or a combination of all the projects would not collectively affect the setting of the Broadway building, and no significant cumulative impacts would occur.

#### d. Mitigation Measures

The following three mitigation measures were identified in the Initial Study prepared for the proposed Herald Examiner project to reduce unanticipated impacts to unique paleontological and archaeological resources, as well as any discovered human remains.

- MM-CR-1. If archaeological resources are uncovered during excavation of the Hill Street or 12<sup>th</sup> Street sites, the developer must notify the Los Angeles Department of Building and Safety immediately and work must stop within a 100-foot radius until a qualified archaeologist has evaluated the find. Construction activity may continue unimpeded on other portions of the project sites. If the find is determined by the qualified archaeologist to be a unique archaeological resource, as defined by Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archaeological resource, no further action is necessary and construction may continue.
- MM-CR-2. If paleontological resources are uncovered during excavation of the Hill Street or 12<sup>th</sup> Street sites, the City of Los Angeles Department of Building and Safety must be notified immediately and work must stop within a 100-foot radius of the find to allow a qualified paleontologist to appropriately remove the find.
- MM-CR-3. If during excavation of the Hill Street or 12<sup>th</sup> Street sites human remains are discovered, the steps described in *CEQA Guidelines* Section 15064.5(e) shall be followed:
- (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

- (A) The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and
- (B) If the coroner determines the remains to be Native American:
  - 1. The coroner shall contact the Native American Heritage Commission within 24 hours.
  - 2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
  - 3. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
- (2) Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
  - (A) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
  - (B) The descendant identified fails to make a recommendation; or
  - (C) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

The following five mitigation measures are intended to reduce potentially significant impacts to cultural resources associated with the rehabilitation of the existing Broadway building.

MM-CR-4. Rehabilitation of character-defining features and materials shall consist of removing deteriorated paint and corrosion and cleaning with the gentlest means possible, patching and repairing as necessary to match historic surfaces and elements in composition, texture and finish, and replacing missing or severely deteriorated elements with compatible material to match the original design and material properties of the material.

MM-CR-5. Where questions arise about specific details that cannot be discerned from studying the extant physical conditions, historic photographs and documentation, the design shall to be compatible with the building and its character-defining features and shall meet the Secretary of the Interior's Standards for Rehabilitation and the Guidelines for Rehabilitating Historic Buildings.

- MM-CR-6. Historic features and materials, as identified in the Cultural Resources Technical Report, shall be protected throughout construction and repaired and cleaned as necessary using the most gentle means possible.
- MM-CR-7. Photo documentation of existing conditions shall occur prior to the removal and storage of center wood and marble panels, in preparation for the installation of the new door in the historic lobby on the first floor of the Broadway building.
- MM-CR-8. The project shall incorporate the following design features in order to protect the Broadway building from the new Hill Street building as a part of its views and immediate surroundings.
- At the corner of Hill Street and 11<sup>th</sup> Street, the elevation of the new Hill Street building shall be set back in order to reveal the west and north (side) elevations of the historic Broadway building.
  - A setback shall be provided on the courtyard façade of the Hill Street building, the height of which shall be controlled by the roofline of the Broadway building. No balconies shall occur below this back line as a reference to the presence and massing of the Broadway building.
  - The ground floor of the new Hill Street building shall be 15 feet tall to create a sense of entry and grand scale, similar to the ground floor of the adjacent Broadway building.
  - Large glazed openings shall wrap the ground floor, providing a view of the Broadway building from the Hill Street building.
  - The materials and features of the new construction on the Hill Street site shall be distinguishable from those of the Broadway building, and shall be designed so as to reflect the historic resource in both the location and use on the east elevation of the Hill Street building that faces the Broadway building.
    - The Broadway-facing façade of the Hill Street building shall be designed and constructed with proportions, details and materials that frame, complement and respect the historic Broadway building to ensure its architectural significance is differentiated from the adjacent new construction.

#### e. Adverse Effects

Implementation of the recommended mitigation measures would reduce potential project impacts related to the rehabilitation of the Broadway building to a less than significant level. The rehabilitation of the Broadway building would conform to Standards 1 through 10 of the Secretary of Interior's Standards for Rehabilitation. However, construction of the proposed structure on the Hill Street site would be of a size, scale, proportion and mass that would adversely impact the immediate surroundings of the historic Broadway building. While **MM-CR-8** would reduce this impact to the extent feasible, the impact cannot be reduced to a level that is less than significant, due to the sheer height of the Hill Street building.