

4.11 CULTURAL RESOURCES

The following section contains paleontological resources, archaeological resources, and historic architecture.

4.11.1 PALEONTOLOGICAL RESOURCES

This section of the EA/EIR presents the potential impacts to paleontological resources, archaeological resources, and historic architecture resulting from the project.

4.11.1.1 AFFECTED ENVIRONMENT

Paleontology involves the study of past geologic ages, focusing primarily on the study of fossils. Fossils are the remains or traces of plants and animals preserved in sedimentary rocks since some past geologic or prehistoric time. Fossils include casts of the hard parts of an organism (such as bone or shell); the original bone or shell material; petrified portions of an organism (where the original substance such as wood or bone has been replaced by mineral matter; preserved traces of animals such as burrows, tracks, or scat; and a number of other forms.

The project area is located in an area associated with the Central Block of the Los Angeles Basin. Significant earth movements dating to the middle Miocene complicate the geologic history in this area. Prior to the Miocene, the Pacific Ocean inundated the majority of the Los Angeles Basin—a phenomenon reflected in many wells throughout the Central Basin. Throughout the geologic history, thousands of feet of deposits accumulated in the Basin and today, the Basin is considered highly sensitive for fossil marine deposits.

The Los Angeles Basin is underlain by a thick (several thousand feet) sequence of Tertiary age sedimentary rocks. From oldest to youngest, these rocks are represented by the Topanga Formation, Puente Formation (also known as the Monterey Formation), and Fernando Formation. Each formation is comprised of rock layers alternating between sandstone, conglomerate, and siltstone. Younger Quaternary (Holocene) alluvial fan deposits cover the bedrock formations in many areas, including the proposed project area. These deposits consist predominantly of sand and silt, along with smaller amounts of gravel and clay.

The Los Angeles River, located to the east of the project area, is approximately 65 miles in length. It originates in the San Gabriel Mountains and drains into the Pacific Ocean at Long Beach. Prior to 1815, the Los Angeles River drained into an area further west. Today's channel is the result of the flooding of 1925, which etched its current course through the City's core. Significant depth of deposits, considered recent alluvium, caps the majority of the City of Los Angeles. In the proposed project area, recent alluvial deposits (Holocene soils) can be as deep as 50 to 100 feet, but there are locations where bedrock or other

rock formations may be shallower, particularly in the areas furthest from the river. However, the substrate undulates, and fossil remains have been uncovered in numerous areas in the project area vicinity at varying depths. Paleontological resources have been uncovered in younger alluvial soils beneath the intersection of Alameda and Macy Streets (at depths of 35 to 55 feet) and at a site north of 12th Street between Hill and Olive Streets (at a depth of 43 feet). These sites are south and west of the proposed project area, respectively.

Based on the above, the project area is considered to be sensitive for paleontological resources.

4.11.1.2 THRESHOLDS OF SIGNIFICANCE

The County of Los Angeles Initial Study (**Appendix 1.0**) suggests that a project would result in a significant impact to paleontological resources if it would meet the following criteria:

- Does the project site contain rock formations indicating potential paleontological resources?

4.11.1.3 POTENTIAL IMPACTS OF ALTERNATIVES

Alternative 1 – No Project Alternative

Under the No Project Alternative, the project site would remain in its present state. No impacts to paleontological resources would occur with the implementation of this alternative. Thus, the impacts are less than significant.

Alternative 2 – Repair and Reuse Alternative (Proposed Alternative)

Borings completed as part of the geotechnical study for this project indicate that there are no original soils on or present below the project site. Instead, subsurface conditions consist of different depths of construction fill on top of weathered bedrock. Along North Broadway, near Aliso Street, bedrock is present essentially at the ground surface. At Temple Street and North Broadway, however, 15 feet of construction fill overlies the bedrock. Three feet of construction fill is found over bedrock at Spring Street and Temple Street whereas, at Spring Street and Aliso Street, four feet of construction fill is present over bedrock

Grading for the construction of the new parking structure would include the removal of earth materials down to the level of the basement excavation, up to depths of 48 feet below the existing ground surface.

Because there is a possibility that paleontological resources may be present within the boundaries of the project site, these activities may impact undocumented paleontological resources. Destruction of presently unknown paleontological resources would be considered a significant impact. As a result, mitigation measures are recommended in this EA/EIR to reduce any potential impacts to unknown paleontological resources.

Alternative 3 – Adaptive Reuse of the Existing Building to Secretary of Interior Standards

Implementation of this alternative would result in the same impacts described under Alternative 2. Impacts associated with the destruction of undocumented paleontological resources would be significant.

4.11.1.4 MITIGATION MEASURES (ALTERNATIVES 2 AND 3)

The following mitigation measures are recommended for both Alternative 2 and 3:

- PR-1** A qualified paleontologist shall be retained to monitor construction excavations in those portions of the project site that are underlain by geologic units with paleontological sensitivity. Monitoring shall include inspection of exposed rock units and microscopic examination of matrix to determine if fossils are present. If a representative initial sample of the site reveals no significant fossil remains to the satisfaction of the paleontological monitor, then such monitoring may be terminated.
- PR-2** If fossils are present, the monitor shall collect matrix for processing. In order to expedite removal of fossil matrix, the monitor may request heavy machinery assistance to move large quantities of matrix out of the path of construction to designated stockpile areas. Testing of stockpiles shall consist of screen washing small samples (200 pounds) to determine if significant fossils are present. Productive tests will result in screen washing of additional matrix from the stockpiles to a maximum of 6,000 pounds per locality to ensure recovery of a scientifically significant sample. Fossils recovered shall be prepared, identified by qualified experts, and listed in a database to allow analysis. At each fossil locality, field data forms shall be used to record the locality. Stratigraphic columns shall be measured and appropriate scientific samples submitted for analysis.

Adverse Impacts After Mitigation (Alternatives 2 and 3)

With implementation of mitigation measures, impacts to paleontological resources from either Alternative 2 or 3 would be less than significant.

4.11.2 ARCHAEOLOGICAL RESOURCES

The following analysis incorporates information from the Phase I Archaeological Survey/Class III Inventory for the Hall of Justice Study Area, Los Angeles County, California, prepared by W&S Consultants in April 2003. This report can be found in Appendix 4.11(A) of this EA/EIR.

4.11.2.1 AFFECTED ENVIRONMENT

Prehistoric and Historic Setting

The initial Native American occupation of the coast of Southern California appears to have occurred between about 11,000 and 8,500 years ago. Although significant numbers of sites predating about 8,000 before present (B.P.) are known for the central and Southern California coast, few have been found in Los Angeles County. Possible exceptions are skeletal remains from La Brea ("La Brea Woman") dated to about 9,000 years B.P., and Malaga Cove, a large site near Santa Monica Bay that probably predates 6,500 B.P.

Components dating to the period following about 8,000 B.P. (Millingstone Period) are much more common and appear in a variety of settings. Although abundant groundstone assemblages thought to imply a reliance on hard seeds mark these sites, archaeological research in Southern California increasingly demonstrates that this period was marked by regional differentiation and adaptation to local conditions.

The period beginning around 3,000 years ago apparently saw important settlement, subsistence, and technological changes. Some have suggested that these changes may be related to the arrival of Takiic speaking groups from the east, but firm evidence for this occupation is scanty.

Sometime between 1,500 and 1,300 years ago, the patterns began to emerge which characterize the ethnohistoric Gabrielino. This period, the Late Prehistoric is characterized by generally high population densities and elaborate social, political, and technological systems not unlike those of the Chumash just to the north.

At the time of historic contact, the project area was occupied by the Gabrielino, speakers of Takiic languages that occupied the Los Angeles Basin, the coast from Topanga Creek on the north to Aliso Creek on the south and the islands of San Clemente, Catalina, and San Nicolas. The closest known Gabrielino

settlement to the present project area was Yaanga, located near the present Civic Center. This settlement, widely regarded as the precursor of modern Los Angeles, was abandoned by 1836. Its exact location is unknown.

The first European contact in the area occurred in 1769, when the Portola expedition rode through the Los Angeles basin. The first mission established in the region was Mission San Gabriel, established in 1771. Before long, a pueblo was established to support the Mission. The pueblo prospered and by 1800, El Pueblo de los Angeles had become the largest Spanish settlement in California, and the most culturally diverse.

By the time Mexico had won its independence from Spain in 1821, Los Angeles was a leading town of New Spain. By 1835, the population of Los Angeles had grown to 1,650 and included a Native American population of 600. Los Angeles was declared a City, and was the newly appointed Capitol of Alta California, replacing Monterrey.

The United States declared war on Mexico in 1846, and ultimately, Mexico ceded the territory of Alta California to the United States. California gained statehood in 1850 and the County of Los Angeles was established. The population of Los Angeles continued to increase. Before long, Los Angeles had an established water department, Post Office, Police force, Public School system, and its first hotel, The Bella Union.

The gold rush boom and the expansion of the railroads in California demanded a cheap labor force, and potential opportunities for the arriving immigrants and settlers. As many took up residence in Los Angeles, the ethnic makeup of the community began to shift, with Hispanic, Japanese, and Chinese populations increasing.

Since the turn of the 20th Century, the City of Los Angeles has continually modernized and upgraded its City systems to support the flourishing communities. In 1904, Los Angeles began to acquire the water of Owens Valley, ultimately wresting it from the residents of the area. The City quickly modernized the infrastructure, transportation, and communication networks, with power lines, aqueducts, cable cars, subways, and freeways. Much later would come the airports and interchanges. The influxes of specific ethnic populations into Los Angeles continued to fluctuate through the 20th Century as the City itself continued to grow.

Archival Record Search

An archival records search of archaeological site maps, records and files was conducted at the California State University, Fullerton (CSUF), Archaeological Information Center (AIC). This records search was conducted to determine whether the study area had been previously surveyed by archaeologists, and/or whether archaeological sites had been recorded on it. The complete results of this archival record search are included in **Appendix 4.11 (A)** of this EA/EIR.

Site files at the CSUF AIC indicate that the Hall of Justice study area had never been systematically surveyed by archaeologists, and that no sites had been recorded on it. One prehistoric archaeological site had been recorded within a half-mile radius of the study area, however, suggesting moderate archaeological sensitivity. A number of historical properties have also been identified within a half-mile radius of the proposed project. These include both standing architectural structures and historical archaeological sites.

In addition to the record search, two sets of auger boring logs were examined to determine the status of the subsurface soils on the property. The first of these logs were from 1963. More extensive borings were recently completed (March 2003) by Converse Consultants for a geotechnical study. These demonstrate that no original soil is present on or below the study area. Instead subsurface conditions consist of different depths of construction fill on top of weathered bedrock. Along North Broadway, near Aliso Street, bedrock is present essentially at the ground surface. At Temple Street and North Broadway, however, 15 feet of construction fill overlies the bedrock. Three feet of construction fill is found over bedrock at Spring Street and Temple Street whereas, at Spring Street and Aliso Street, four feet of construction fill is present over bedrock. This fill has the potential to contain historical archaeological resources, specifically evidence of the use of the property prior to the construction of the Hall of Justice.

In summary, the record search indicates that no known archaeological sites exist in the study area. Examination of the auger borings suggest that there is essentially no likelihood for intact prehistoric archaeological remains. These same borings indicate that historical archaeological remains may be present, in that borings through such remains can be interpreted as fill. The archaeological sensitivity of the study area is considered very low for prehistoric remains and moderate to high for historical archaeological resources.

Field Survey

An intensive Phase I surface survey/Class III inventory of the Hall of Justice study area was conducted by W & S Consultants on 19 April 2003. This survey was intended to assess the current status of the study area, to locate and record archaeological sites if possible, and to identify areas that appeared to have high potential for archaeological remains.

Because the study area has been fully developed and urbanized, the approach taken to the field investigation was the identification of areas of open ground surface that might provide some clue as to the nature of the soils present in a given locale. The survey then involved intensive examinations of the ground surface in areas where such could be observed, although these were extremely limited, consisting only of a few spots around the edges of the property. Ground surface visibility, in other words, was close to non-existent for the study area.

No evidence for archaeological resources of any kind could be observed within the study area. However, field conditions were such that any extant remains of a prehistoric or historical nature within the study area would have been difficult if not impossible to identify in the field.

4.11.2.2 THRESHOLDS OF SIGNIFICANCE

County of Los Angeles

The County of Los Angeles Initial Study (**Appendix 1.0**) suggests that a project would result in a significant impact to archaeological resources if it would meet the following criteria:

- Is the project site in or near an area containing known archaeological resources or containing features (drainage course, spring, knoll, rock outcroppings, or oak trees) which indicate potential archaeological sensitivity?

California Environmental Quality Act

According to Appendix G of the *CEQA Guidelines*, a project would cause a significant environmental impact if it will:

- “(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.”

National Environmental Policy Act/National Register of Historic Places Criteria

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:

- (a) That are associated with events that have made a significant contribution to the broad patterns of our history; or
- (b) That are associated with the lives of persons significant in our past, or
- (c) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction, or
- (d) That have yielded, or may be likely to yield, information important in prehistory or history.

4.11.2.3 POTENTIAL IMPACTS OF ALTERNATIVES

Alternative 1 – No Project Alternative

Under the No Project Alternative, the project site would remain in its present state. No impacts to archaeological resources would occur with the implementation of this alternative. Thus, the impacts are less than significant.

Alternative 2 – Repair and Reuse Alternative (Proposed Alternative)

An intensive Phase I archaeological survey/Class III inventory was conducted for the Hall of Justice study area. This involved background studies reviewing the prehistory and ethnography of the study area; an archival records search to determine whether any prehistoric or historical archaeological sites had been recorded or were known to exist on this property; a review of auger boring logs; and an intensive on-foot survey of the study area.

The Phase I archaeological survey/Class III inventory of the study area failed to find evidence in the field for the existence of extant archaeological resources of any kind. The background review of the prehistory and ethnography of this region, moreover, revealed the fact that no known archaeological sites have been recorded within or in the immediate vicinity of the study area. The auger borings demonstrated the presence of a layer of construction fill overlying bedrock. While the presence of this construction fill effectively precludes the existence of intact prehistoric archaeological resources within the study area, it

also raises the possibility that historical archaeological resources may be present. Based on these findings, construction of the new parking structure and repair of the building does not appear to have the potential to result in adverse impacts to known prehistoric archaeological resources. However, the existing construction fill below the project site has the potential to contain historical archaeological resources, which might be adversely effected due to construction and earthmoving activities. Consequently, potential impacts are considered to be significant.

Alternative 3 – Adaptive Reuse of the Existing Building to Secretary of Interior Standards

Implementation of this alternative would result in the same impacts described under Alternative 2. Impacts associated with the destruction of undocumented archaeological resources would be significant.

4.11.2.4 MITIGATION MEASURES (ALTERNATIVES 2 AND 3)

- AR-1** All subsurface grading on the site shall be monitored by an archaeologist to ensure that no intact archaeological resources are impacted. In the event that archaeological resources are unearthed during project subsurface activities, all earth disturbing work within a radius to be determined by the monitoring archaeologist must be temporarily suspended or redirected until the monitoring archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume.
- AR-2** If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who may then serve as a consultant on how to proceed with the remains (i.e., avoid, reburial).

Adverse Impacts After Mitigation (Alternatives 2 and 3)

With implementation of mitigation measures, impacts to archaeological resources from either Alternative 2 or 3 would be less than significant.

4.11.3 HISTORIC ARCHITECTURE

The following analysis incorporates information from the Cultural Resources Technical Report, Proposed Renovation of Hall of Justices, Los Angeles, California, prepared by Historic Resources Group Consultants in May 2003. This report can be found in Appendix 4.11(B) of this EA/EIR.

4.11.3.1 AFFECTED ENVIRONMENT

Historical Designations

A property may be designated as historic by national, state, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated. The Hall of Justice has been determined eligible to be listed in the National Register and the California Register of Historical Resources. The building is not designated at the local level. An explanation of these designations follows.

National Register of Historic Places

The Hall of Justice has been determined eligible for listing in the National Register of Historic Places. The State Office of Historic Preservation made this determination.

The National Register of Historic Places is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The National Park Service administers the National Register. However, the federal regulations explicitly provide that National Register listing of private property "does not prohibit under federal law or regulation any actions which may otherwise be taken by the property owner with respect to the property." Listing in the National Register assists in preservation of historic properties through:

- Recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects;
- Eligibility for federal tax benefits; consideration in the decision to issue a surface coal mining permit; and
- Qualification for federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. State and local laws and regulations may apply to properties listed in the National Register.

California Register of Historical Resources

The Hall of Justice is listed in the California Register of Historical Resources. The California Register is an authoritative guide in California used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

The criteria for eligibility for listing in the California Register are based upon National Register criteria. The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register of Historic Places (Category 1 in the State Inventory of Historical Resources) and those formally Determined Eligible for listing in the National Register of Historic Places (Category 2 in the State Inventory).
- California Registered Historical Landmarks from No.0770 onward.
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion in the California Register.

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

- Historical resources with a significance rating of Category 3 through 5 in the State Inventory. (Categories 3 and 4 refer to potential eligibility for the National Register, while Category 5 indicates a property with local significance.)
- Individual historical resources.
- Historical resources contributing to historic districts.
- Historical resources designated or listed as a local landmark.

The Hall of Justice was automatically listed in the California Register because it was determined eligible for listing in the National Register, or Category 2 in the State Historical Resources Inventory. The building was officially determined eligible by the Federal Emergency Management Agency (FEMA) and State Historic Preservation Office (SHPO).

History of Hall of Justice

The Hall of Justice was designed in 1925 by the Allied Architects Association as part of the Los Angeles City-County Civic Center, a complex of buildings intended to house City, County, and federal offices in downtown Los Angeles. In addition to the Hall of Justice, the Civic Center was originally planned to include the Los Angeles City Hall, the Los Angeles Public Library, a Hall of Records, and various other structures for County and federal departments. As a single building, which accommodated a wide range of public services, the Hall of Justice represented an effort to create a streamlined criminal justice system. All levels of the County criminal justice system were housed in the Hall of Justice, giving the building a strong presence in the community and reinforcing the City and County's commitment to law enforcement.

Developed by the County of Los Angeles, the Hall of Justice cost just over six million dollars to construct. At the time of its completion in 1926, it was the largest building in Los Angeles County.¹ The structure was designed with elements of the Beaux-Arts Classicism and Italian Renaissance styles; the building integrated the criminal justice system by providing space for various departments and organizations in one building. The exterior presented an imposing edifice of strength and control, while the interior design accommodated the diverse needs of the County's criminal justice system. The building included the latest technical innovations, emergency telephones for guards in the jail and a 1st-floor morgue with spaces for sixty-eight bodies which, according to the *Los Angeles Times*, "may be kept indefinitely in air-tight, glass-enclosed cells."² Although built by the County, the Hall of Justice was intended to be used by other civic entities as well. A 1925 issue of *Southwest Builder and Contractor* reported that the "Los Angeles City Council has decided to enter into contract with the County for space for the police department, police courts, receiving hospital and City prosecutor in the new Hall of Justice at an annual rental of \$67,760."³

The commitment to all levels of criminal justice was reinforced by the building's interior design. When it opened in 1926, the Hall of Justice included spaces for the sheriff's department, County jail, district

¹ Hector Tobar, "Crime and Punishment". *Los Angeles Times*, 23 February 1993, page B3.

² *Ibid.*, page B3.

³ *Southwest Builder and Contractor*, 23 January 1925, page 47.

attorney's office, City attorney, prosecuting attorney, municipal and superior courts, and the coroner. It has been described as "a masterpiece of practical design" that combined "a jail in the upper four stories...with a complex of courtrooms on the floors just below and offices for the district attorney and other law enforcement agencies at the bottom."⁴ The public spaces, including a grand entrance lobby, occupied the first two floors of the building. Offices for the sheriff's department were housed on the 2nd through 6th floors. The district attorney's office was on the sixth floor, and the courts were located on the 7th and 8th floors, with the high ceilings of the courtrooms extending up through the 9th floor. The judges' chambers and jury rooms were also located on the 8th floor. The uppermost five floors housed the jail cellblocks, visitation areas, medical facilities, and a kitchen. Finally, the roof served as an inmate recreation area, library, and laundry.

This division of interior space mirrored the tripartite division of the exterior façades of the building. The divided facades were designed to reflect the three parts of a classical column, but this exterior division also paralleled the interior configuration of the building. The interior spaces were divided into three major groups, and this division was reflected in the allocation of floor levels. The groups of spaces included public circulation areas (floors 1-2), law enforcement and judiciary (floors 2-9), and prisoner detention (floors 10-14). This distinct division of interior use was echoed in the exterior tripartite design.

Architectural Description

Construction and Massing

The regular massing and symmetrical design of the Hall of Justice are two of the building's most prominent visual characteristics. The building is rectangular in plan with a substantial footprint. It is fourteen stories high, not including a basement level, an equipment storage penthouse at the roof level, and a distinctive mansard parapet, which rises above the roofline. Each of the four exterior facades is symmetrical in massing and features identical wall finishes, fenestration patterns, and repeating ornamental elements. The total height of the building is approximately 195 feet, measured from grade to the mansard roof parapet. The basement occupies approximately 41,500 square feet, while the 1st through 14th floors occupy approximately 35,000 square feet each. The gross floor area of the building is, thus, approximately 537,585 square feet.

The building is of steel-frame and concrete construction. The 14-story structure was constructed with riveted steel frames composed of beams and columns encased in unreinforced concrete. Around the

⁴ Allan Parachini, "Policies Handcuff Old Jail, Hall of Justice Facilities Unused Since 1979." *Los Angeles Times*, 15 July 1981, part V, page 6.

perimeter of the building, the concrete encasement is enlarged and reinforced to form the exterior structural wall panels. In the basement, the perimeter exterior walls are 42 inches thick and also function as retaining walls. The penthouses at the roof, which shelter the elevator hoisting equipment, were constructed of concentrically braced steel frames encased in concrete. The roof parapet is composed of steel trusses, which hold the roofing tiles and enclose the jail's exercise area.

Exterior

The exterior design of the Hall of Justice incorporates elements from the Beaux-Arts Classicism and Italian Renaissance styles of architecture. As the style adopted for many public and government buildings in the United States between 1880 and 1930, Beaux-Arts Classicism was borne out of the pictorialism professed at the Ecole des Beaux-Arts in Paris in the 19th Century. Identified by such characteristics as symmetrical facades, light colored walls, elaborate detailing, and decorative ornamentation, this style is often described as grandiose and monumental. The Italian Renaissance style was popular in the United States primarily between 1890 and 1935 and was used extensively for major building projects in metropolitan areas. Its defining characteristics include symmetrical facades, stone-veneered exterior walls, arched door surrounds, recessed porches, flat roofs, belt courses, and colonnades.

Perhaps the most notable element, which reflects the use of the beaux-arts Classicism style, is the tripartite division of the building (refer to Figures 4.5-5 and 4.5-6). This division suggests the three parts of a classical column—base, shaft, and capital. The first three floors, distinguished by the use of granite veneer stacked as flush rectangular blocks, form a visual base, which supports the rest of the building. A belt course runs the entire length of each façade between the 3rd and 4th floors. The 4th through 9th floors, with an exterior of cut granite veneer, act as the building's shaft, while the uppermost floors and roofline serve as an ornamental capital. This tripartite division is used on all four exterior facades, giving the building a strong sense of symmetry and unity.

The fenestration pattern, ornamentation, and colonnades further reinforce the symmetrical design. The 1st through 11th floors feature steel-framed, double-hung windows. The remaining upper floors have steel-framed, multi-paned windows with wire glass and decorative metal screens. The windows have operable awning sashes. The first two floors of each facade contain varying numbers of windows due to the slope of the site, but the 3rd floor of each façade has 14 window openings. The 4th through 8th floors, the shaft of the building, contain a grid pattern of identical windows. Each floor has 14 windows openings, spaced as a central group of twelve flanked by two single windows on each corner. The 10th and 11th floors feature smaller double-hung windows virtually obscured by surrounding decorative

elements. On the 9th floor, these windows sit between panels of terra cotta ornamentation, and on the 10th floor they are set in the recessed walls behind a projecting balustrade.

The terra cotta ornamentation runs the entire length of each facade beginning at the 10th floor level and continuing on each upper floor to the cornice line. The ornamentation on the 9th floor is composed of panels echoing the size of the lower wall expanses between window openings. These panels are of two types. The smaller panels have a festoon draped with ribbon set between two urns with a rosette in the center. The larger panels depict a southwestern cow skull flanked by sets of the festoons, rosettes, and urns identical to those in the smaller panels. Each façade features two larger panels at each corner and eleven smaller panels in the main body of the façade. Above these panels is a projecting balustrade supported by brackets. A terra cotta course with a Greek key design runs along the length of the walls just above the balustrade.

Behind the balustrade, and rising from the 11th to the 13th floors, is a symmetrical colonnade composed of eleven granite Doric columns in the main body of the facade. Within this colonnade, the exterior walls are recessed approximately four feet and contain multi-paned, steel-framed windows. Flanking the colonnade at the corner edges of the facades are two windows and two sets of paired square pilasters.

The 14th floor is marked by a frieze of terra cotta panels set in the same pattern as those at the 9th floor but with different motifs. The smaller panels feature various rosettes and acanthus leaves surrounding a central foliated design. The larger panels have geometric shapes flanking a central element. Set between the panels are small, steel-framed double-hung windows with a distinct square shape. A terra cotta egg-and-dart molding runs the entire length of the façade above the panels and windows. The cornice line is punctuated by terra cotta ornamentation in the forms of foliation and slightly projecting facial figures.

A hipped mansard parapet of steel and concrete construction characterizes the roof. The sloped sides of the parapet were originally finished with Cordova clay tile, but the roofing material was later changed to standing seam metal. Behind the parapet is a flat roof with a paved walking surface. Sitting atop the flat roof are penthouse storage areas used to store the elevator hoisting equipment. These penthouses are constructed of concrete, concrete block, and brick finished with exterior plaster.

Interior

When the Hall of Justice was constructed in 1925, it was designed to accommodate a wide variety of functions for the County of Los Angeles. Original interior spaces included the County morgue, offices for the tax collector, spaces for law enforcement and justice agencies, courtrooms, and the County jail.

Access to these various spaces was an important consideration, so the building was designed with various points of entry. Entrances to the building are located on the east (Spring Street) façade on the first level, and on the south (Temple Street), west (Broadway).

The use of the Hall of Justice has changed over time, but the interior configuration and spaces have remained substantially intact. Due to the specific needs of the building's tenants, each floor was designated for certain activities. The spatial configuration of each floor reflected these diverse needs, as did the varying floor-to-floor heights on each floor. A unique feature of the building is the different floor-to-floor heights, ranging from 9 feet 6 inches on the 10th floor to 17 feet on the 2nd floor.

In addition to the varying floor-to-floor heights, character-defining features of the building's interior include the use of interior light wells, original materials, and the configuration of spaces based on specific use. Interior light wells occur at and above the 1st floor at the north and south ends of the building. The south light court is further divided into two light wells at the 1st through 3rd floor levels due to corridors and offices located at the centerline of the building. These light wells provided natural light for the building and represent a significant architectural design feature.

Significant original material is present throughout the building. In the non-detention areas, the majority of the interior partition walls are hollow clay tile finished with plaster, although much of this material is cracked and otherwise damaged. In corridors and public areas, the walls have marble wainscots and bases. Ceilings are typically composed of a metal grid system with metal lath and finished with plaster with approximately 20 percent of the ceiling significantly damaged due to water. In the main lobby and courtrooms, the ceilings are decorated with ornate plaster. Floors throughout the non-detention areas consist of a combination of asbestos floor tiles, terrazzo, and marble in public areas and corridors. Most of the office spaces have hollow metal doors with glass panels. The public areas on levels seven and eight feature wood paneled doors, and the detention floors utilize steel bar grate doors. Many of the doors include sidelights and transoms; some have original locksets. The restrooms are also significant spaces with original material. Most of the restrooms have ceramic tile wainscots, marble toilet partitions with paneled hollow metal doors, and terrazzo floors.

Many of the spaces in the Hall of Justice were designed to serve a specific purpose. The layouts of these spaces are significant and character-defining features of the building. For example, portions of the 1st and 2nd floors were designed as the primary public spaces. As such, they include large lobby spaces and circulation corridors that provide access to the entire floor. The 3rd through 6th floors accommodated various offices, so the configuration is a simple layout of corridors connecting to office suites with a central elevator lobby. The 7th and 8th floors housed the courtrooms, requiring a configuration of large

spaces interspersed with smaller offices. Finally, the 10th through 14th floors were designed to serve as detention floors and consist of a series of regularly patterned cellblocks. The unique spatial configuration of the floors is an important aspect of the building and reflects its original function as a multi-use public structure.

The means of circulation, namely the stairways and elevators, are also character-defining features of the building's interior. The main stairways are located at the northwestern side of the south light court and at the northeastern side of the north light court. Significant characteristics of the original staircases include marble wainscots, iron treads and risers, decorative iron and hardwood railings, and decorative iron newel posts. The staircases in the detention areas have plain iron railings and posts. In addition to the stairways, circulation is provided by a central bank of elevators. The elevators run from the 1st floor up to the 8th floor and are accessed through a central elevator lobby. The configuration of the elevator lobby space is the same on floors one through eight, and these spaces retain such original material as marble walls and a plaster cornice. The elevator cabs retain the original Llewellyn cast iron housing, hardwood interior paneling, and control hardware.

Grand Lobby

The grand lobby is located in the center of the building on the 2nd floor and serves as the main public entrance area. It is characterized by a wide, open space and intricate decorative details. The lobby is accessed by a stairway at a higher entrance on the west elevation and extends to a similar entrance on the east elevation. The lobby then branches to the south and reaches to an altered south corridor which extends to an entrance at the south elevation. An interior bridge spans the east lobby entrance, connecting the north and south portions of the 2nd floor.

Significant features of the grand lobby include vaulted and coffered plaster ceilings with decoratively painted finishes, hollow clay tile walls finished with marble veneer, and marble columns with Ionic marble capitals. Decorative pendant lighting fixtures are suspended from the ceiling. A monumental staircase sits in the main lobby and provides a grandiose entry into the building. The staircase has marble treads and risers, and plain tubular bronze railings and newel posts.

Courtrooms

The courtrooms are located on the 7th and 8th floors of the Hall of Justice. These two floors contain a mixture of large, open spaces, which served as courtrooms and smaller, confined spaces, which served as offices and chambers. Most of the larger spaces have been modified or reconfigured over the years. The spaces used for courtrooms are located along the perimeters of all four walls. The majority of these spaces feature hollow clay tile walls finished with plaster and original wood paneled doors, most of which show moderate to severe damage. Several of the courtrooms have hardwood wall paneling, ornamental plaster ceilings and friezes, and decorative iron radiator grilles. The configuration of these courtroom spaces and the remaining original fabric are character-defining features and echo the original design and intent of the building.

Jail Cells

The cellblocks are original spaces of the building and are located on the 10th through 14th floors. They consist of a range of single-story cells varying in number from eight to eighteen depending on the floor level. Access to each cellblock is provided through a secure vestibule with bar grate swinging gates. These vestibules commonly serve two or more cell groupings. The inmate area is secured by a continuous perimeter of steel, primarily in the form of bar grates, which separate the inmate and staff circulation areas. Indirect natural light enters the cellblocks through windows along the interior light wells and along the street side exterior elevations.

The typical inmate cell is made of steel plates with bar grate fronts attached by steel angles to the concrete structure at the floor and ceiling. The cell is furnished with wall-mounted accessories, including two steel bunks, a vitreous china lavatory, and a toilet. The cells have manual sliding doors with individual and gang release capabilities controlled from a panel at the end of the cellblock.

Each of the detention floors, ten through thirteen, contain a core area with varying functions related to inmate management. The 10th floor core has a visiting area allowing for contact and the inmate dining area. The 11th floor contains shower, dressing, and property storage areas. The 12th floor core was used for non-contact visitation, and the 13th floor contained a variety of program spaces. The 14th floor contained the kitchen and infirmary. Each of these core areas provided space for essential activities associated with the Hall of Justice detention system.

Character-Defining Features

The Hall of Justice retains many of its exterior and interior character-defining features. These features define the building and contribute to its significance as a monumental work of architecture and as an important piece of local history. Character-defining features are identified in Table 4.11-1, **Character-Defining Features of the Hall of Justice**. This table was prepared as part of an independent review of the existing conditions of the Hall of Justice by Historic Resources Group in August 2001.

**Table 4.11-1
Character-Defining Features of the Hall of Justice**

Item No.	Level	Space or Feature
EXTERIOR		
1	All above-grade	<i>Building and setting</i> Configuration of building footprint, height and volume; yards, and their relationships to public entrances and sidewalks; setbacks; yards; paved areas; landscaped areas.
2	All above-grade	<i>Exterior walls</i> With few exceptions, such as window-mounted air conditioning units, all extant exterior features are character defining. Included are masonry, doors and doorframes and hardware, windows and window frames and hardware, and standing seam metal.
2.1	All	Windows
2.2	All	Light wells
INTERIOR		
3	B-Roof	<i>Floor structures and elevations</i>
4	B	<i>Vehicular door and ramps</i>
5	B	<i>Skylight</i> Concrete frame and glass block skylight at the base of the light well (abandoned and roofed over).
6	B	<i>Service elevator</i> Cab, Llewellyn cast iron control housing
7	B-Roof	<i>Stairwells and stairs</i> Those in their original locations, open wells and relationships to original corridor configurations. Characteristics of stairs include marble wainscots, decorative iron and hardwood railings, undecorated iron railings in detention areas, and original risers and treads.
8	1-Roof	<i>Fire escapes</i>
9	1-9	<i>Terrazzo floor finishes</i>
10	1-8	<i>Corridors:</i> Configuration, walls and ceilings of those corridors, which have plaster and lath ceilings, plaster and lath walls, and in many cases marble wainscots.

Item No.	Level	Space or Feature
11	1-8	<i>Elevator lobbies</i> Configuration of space; elevator cab openings; marble walls; plaster cornice.
12	1-8	<i>Doors</i> Paneled doors, painted hollow metal, glazed or unglazed; Paneled doors, simulated-wood grain painted on metal, glazed or unglazed; Door locksets; Sidelights and transoms associated with doors 10-panel wood doors found on floors 7 and 8
13	1-8	<i>Toilets</i> Marble W.C. stall partitions, hardware, and hollow metal doors; White glazed tile wainscots; Terrazzo floors; Original fixtures, fittings and accessories.
14	1	Room with glazed white tile walls on west wall of light well.
15	B-8	<i>Lighting fixtures</i> Ceiling-mounted fixtures with circular metal bases and white or obscure glass shades; Enameled metal ceiling pendant up-lights (level 6)
16	Lobby (betw. 1 & 2)	<i>Main lobby</i> Wide space and stairs which extend from a higher entrance with metal doors and frames on the west elevation down to a similar entrance on the east elevation, and a south corridor (altered) which extends to a similar lobby entrance at the south elevation. Significant features include coffered plaster ceilings, decorative pendant lighting fixtures, metal railings, stone columns, stone walls, vaulted plaster ceilings with decoratively painted finishes, elevator dial, and an interior bridge which spans the east lobby entrance, connecting the north and south portions of the 2 nd floor.
17	1-9	<i>Marble floor bases</i>
18	1-Roof	<i>Light well</i> Rectangular configuration; bisected with corridor at floors 1 to 3; glazed brick walls; steel windows and glazing.
19	7	<i>Decorative iron radiator grilles</i> East wall, under window openings.
20	7-8	<i>Hardwood wall paneling</i> Stained, or stained and subsequently painted.
21	7-8	<i>Courtroom suites</i> The configuration of courtrooms, associated judges chambers, law library space, corridors and stairways leading up to the 9 th floor and detention spaces are character-defining.
22	7-8	<i>Decorative plaster ceilings and friezes</i>
23	7-8	<i>Decoratively painted walls</i> Plaster walls scored and painted to simulate stone walls.
24	8	<i>Hardwood door with security grille</i> Secure space in southwest quadrant.
25	8	<i>Elevator cabs</i> (parked at level 8) Hardwood paneling; original control hardware, including Llewellyn cast iron housing
26	9	<i>Wood and textured glass stairway enclosures</i>

Item No.	Level	Space or Feature
27	9	Holding "tank" space and security bar grilles
28	10	Jail entrance, visitors room, day room for prisoners
29	10-13	Painted plaster scored to resemble brick as in a running bond pattern
30	10-13	Corridors, vestibules, stairs, cells, cell block configuration, bar grilles, cell door controls, original hinged bed frames
31	13	Day room and stairs at southwest corner
32	14	Configuration of corridors, dining rooms, and kitchen
33	14	Solitary cell block (2 cells) in southeast quadrant
34	15	Roof configuration
35	All	Structural system
36	All	Hollow clay tile partitions

4.11.3.2 THRESHOLDS OF SIGNIFICANCE

California Environmental Quality Act

Under the California Environmental Quality Act (CEQA), adopted in 1970 and most recently revised in 1998, the potential impacts of a project on historical resources must be considered. The purpose of CEQA is to evaluate whether a proposed project may have an adverse effect on the environment and, if so, if that effect can be reduced or eliminated by pursuing an alternative course of action or through mitigation measures.

The impacts of a project on an historical resource may be considered an environmental impact. Section 21084.1 of the California Public Resources Code states:

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

For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources.

Thus, under CEQA, an evaluation of project impacts requires a two-part inquiry: a determination of whether or not the resource is historically significant and a determination of whether the project will result in a "substantial adverse change" in the significance of the resource.

Historic Significance

A building is considered historically significant, and therefore an "historical resource" under CEQA if it meets the criteria for listing in the California Register of Historical Resources. Buildings formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register.⁵ The Hall of Justice is, therefore, considered an "historical resource" under CEQA because it has been determined to be eligible for listing in the National Register of Historic Places.

Determination of Impacts

In determining potential impacts, a "substantial adverse change" means "demolition, destruction, relocation, or alteration of the resource such that the significance of an historical resource would be materially impaired."⁶ 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 an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
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 an 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.⁷

CEQA regulations identify the Secretary of the Interior's Standards as the measure to be used in determination of whether or not a project adversely impacts an "historical resource". Section 15064.5(b)(3) of the CEQA *Guidelines* 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 Grimer, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

⁵ See Cal. Public Resources Code 5024.1(c)

⁶ See Cal. Public Resources Code 5020.1(q).

⁷ State CEQA *Guidelines*, 15064.5(b)(2).

Moreover, projects which strictly adhere to the Secretary of the Interior's Standards may be determined categorically exempt in that they have been determined not to have a significant effect on the environment, thus, exempting it from the provisions of CEQA.⁸ However, the categorical exemption is not permitted when a project "may cause a substantial change in the significance of a historical resource."⁹

The Secretary of the Interior's Standards are as follows:¹⁰

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

⁸ State CEQA Guidelines 15300 and 15331.

⁹ State CEQA Guidelines 15300.2(f).

¹⁰ Weeks, Kay D. and Anne E. Grimmer. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, or Reconstructing Historic Buildings*. Washington, D.C.: U.S. Department of the Interior, 1995, p.62.

Therefore, in determining the impact of a project on an "historical resource," CEQA and the CEQA *Guidelines* require the application of the Secretary of the Interior's Standards to the question of whether the project demolishes or alters the resource, in particular those physical characteristics of the historical resource that convey its historical significance. The physical characteristics that convey significance are also referred to as the character-defining features of the building.

National Historic Preservation Act/National Environmental Policy Act

The significance of impacts to historic resources under NEPA is based on the standards of review under Section 106 of the National Historic Preservation Act (NHPA). Section 106 of the NHPA requires federal agencies to take into account the effect of their undertaking on historic properties and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. In accordance with the Advisory Council on Historic Preservation's regulations implementing Section 106 of the NHPA (36 CFR Part 800, *Protection of Historic Properties*), impacts to resources and the cultural landscape are identified and evaluated by the Section 106, Step by Step process as follows: (1) undertaking determination; (2) determining the area of potential effects; (3) identifying historic properties; (4) assessing effects; and (5) actions to follow after assessing effects. These steps are further discussed below:

Undertaking Determination

The agency initiating a project determines if the proposed project or action is an undertaking by deciding whether the proposed action could result in changes in the character or use of any historic properties. It is important to remember that the agency does not need to know whether historic properties are present or if they will be subject to change.

Determining Area of Potential Effects

If the action is an undertaking, the agency must next determine the undertaking's "area of potential effects," which is defined as "the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist," [36 CFR 800.2(c)]. It is not necessary to know that the area in question contains historic properties, or even to suspect that such properties exist, in order to determine the area of potential effects. The area of potential effects is not always a contiguous area; there may be multiple alternative project sites or multiple areas in which changes are anticipated.

Identifying Historic Properties

The first requirement in identification is that the agency review all available information that can help it determine whether historic properties might be in the area of potential effects. The agency must make a reasonable and good faith effort to locate historic properties that may be affected by the undertaking, and gather enough information to evaluate the properties' eligibility for listing in the National Register.

When properties are found that may be historic but have not been evaluated, it is the agency's responsibility to decide whether the properties are eligible for the National Register. The agency and SHPO consult about eligibility for each property within the area of potential effects. If the property is found to be ineligible the Section 106 review is completed. If the property is found to be eligible the effects of the undertaking on the property must be assessed.

Assessing Effects

Once the agency has identified eligible historic properties, it then determines whether its proposed undertaking could affect the properties. The criteria of effect and adverse effect are used to determine potential effects on historic properties. The criterion of effect states that "an undertaking has an effect on a historic property when the undertaking may alter characteristics of the property that may qualify the property for inclusion in the National Register." [36 CFR 800.9(b)] The criteria of adverse effect states that "an undertaking is considered to have an adverse effect when the effect on a historic property may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." [36 CFR 800.9(b)]

When applying the criteria of effect and adverse effect, there are three possible findings:

- **No Effect:** There is no effect of any kind, neither harmful nor beneficial, on the historic properties.
- **No Adverse Effect:** There could be an effect, but the effect would not be harmful to those characteristics that qualify the property for inclusion in the National Register.
- **Adverse Effect:** There could be an effect, and that effect could harm characteristics that qualify the property for inclusion in the National Register.

Actions to Follow After Assessing Effects

If the project will have no effect on historic properties, the proposed undertaking may proceed. If the project will have no adverse effect on historic properties, the agency must submit project documentation

to Council for concurrence. If the project will have an adverse effect on historic properties, the agency must begin consultation with the SHPO and Council to minimize the adverse effect.

4.11.3.3 POTENTIAL IMPACTS OF ALTERNATIVES

Alternative 1 – No Project Alternative

Under the No Project Alternative, the project site would remain in its present state. No impacts to historic architecture would occur with the implementation of this alternative. The building would continue to deteriorate. This alternative would result in adverse effect under the Historic Preservation Act due to the undertaking resulting in the neglect of a property resulting in its deterioration.

Alternative 2 – Repair and Reuse Alternative (Proposed Alternative)

California Environmental Quality Act

The proposed project rehabilitates and repairs some of the character defining features of the Hall of Justice, but demolishes or alters others. Character defining features are identified in Table 4.11-1. Proposed work items, the presence of character defining features in the area of work, and potential impacts are identified in Table 4.11-2, **Proposed Renovation Work**.

**Table 4.11-2
Proposed Renovation Work**

No.	Proposed Work Item	Character-Defining Feature (as defined in Table 4.11-1)	Potential Impact
EXTERIOR WORK			
A-1	Clean, repair, and re-point joints at exterior of building as required: stone, terra cotta, and unreinforced masonry (URM).	<i>Exterior walls</i> Item #2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-2	Clean and refurbish bronze entry doors and frames at Spring Street, Temple Street, and Broadway.	<i>Exterior walls</i> Item #2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-3	Replace broken glass at windows and remove AC units throughout.	<i>Windows</i> Item #2.1	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-4	Refurbish window frames and remove loose flaking lead paint throughout (1 to 14).	<i>Windows</i> Item #2.1	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-5	Provide new vision glass at windows on floors 10 through 14. Steel frames and light dividers to remain in present configuration.	<i>Windows</i> Item #2.1	Yes Removal of historic material (obscure glass) identified as character-defining feature of the building. Less impact if work is conducted according to Secretary of the Interior's Standards.
A-6	Provide concealed pin anchors at each piece of stone.	<i>Exterior walls</i> Item #2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-7	Strengthen terra-cotta cornice and repair as required.	<i>Exterior walls</i> Item #2	No No impact if work is conducted according to Secretary of the Interior's Standards.

No.	Proposed Work Item	Character-Defining Feature (as defined in Table 4.11-1)	Potential Impact
A-8	Clean and repair metal, and re-point stone spandrels at 12 th and 13 th floors as required.	<i>Exterior walls</i> Item #2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-9	Repair URM at light courts.	<i>Light wells</i> Item #2.2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-10	Clean and re-point URM at light courts, as required.	<i>Light wells</i> Item #2.2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-11	Strengthen URM at light courts.	<i>Light wells</i> Item #2.2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-12	Provide limited exterior building lighting.	<i>Exterior walls</i> Item #2	No No impact if work is conducted according to Secretary of the Interior's Standards.
A-13	Clean and repair existing sloping copper roof. Green patina to remain.	<i>Exterior walls</i> Item #2	No No impact if work is conducted according to Secretary of the Interior's Standards.
INTERIOR			
B-1	Provide new poured-in-place concrete shear wall seismic resisting elements at corners of building. Provide drag struts at interior face of exterior wall between shear walls at each floor slab.	<i>Windows</i> Item #2.1 <i>Floor structures and elevations</i> Item #3 <i>Terrazzo floor finishes</i> Item #9	No No impact if work is conducted according to Secretary of the Interior's Standards.

No.	Proposed Work Item	Character-Defining Feature (as defined in Table 4.11-1)	Potential Impact
B-2	Remove all interior partitions including hollow clay tile (HCT) partitions, finished with plaster or other materials, including exterior wall furring throughout the building (except at 2 nd floor lobby and 1 st floor corridor adjacent to loggia). Remove all suspended ceilings, flooring, and equipment, except as noted herein.	<i>Corridors</i> Item #10 <i>Elevator Lobbies</i> Item #11 <i>Decorative plaster ceilings and friezes</i> Item #22 <i>Decoratively painted walls</i> Item #23 <i>Hollow clay tile partitions</i> Item #36	Yes Removal of historic material identified as character-defining features of the building.
B-3	Restore, clean, and refurbish 2 nd floor lobby/loggia.	<i>Main Lobby</i> Item #16	No No impact if work is conducted according to Secretary of the Interior's Standards.
B-4	Restore, clean, and refurbish 2 nd floor corridor. Remove marble panels, doors, sidelights, HCT, and reinstall marble panels over metal stud support partitions (except at 2 nd floor lobby and 1 st floor corridor adjacent to loggia). Restore/refurbish and reinstall doors, sidelights, base and lighting fixtures as possible. All ceilings to be new except at grand lobby/loggia and 1 st floor corridor adjacent to loggia, which is to be restored.	<i>Corridors</i> Item #10 <i>Doors</i> Item #12 <i>Lighting Fixtures</i> Item #15 <i>Marble Floor Bases</i> Item #17	Yes Removal of historic material identified as character-defining features of the building and alteration of a historic space.
B-5	Restore, clean, and refurbish 8 th floor corridor. Remove marble panels, doors, sidelights, HCT, and reinstall marble panels over metal stud support partitions. Restore/refurbish and reinstall doors, sidelights, base and lighting fixtures as possible. Ceilings to be new compatible.	<i>Corridors</i> Item #10 <i>Doors</i> Item #12 <i>Lighting Fixtures</i> Item #15 <i>Marble Floor Bases</i> Item #17 <i>Hardwood wall paneling</i> Item #20 <i>Decorative plaster ceilings and friezes</i> Item #22 <i>Decoratively painted walls</i> Item #23 <i>Hardwood door with security grille</i> Item #24	Yes Removal of historic material identified as character-defining features of the building and alteration of a historic space.

No.	Proposed Work Item	Character-Defining Feature (as defined in Table 4.11-1)	Potential Impact
B-6	Restore and refurbish Room (819) on the 8 th floor. Retain 2-story ceiling and wood wall paneling.	<i>Hardwood wall paneling</i> Item #20 <i>Decorative plaster ceilings and friezes</i> Item #22 <i>Decoratively painted walls</i> Item #23	Yes Removal of historic material identified as character-defining features of the building. The loss of HCT walls and historic finishes is a significant impact.
B-7	Remove existing suspended plaster and metal lath ceiling on all floors throughout the building, except at 2 nd floor grand lobby/loggia and 1 st floor adjacent to loggia.	<i>Decorative plaster ceilings and friezes</i> Item #22	Yes Removal of historic material identified as character-defining features of the building and alteration of a historic space.
B-8	Restore, clean, and refurbish historic stairs. Total of 4 stairs, floors 1 through 9. Remove HCT, URM, and marble, and reinstall marble panels, over metal studs.	<i>Stairwells and stairs</i> Item #7	Yes Removal of historic material identified as character-defining features of the building. The removal of HCT walls is a significant impact.
B-9	Provide new men's and women's toilets using new compatible materials, terrazzo floor, ceramic tile wainscot, marble toilet partitions to match existing, wood toilet partition doors, stone sink counter, and new compatible lighting fixtures. Re-use existing marble toilet partitions where possible.	<i>Toilets</i> Item #13	Yes Removal of historic material identified as character-defining features of the building. Toilet rooms on floors 1 through 8 have been identified as character-defining. Stall partitions, hardware, hollow metal doors, white glazed tile wainscots, terrazzo floors, and original fixtures, fittings, and accessories have been identified as character-defining features.

No.	Proposed Work Item	Character-Defining Feature (as defined in Table 4.11-1)	Potential Impact
B-10	Restore, refurbish, and provide new elevator lobbies on each floor. Use existing wainscot at elevator door wall on floors 3 through 8. A combination of new and existing restored and refurbished terrazzo will be provided.	<i>Elevator lobbies</i> Item #11	Yes The removal of the HCT walls will be a significant impact because the HCT is identified as a character-defining feature of the building. The configuration changes of the elevator lobbies will be a significant impact because the original arrangement of the interior space is being changed. Use of some refurbished materials, such as terrazzo, in the manner described may not meet the Secretary of the Interior's Standards.
B-11	Remove, restore, and refurbish wood wall panel interior of 6 passenger elevator cars. Reinstall into new elevator equipment.	<i>Elevator cabs</i> Item #25	Yes Removes historic fabric identified as character-defining features of the building.
B-12	Extend passenger elevator shafts for elevators 2 nd and 3 rd from 8 th floor to existing 14 th floor. Provide new elevator system, including machines, guide rails, and control system. Elevators will have stops as follows: High Rise Bank Elevator 1: Basement, 1, 2, 8-14; Elevators 2 & 3: 1, 2, 8-14; Low Rise Bank Elevator 4: Basement, 1-8; Elevators 5, 6, & 7: 1-8; Freight Elevator: Basement, 1-14.	<i>Floor structures and elevations</i> Item #3 <i>Corridors and cell block configuration</i> Item #30	Yes Removes historic fabric identified as character-defining features of the building.
B-13	Demolish 11 th and 13 th existing jail floors, and structures at penthouse level.	<i>Floor structures and elevations</i> Item #3 <i>Corridors and cell block configuration:</i> Item #30	Yes Removes character-defining features.

No.	Proposed Work Item	Character-Defining Feature (as defined in Table 4.11-1)	Potential Impact
B-14	Provide compatible ceilings, and floor materials throughout.	<i>Corridors</i> Item #10 <i>Marble floor bases</i> Item #17 <i>Decorative ceilings</i> Item #22 <i>Corridors and cell block configuration</i> Item #30	Yes Removes historic fabric. Ceilings of corridors that are constructed of plaster and lath have been identified as character-defining features. Less impact if work is conducted according to Secretary of the Interior's Standards.
B-15	Retrofit and refurbish exiting stairs "A" and "B" to comply with Code, and register at each floor.	None	No
B-16	Tenant improvement work shall be developed in accordance with the project architectural program completed by the County of Los Angeles Chief Administrative Office (CAO).	<i>Windows</i> Item #2.1	No No impact if work is conducted according to Secretary of the Interior's Standards. Tenant improvement work should be designed to avoid blocking windows.
B-17	Refurbish/repair existing terrazzo and marble flooring in areas to be retained in their historic configuration, such as corridors on levels 2 and 8, and elevator lobbies.	<i>Terrazzo floor finishes</i> Item #9	No No impact if work is conducted according to Secretary of the Interior's Standards.
B-18	Remove jail cells, partitions and stairs on 10 th , 12 th , and 14 th floors.	<i>Stairwells and stairs</i> Item #7 <i>Jail Entrance, etc.</i> Item #28 <i>Painted plaster, etc.</i> Item #29 <i>Corridors, vestibules, stairs, cells, cell block configurations, etc.</i> Item #30	Yes Removes character-defining spaces, features, and materials.
B-19	Demolish existing non-code compliant fire escapes at north and south sides of building.	<i>Fire escapes</i> Item #8	Yes Removes character-defining feature.
SITE WORK			
C-1	Create Spring Street Plaza in a compatible manner.	<i>Building and setting</i> Item #1	No No impact if work is conducted according to Secretary of the Interior's Standards.

No.	Proposed Work Item	Character-Defining Feature (as defined in Table 4.11-1)	Potential Impact
C-2	Maintain existing planter walls at the southeast portion of the site.	<i>Building and setting</i> Item #1	No
C-3	Provide new landscaping and maintain approximately 22 existing trees.	<i>Building and setting</i> Item #1	No No impact if work is conducted according to Secretary of the Interior's Standards.
C-4	Provide new sidewalks and curb cuts.	<i>Building and setting</i> Item #1	No No impact if work is conducted according to Secretary of the Interior's Standards.
PARKING STRUCTURE			
D-1	Provide 1,000 car parking structure in accordance with County standards, 4 1/2 levels above grade and 4 1/2 levels below grade.	<i>Building and setting</i> Item #1	No No impact if design is compatible according to Secretary of the Interior's Standards (massing, scale, finishes, etc.).
D-2	The exterior building massing of the parking structure is designed to not impact the Hall of Justice. The top of the parking structure parapet shall not exceed the top of the 4 th floor stone cornice of the Hall of Justice. The Parking structure is located 60 feet from the Hall of Justice and is designed with an architectural pre-cast concrete skin to be compatible with the exterior of the Hall of Justice.	<i>Building and setting</i> Item #1	No No impact if design is compatible according to Secretary of the Interior's Standards (massing, scale, finishes, etc.).
D-3	Provide loading/delivery area.	<i>Building and setting</i> Item #1	No No impact if design is compatible according to Secretary of the Interior's Standards.
D-4	Provide elevators (two), stairs, and ADA parking spaces as required by code.	<i>Building and setting</i> Item #1	No impact if located within new compatible parking structure.

Discussion of Impacts

The proposed scope of work would alter or remove a number of historic features of the building. The following work items have been determined to have a potential impact.

- A-5 Provide new vision glass at windows on 10th through 14th floors.

- B-2 Remove all interior partitions including hollow clay tile (HCT) partitions, finished with plaster or other materials, including exterior wall furring throughout the building (except at 2nd floor lobby and 1st floor corridor adjacent to loggia). Remove all suspended ceilings, flooring, and equipment, except as noted herein.

- B-4 Restore, clean, and refurbish 2nd floor corridor. Remove marble panels, doors, sidelights, HCT, and reinstall marble panels over metal and support partitions (except at 2nd floor lobby and 1st floor corridor adjacent to loggia). Restore/refurbish and reinstall doors, sidelights, base and lighting fixtures as possible. All ceilings to be new except at grand lobby/loggia, and 1st floor corridor adjacent to loggia, which is to be restored.

- B-5 Restore, clean, and refurbish, 8th floor corridor. Remove marble panels, doors, sidelights, HCT, and reinstall marble panels over metal stud support partitions. Restore/refurbish and reinstall doors, sidelights, base and lighting fixtures as possible. Ceiling to be new and compatible.

- B-6 Restore and refurbish Room 819 on the 8th floor. Retain 2-story ceiling and wood wall paneling.

- B-7 Remove existing suspended plaster and metal lath ceiling on all floors throughout building except at 2nd floor grand lobby and 1st floor adjacent to loggia.

- B-8 Remove, clean, and refurbish historic stairs. Total of four stairs on 1st through 9th floors. Remove HCT, URM, and marble panels, and reinstall marble panels over metal studs.

- B-9 Provide new men's and women's toilets using new compatible materials, including terrazzo floor, ceramic tile, wainscot, marble toilet partitions to match existing, wood toilet partitions doors, stone sink counter, and new compatible lighting fixtures. Re-use existing marble toilet partitions where possible.

- B-10 Restore, refurbish, and provide new elevator, lobbies on each floor. Use existing wainscot at elevator door wall on 3rd through 8th floors. A combination of new and existing restored and refurbished terrazzo would be provided.
- B-11 Remove, restore, and refurbish wood wall panel interior of the 6 passenger elevator cars. Reinstall into new elevator equipment.
- B-12 Extend passenger elevator shafts for elevators 2 and 3 from the 8th to the 14th floor. Provide new elevators system, including machines, guide rails, and control system.
- B-13 Demolish 11th and 13th existing jail floors and structures at penthouse level.
- B-14 Provide compatible ceiling and floor material throughout building.
- B-18 Remove all jail ceils, partitions and stairs on the 10th, 12th, and 14th floors.
- B-19 Demolish existing non-code compliant fire escapes at the north and south sides of the building.

Of these items, the removal of the HCT partition walls, the demolition of the 11th and 13th floors, and the removal of jail cells and other features on the 10th, 12th, and 14th floors, removal of courtroom suites on the 7th and 8th floors, and the reconfiguration of the 3rd through 7th floors result in the greatest loss to historic character of the building. These items are discussed in greater detail below.

Removal of Hollow Clay Tile Partition Walls

The removal of hollow clay tile partition walls from the building causes an adverse effect to the significance of the Hall of Justice because it demolishes original historic material that has been determined to be a character-defining feature. Standard #s 1, 2, 5, and 6 of the Secretary of the Interior's Standards for Rehabilitation should be considered when evaluating the proposed work :

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.

- Removing all or almost all-hollow clay tile partitions, a "distinctive" material used throughout the building, does not constitute a "minimal change". Rather, removal of this material is a major change.

- Reconfiguring historic spaces by removing historic partition walls alters historic “spaces” and “spatial relationships” to the interior of the building.

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.

- Although removal of some hollow clay tile is necessary for seismic strengthening, the proposed work removes hollow clay tile in all or almost all locations independent of structural issues. Therefore the proposed work does not “avoid” the removal of a distinctive building material.
- Reconfiguring historic spaces by removing historic partition walls alters the historic character of the property and does not attempt to “avoid” the alteration of “spaces and spatial relationships.”

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

- Hollow clay tile is a distinctive material and its use in partition walls is a distinctive construction technique that would not be preserved, except in the 2nd floor lobby area.

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.

- Although removal of some hollow clay tile is necessary for seismic strengthening, the proposed work removes hollow clay tile in almost all locations independent of structural issues. Therefore the proposed work replaces rather than repairs “deteriorated historic features.”

Based on this analysis, it is determined that the removal of hollow clay tile partition walls “...demolishes...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.” Consequently, impacts are considered to be significant.

Demolition of Floor Structures

The demolition of floor structures 11 and 13 reconfigures the basic floor structure of the building, demolishes historic spaces, and alters other historic spaces. It should also be noted that the removal of corridors, vestibules, stairs, cells, and other features has an additional negative impact (see discussion of the removal of these features on floors 10, 12, and 14 below). Standards 1 and 2 of the Secretary of the

Interior's Standards for Rehabilitation should be considered when evaluating changes to the building structure and floor plans.

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.

- Removing two entire floor structures and reconfiguring historic spaces alters historic "spaces" and "spatial relationships" to the interior.

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.

- Reconfiguring historic spaces by removing floor structures alters the historic character of the property and does not attempt to "avoid" the alteration of "spaces and spatial relationships".

Based on this analysis, it is determined that the removal of floor structures 11 and 13 "...demolishes... 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." Consequently, impacts are considered to be significant.

Removal of Jail Cells and Other Features

The removal of jails cells, walls, stairs, and other features from the 10th, 12th, and 14th floors of the building demolishes or alters character-defining features and spaces. Standard #s 1, 2, and 5 of the Secretary of the Interior's Standards for Rehabilitation should be considered when evaluating this proposed work:

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.

- Several "distinctive" materials have been identified as character-defining features on the 10th, 12th, and 14th floors and their removal does not constitute a "minimal change".
- The cellblock configuration and other aspects of these floors are considered historic "spaces" and the removal of the cells is a major change to a significant area.

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.

- The proposed work does not “avoid” the removal of distinctive building materials.
- Reconfiguring historic spaces alters the historic character of an area of major significance in the history of the building and does not attempt to “avoid” the alteration of “spaces and spatial relationships”.

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

- Distinctive material in the stairwells, and stairs, corridors, and elsewhere on these floors would not be preserved.

Based on this analysis, it is determined that the removal of jail cells and other character-defining features “...demolishes...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.” Consequently, impacts are considered to be significant.

Removal of Courtroom Suites

The removal of the courtroom suites on the 7th and 8th floors demolishes or significantly alters character-defining spaces and features of the building. Standard #s 1, 2, and 5 of the Secretary of the Interior’s Standards for Rehabilitation should be considered when evaluating this proposed work:

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.

- Several “distinctive” materials have been identified as character-defining features in the courtroom suites on the 7th and 8th floors and their removal does not constitute a “minimal change”.
- Due to their unique spatial configuration and decorative elements, these suites are considered historic “spaces” and their removal is a major change to a significant area.

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.

- The proposed work does not “avoid” the removal of distinctive building materials.
- Reconfiguring historic spaces alters the historic character of an area of major significance in the history of the building and does not attempt to “avoid” the alteration of “spaces and spatial relationships”.

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

- Distinctive materials in the courtroom suites include wood paneled walls, paneled doors, and decorative ceilings. The majority of these materials would not be preserved.

Based on this analysis, it is determined that the removal of the courtroom suites on the 7th and 8th floors "...demolishes...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." Consequently, impacts are considered to be significant.

Reconfiguration of the 3rd – 7th Floors

The reconfiguration of floors 3 through 7 significantly alters the original floor plan of the building and demolishes historic and character-defining spaces and features. Standard #s 1 and 2 of the Secretary of the Interior's Standards for Rehabilitation should be considered when evaluating changes to the configuration of the building floor plan:

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.

- Reconfiguring five floors of original spaces alters the historic "spaces" and their "spatial relationships" to the interior.

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.

- Altering historic spaces by reconfiguring the floor plan significantly impacts the historic character of the property and does not attempt to "avoid" the alteration of "spaces and spatial relationships."

Based on this analysis, it is determined that the reconfiguration of floors 3 through 7 "...demolishes...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." Consequently, impacts are considered to be significant.

National Historic Preservation Act/National Environmental Policy Act

Under the Advisory Council's regulations a determination of either *adverse effect* or *no adverse effect* must be made for National Register eligible cultural resources. An *adverse effect* occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualify it for inclusion in the National Register, e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the preferred alternative that would occur later in time, be farther removed in distance or be cumulative (36 CFR Part 800.5, *Assessment of Adverse Effects*).

The word adverse is used differently in federal and state terminology. The federal "adverse effect" defines a class of actions despite mitigation. CEQA guidance on the other hand, specifics that a project that adversely affects a historic resources has a significant effect on the environment. The proposed work would alter or remove a number of the historic features of the building. Character-defining features are identified in **Table 4.11-1**. Under the NHPA, implementation of this alternative would have an adverse effect on historic resources:

Consultation with SHPO will be conducted by FEMA. FEMA will apply the criteria of adverse effect and execute a Memorandum of Agreement stipulating the measures required to mitigate, avoid, reduce and minimize the adverse effect

Overall, the implementation of this alternative would alter character-defining feature(s) of the building but would not diminish the integrity or so impair the resource to the extent that its National Register eligibility is jeopardized. The exterior of the building would retain sufficient visual integrity to allow the resource to convey its original architectural design. The proposed exterior alterations would be limited to the removal of exterior fire escapes and the replacement of opaque glass on several of the upper floors. While these alterations materially effect the exterior of the building, its integrity would not appear be so diminished that the Hall of Justice would not be eligible for listing on the National Register of Historic Places. In addition, mitigation measures have been proposed to minimize adverse effects.

Alternative 3 – Adaptive Reuse of the Existing Building to Secretary of Interior Standards

Implementation of this alternative would result in the adaptive reuse of the existing building to the Secretary of Interior Standards. All rehabilitation would occur per the Secretary of Interior Standards and no character defining features would be altered. Consequently, impacts under this alternative would be less than significant per CEQA guidance and result in no adverse effect per NEPA/NHPA guidance.

4.11.3.4 MITIGATION MEASURES (ALTERNATIVE 2)

The following mitigation measures are required for Alternative 2:

- HA-1 Rehabilitate the exterior of the building using the Secretary of the Interior's Standards and Guidelines for Rehabilitation.
- HA-2 Identify historic elements to be re-used.
- HA-3 Salvage and store a representative sample of historical elements of value that will not be incorporated into the renovated structure such as the stone wainscot, light fixtures, glazing, and hardware. Salvage and store a representative sample of hollow clay tile material used in partition walls.
- HA-4 Develop an interpretive plan for the building that includes the use of historic photographs and artifacts, and that highlights the building within the context of the history of Los Angeles County, including the history of the Sheriff's Department.
- HA-5 Photograph and document the building according to Historic American Buildings Survey (HABS) Level 2. Incorporate this documentation into the Historic Structures Report at completion of project (see HA-6 below).
- HA-6 Complete a Historic Structures Report (HSR) for the building.

Adverse Impacts After Mitigation (Alternatives 2 and 3)

Per CEQA guidance, impacts associated with Alternative 2 would be significant and unavoidable, and with Alternative 3 would be less than significant.

Per NEPA guidance, impacts associated with Alternative 2 would be reduced to a less than significant, and Alternative 3 would be less than significant. Any resultant reduction in impact due to mitigation is an estimate of the effectiveness of mitigation under NEPA only. It does not suggest that the level of effect as defined by Section 106 is similarly reduced. Although adverse effects under Section 106 may be mitigated, the effect remains adverse.

