

# IV. Environmental Impact Analysis

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## B. Cultural Resources

### 1. Introduction

This section of the Draft EIR provides an analysis of the Project’s potential impacts on cultural resources, including historical and archaeological resources and human remains. This section is based in part on the *Historical Resource Technical Report* (Historical Report) prepared by GPA Consulting (January 2021) included as Appendix C of this Draft EIR. The analysis of potential impacts to archaeological resources and human remains is based on records searches included as Appendix D of this Draft EIR, as well as a review of previous, existing, and proposed on-site conditions.

### 2. Environmental Setting

#### a. Regulatory Framework

##### (1) Historical Resources

Historical resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historical resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, state, and local laws governing and influencing the preservation of historical resources of national, state, regional, and local significance include the National Historic Preservation Act (NHPA) of 1966, as amended, and the National Register of Historic Places (National Register); the California Environmental Quality Act (CEQA); the California Register of Historical Resources (California Register); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.120 *et seq.*), all of which are summarized below.

##### *(a) National Historic Preservation Act and the National Register of Historic Places*

The NHPA of 1966 established the National Register as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the

Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."<sup>1</sup> Under the administration of the National Park Service (NPS), the National Register recognizes properties that are significant at the national, state, and/or local levels.

*(i) Criteria*

To be eligible for listing in the National Register, a property must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history; or
- B. It is associated with the lives of persons significant in our past; or
- C. It embodies 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. It yields, or may be likely to yield, information important in prehistory or history.<sup>2</sup>

*(ii) Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin No. 15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific... property or site is understood and its meaning... is made clear." A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

*(iii) Integrity*

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in

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<sup>1</sup> Title 36 CFR 60, Section 60.2.

<sup>2</sup> Title 36 CFR 60, Section 60.4.

*National Register Bulletin No. 15* as “the ability of a property to convey its significance.”<sup>3</sup> Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

In the case of historic districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. Some buildings or features may individually have been more altered over time than others. In order to possess integrity a historic district must, on balance, still communicate its historical identity.

#### *(iv) Historic Districts*

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”<sup>4</sup>

A historic district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.<sup>5</sup> A historic district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and

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<sup>3</sup> *Title 36 CFR 60, Section 60, pp. 44–45.*

<sup>4</sup> *Title 36 CFR 60, Section 60, p. 5.*

<sup>5</sup> *Title 36 CFR Part 60.3(d).*

- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.<sup>6</sup>

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a historic district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.<sup>7</sup>

*(v) Secretary of the Interior's Standards*

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) were issued by the NPS. The Standards are accompanied by guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most common treatment is rehabilitation and is the treatment that applies to the Project. The definition of rehabilitation assumes that at least some repair or alteration of the historical building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features, or finishes that are important in defining the building's historical character.

The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding

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<sup>6</sup> *National Register Bulletin No. 21: Defining Boundaries for National Register Properties Form (Washington DC: U.S. Department of the Interior, 1997), p. 12.*

<sup>7</sup> *National Register Bulletin No. 16: How to Complete the National Register Registration Form (Washington DC: U.S. Department of the Interior, 1997), p. 16.*

conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

It is important to note that the Standards are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, nor is it necessary to comply with every Standard to achieve compliance.

*(b) California Environmental Quality Act*

CEQA requires that environmental protection be given significant consideration in the decision making process. Historical resources are included under environmental

protection. Thus, any project or action which constitutes a substantial adverse change on a historical resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

For purposes of CEQA, Public Resources Code (PRC) Section 21084.1 defines an historical resource as:

*[A] resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource.*

CEQA Guidelines Section 15064.5(a)(3) also provides additional guidance on this subject:

*[A]ny object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.*

Projects that may affect historical resources are considered to be mitigated to a level of less than significant under CEQA if they are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.<sup>8</sup> Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards.<sup>9</sup>

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<sup>8</sup> Title 14 CCR Section 15126.4(b).

<sup>9</sup> Title 14 CCR Section 15331.

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*(c) California Register of Historical Resources*

In 1992, Governor Pete Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.<sup>10</sup>

The California Register consists of properties that are listed automatically as well as 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 and those formally determined eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.<sup>11</sup>

*(i) Criteria and Integrity*

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1–4 instead of A–D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or

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<sup>10</sup> PRC Section 5024.1 (a).

4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.<sup>12</sup> A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance.<sup>13</sup>

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:<sup>14</sup>

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

*(ii) SOHP Survey Methodology*

The evaluation instructions and classification system prescribed by the SOHP in its *Instructions for Recording Historical Resources* provide a three-digit evaluation code for use in classifying potential historical resources. These are referred to as Historical Resource Status Codes (Status Codes). In 2003, the Status Codes were revised to

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<sup>11</sup> PRC Section 5024.1 (d).

<sup>12</sup> Title 14 CCR Section 4852(c).

<sup>13</sup> PRC Section 4852.

<sup>14</sup> Title 14 CCR Section 4852(d)(2).

address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the property is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this section are as follows:

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<b>2S2</b>	Individual property determined eligible for the National Register by a consensus through Section 106 process and listed in the California Register.
<b>2D2</b>	Contributor to a district determined eligible for the National Register by a consensus through Section 106 process and listed in the California Register.
<b>3S</b>	Appears eligible for the National Register as an individual property through survey evaluation.
<b>3CS</b>	Appears eligible for the California Register as an individual property through survey evaluation.
<b>5S3</b>	Appears to be individually eligible for local listing or designation through survey evaluation.
<b>6Z</b>	Found ineligible for National Register, California Register, or local designation through survey evaluation.

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*(d) City of Los Angeles General Plan Conservation Element*

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

affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>15</sup>

The City of Los Angeles General Plan also includes 35 Community Plans that comprise the General Plan's Land Use Element. As discussed in Section IV.G, Land Use, of this Draft EIR, the Project Site is located within the Hollywood Community Plan Area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following general policy that is relevant to cultural resources:

- It is the City's policy that the Hollywood Community Plan incorporate the sites designated on the Cultural and Historic Monuments Element of the General Plan; furthermore, the Hollywood Plan encourages the addition of suitable sites thereto.

*(e) Los Angeles Cultural Heritage Ordinance*

The Los Angeles City Council adopted the Cultural Heritage Ordinance<sup>16</sup> in 1962 and amended it in 2018 (Ordinance No. 185472). The Ordinance created a Cultural Heritage Commission (Commission) and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The three criteria for HCM designation are stated below:

1. The proposed HCM is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state or community; or
2. The proposed HCM is associated with the lives of historic personages important to national, state or local history; or
3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

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

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

<sup>16</sup> *Los Angeles Administrative Code Section 22.171 of Article 1, Chapter 9, Division 22.*

(f) *Hollywood Redevelopment Project/Hollywood Redevelopment Plan*

The Project Site is also located within the Hollywood Redevelopment Project area. The Hollywood Redevelopment Project area was established in 1984 by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The Hollywood Redevelopment Project's goals include "the retention, restoration and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant historical and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria."<sup>17</sup> Policies and guidelines for the preservation, rehabilitation, and retention of historical properties are discussed in Section 511 of the Redevelopment Plan.<sup>18</sup> Policies and guidelines for the rehabilitation, conservation, and moving of structures are discussed in Sections 409.1 and 409.2 of the Redevelopment Plan.<sup>19</sup> As described therein, the rehabilitation of buildings determined by CRA/LA to be of architectural and/or historical significance shall be rehabilitated in accordance with the Secretary of the Interior's Standards. In addition, CRA/LA is authorized to move or to cause to be moved any standard structure or building that can be rehabilitated to a location within or outside the Project area.

Under authority granted in the redevelopment dissolution statutes, the Los Angeles City Council and Mayor approved a resolution and accompanying Ordinance No. 186,325 to transfer from the CRA/LA to the City of Los Angeles all responsibility for land use related plans and functions in the 19 remaining Redevelopment Project Areas. Thus, the City can take action regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and other applicable provisions of the Los Angeles Municipal Code.

## (2) Archaeological Resources

Federal, state, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Environmental Policy Act (NEPA), NHPA, and CEQA are the basic federal and state laws governing the preservation of historical and archaeological resources of national, regional, state, and local significance. As the Project would not require a federal permit and would not use federal money, federal archaeological regulations are not applicable to the Project.

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<sup>17</sup> *City of Los Angeles, Hollywood Redevelopment Plan, as first amended in May 2003 and effective July 2003, p. 3.*

<sup>18</sup> *City of Los Angeles, Hollywood Redevelopment Plan, as first amended in May 2003 and effective July 2003, pp. 34–36.*

(a) *California Environmental Quality Act*

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

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

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

In addition to archaeological resources that qualify as historical resources, CEQA requires consideration of project impacts to unique archaeological resources, defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or

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<sup>19</sup> *City of Los Angeles, Hollywood Redevelopment Plan, as first amended in May 2003 and effective July 2003, pp. 14–15.*

- Is directly associated with a scientifically recognized important prehistoric or historic event or person [PRC Section 21083.2(g)].

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

*(b) Los Angeles General Plan Conservation Element*

As previously described, the City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. As discussed above, Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historical and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>20</sup>

## **b. Existing Conditions**

### **(1) Historical Background**

The Project Site is located within the Hollywood community of the City of Los Angeles. Hollywood was originally part of Rancho La Brea and Rancho Los Feliz, and was developed beginning in the 1860s by several individuals, including Cornelius Cole, John T. Gower, Griffith J. Griffith, and Harvey Wilcox. The area, originally devoted to agriculture, developed quickly at the end of the twentieth century as increasing numbers of people moved to Southern California, and incorporated in 1903 as the City of Hollywood. Between 1903 and 1909, the population grew exponentially from 700 to 4,000 people, and the new city found it difficult to develop its infrastructure quickly enough to provide adequate city services to its residents. As a result, Hollywood was consolidated with the neighboring City of Los Angeles in 1910. By 1915, Hollywood was in the midst of a real estate boom, driven both by its proximity to downtown Los Angeles and the burgeoning film and tourism industries. As land values rose, and large estates gave way to smaller single-family and

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<sup>20</sup> *City of Los Angeles General Plan, September 2001, Conservation Element, pp. II-6 through II-9.*

multi-family residences, residential development that was previously concentrated along what is now Hollywood Boulevard spread to the north and south. During the same period, Hollywood Boulevard transitioned from being a residential street to an important commercial thoroughfare in the community. High-rise commercial buildings, theaters, and hotels were constructed in the community's commercial core during the period. For a more detailed discussion of Hollywood's history, refer to the Historical Report included as Appendix C of this Draft EIR.

## (2) Project Site Development

The Project Site is located in a highly urbanized area of Hollywood on the east side of Vine Street between De Longpre Avenue and Afton Place. The topography of the Project Site and immediate vicinity is relatively flat. Surrounding land uses include the ArcLight Cinemas to the northwest, multi-family residential uses to the east, hospital/medical uses to the northeast, commercial and single-family residential uses to the south, and the mixed-use On Vine development under construction to the west. Within the vicinity, major arterials, such as Sunset Boulevard and Vine Street, are generally developed with taller residential and commercial buildings, while lower mixed-use and residential buildings are located along the adjacent collector streets. The Project Site includes listed and potential historical resources, as described below. Listed resources are defined as those designated under national, state, or local landmark or historic district programs. Potential resources are defined as properties over 45 years of age. The 45-year criterion recognizes that there may be as much as a 5-year lag between the identification of historical resources and the date planning decisions are made.<sup>21</sup>

### c. Historical Resources

The Study Area identified in the Historical Report (Appendix C of this Draft EIR) includes the Project Site as well as all parcels within a 500-foot radius from the center of the Project Site. Parcels beyond this Study Area were not included because the Project would have no potential to directly or indirectly impact the historical resources on these distant parcels or their surrounding setting. The buildings and streets immediately surrounding the Project Site create a geographic and visual separation between the parcels beyond the Study Area and the Project Site. The Project Site therefore cannot be reasonably considered part of the environmental setting of historical resources beyond the Study Area due to this intervening space.

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<sup>21</sup> State Office of Historic Preservation, "Instructions for Recording Historical Resources," March 1995, p. 2.

## (1) Historical Resources within the Study Area

The Historical Report defines the Study Area as the Project Site and all parcels within a 500-foot radius from the center of the Project Site.

There is one designated historical resource and one previously surveyed historical resource within the Study Area. The designated historical resource, the Afton Square Historic District, has the potential to be directly and indirectly impacted by the proposed Project. It is listed in the California Register and was not re-evaluated in the 2010 or 2020 surveys of Hollywood conducted by the CRA/LA (Hollywood CRA Surveys). However, since 6241 Afton Place, which was previously determined to be non-contributing to the Afton Square Historic District, would be demolished as part of the Project, it was re-evaluated individually in the Historical Report.

The previously surveyed historical resource, 1313 Vine Street, is located across Vine Street and to the south of the Project Site. It was identified as eligible for national, state, and/or local landmark designation through the 2010 and 2020 Hollywood CRA Surveys. It was not re-evaluated in the Historical Report because there is no potential for direct impacts on this property from the Project. In order to provide a conservative analysis of the Project's potential for indirect impacts, the Historical Report accepted the recent findings regarding the eligibility of the property.

There is one property within the Study Area and on the Project Site that was previously surveyed as eligible for state and/or local landmark designation in the 2010 and 2020 Hollywood CRA Surveys and has the potential to be directly impacted by the Project: 1330 Vine Street. The previous surveys provided different reasons for the building's apparent significance. Because demolition of the building is proposed and the previous evaluations are inconsistent, 1330 Vine Street is evaluated in detail below, rather than accepted as an eligible historical resource.

### *(a) Afton Square Historic District*

The following is a summary of the survey history, description, and eligibility status of the Afton Square Historic District (Historic District). A detailed discussion of the Historic District is provided in the Historical Report, included as Appendix C of this Draft EIR. A 1995 survey of Hollywood found the Historic District significant as one of the few remaining intact residential neighborhoods in Hollywood and formally determined it eligible for listing on the National Register. Thus, the Historic District is automatically listed in the California Register. The period of significance for the Historic District was established as 1916 to 1939. In 1919, the Historic District included a string of one-story bungalows along the north side of De Longpre Avenue, west of El Centro and a cluster of two-story apartment buildings along De Longpre Avenue, east of El Centro. By the late 1930s the area was

built out with a mix of single and multi-family residences in Arts and Crafts and Period Revival styles. Multi-family property types included one-story bungalow courts, two-story duplexes and fourplexes, and four-story apartment buildings.

When the Historic District was determined eligible for listing in the National Register in 1995, there were 51 contributing and 12 non-contributing properties identified, for a total of 63 properties. During the 2000s, the single-family residence at 6263 De Longpre Avenue was demolished and replaced with a surface parking lot, and the multi-family residence at 6109 Afton Place was demolished to construct the Resolve Recovery Center. These demolitions represent the loss of two contributing properties, reducing the total number of contributing properties to 49. Nevertheless, the Historic District continued to be evaluated as eligible in the 2003 and 2010 Hollywood CRA Surveys. The 2010 survey also noted negative alterations to a few contributing properties; however, these properties remained contributing to the Historic District.

The seven lots within the Project Site located within the Historic District are briefly described below and shown in Figure IV.B-1 on page IV.B-17. Detailed descriptions of each property are provided in the Historical Report included as Appendix C of this Draft EIR.

*(i) 6241 Afton Place*

This property is occupied by a two-story apartment building constructed in 1959. It is non-contributing to the Historic District because it post-dates the period of significance and identified as such on the 1994 inventory form. However, this property was evaluated individually in the Historical Report because it is proposed for demolition as part of the proposed Project. A summary of the evaluation is provided in Subsection 2.c.(2)(b)(ii) below.

*(ii) 6245 Afton Place*

This property is occupied by a one-story single-family Colonial Revival style bungalow constructed in 1919 that is now used as an office. The bungalow is contributing to the Historic District. It is substantially intact and was constructed during the period of significance.

*(iii) 6249 Afton Place*

This property is occupied by a one-story single-family residence at the front of the lot and a two-story duplex at the rear. The Colonial Revival style bungalow at the front of the lot was constructed in 1919 and is now used as an office. The bungalow is contributing to



- Project Site
- Historic District
- Buildings to be Demolished
- Buildings to be Relocated



Base Map Courtesy of LA County Assessor

**Figure IV.B-1**  
Potential and Identified Historical Resources  
Within and Adjacent to the Project Site

the Historic District. It is substantially intact and was constructed during the period of significance.

The building at the rear of the lot was constructed in 1939 as a duplex, but is now used as an office. Although the building was constructed within the period of significance for the Historic District, the building appears to lack integrity. The building has no particular style and has been significantly altered. Therefore, the building is non-contributing to the Historic District. Furthermore, it is identified as non-contributing on the 1994 inventory form map.

*(iv) 6255 Afton Place*

This property is occupied by a one-story single-family Colonial Revival style bungalow constructed in 1920 that is now used as an office. The bungalow is contributing to the Historic District. Although it has been altered, it is substantially intact and was constructed during the period of significance.

*(v) 6254 De Longpre Avenue*

This property is occupied by a one-story single-family residence at the front of the lot and a one-story building at the rear that appears to be a garage or storage shed. The residence is a Colonial Revival style bungalow constructed in 1919. The bungalow is contributing to the Historic District. It was constructed during the period of significance and retains sufficient integrity despite its poor condition.

The date of construction for the building at the rear of the lot is unknown; however, it does not appear to be the original garage. The building was constructed after 1939 and is non-contributing to the Historic District. It is not identified on the 1994 inventory form map.

*(vi) 6256 De Longpre Avenue*

This property is occupied by a one-story single-family residence at the front of the lot and a two-story building at the rear. The residence is a Colonial Revival style bungalow constructed in 1919. The bungalow is contributing to the Historic District. It was constructed during the period of significance and retains sufficient integrity despite its poor condition.

At the rear of the lot is a vacant two-story building that had a garage and storage space on the first floor and a dwelling unit on the second floor. The building was constructed in 1956, after the period of significance (1939). Therefore, it is non-contributing to the Historic District. Furthermore, it is identified as non-contributing on the 1994 inventory form map.

*(vii) 6262 De Longpre Avenue*

This property is occupied by a one-story single-family residence at the front of the lot and a two-story building at the rear. The residence is a Spanish Colonial Revival style bungalow constructed in 1920. The residence is contributing to the Historic District. It was constructed during the period of significance and retains sufficient integrity despite its poor condition.

At the rear of lot is a vacant two-story building that had a garage and storage space on the first floor and a dwelling unit on the second floor. The building was constructed in 1941, after the period of significance (1939). Therefore, it is non-contributing to the Historic District. Furthermore, it is identified as non-contributing on the 1994 inventory form map.

*(b) 1313 Vine Street*

Historically known as the Don Lee Mutual Broadcast Building, 1313 Vine Street is located southwest of the Project Site. This three-story television broadcast facility was designed in the Late Moderne style by the architect Claud Beelman and constructed in 1948. It was identified in the 2010 and 2020 Surveys as eligible for listing in the National Register, California Register, and for local designation as an excellent example of Late Moderne industrial architecture in Hollywood as well as of the work of Beelman, a noted architect. Additionally, it is eligible as the oldest extant studio building in Hollywood designed specifically for television. In 2002, the building was rehabilitated and adaptively reused as the Pickford Center for Motion Picture Study

## (2) Properties Identified and Evaluated as Potential Historical Resources on the Project Site

6272 De Longpre Avenue, 6241 Afton Place, and 1330 and 1348 Vine Street were identified as potential historical resources for the purposes of the Historical Report. These properties are all over 45 years of age and proposed for demolition. 1330 Vine Street was previously evaluated as appearing eligible for listing in the California Register (Status Code 3CS) in the 2010 Hollywood CRA Survey and as a HCM in the 2020 Hollywood CRA Survey (Status Codes 3CS/5S3), but each survey provided different reasons for the building's apparent significance. Because the previous surveys were inconsistent, the building warranted a more detailed, intensive evaluation to accurately analyze Project impacts. 6241 Afton Place is a non-contributor to the Afton Square Historic District; however, it was not evaluated individually as a potential historical resource in the 2010 or 2020 Hollywood CRA Surveys. Likewise, 6272 De Longpre and 1348 Vine Street were not evaluated in either survey. A brief description and summary of the eligibility status of all properties are provided below. All of the eligibility evaluations applied the contexts, themes, and property types from the Los Angeles Citywide Historic Context Statement

(LACHCS). Property photos and detailed eligibility evaluations of the properties are provided in the Historical Report, included as Appendix C of this Draft EIR.

*(a) 6272 De Longpre Avenue*

*(i) History and Description of Property*

The building at 6272 De Longpre Avenue was originally constructed in 1920 as a single-family residence. The building remained a single-family residence until 1954 when office uses were added. In 1956, the building was significantly altered to resemble its current massing with the construction of a stucco-clad office addition on the front (north) elevation along De Longpre Avenue. It is likely at this time that the original residential portion of the building was also clad in stucco. By 1972, the building was fully utilized as medical offices and was further altered with the addition of brick veneer on its front elevation. The building was occupied by medical offices until at least 1996 when its use changed to a video recording and editing studio. Today, the building at 6272 De Longpre Avenue is fully clad in textured stucco and the windows have all been infilled and resized. The main entrance of the rectangular office addition that once fronted De Longpre Avenue was also infilled circa 2007. The only remnant of the original building form as a single-family residence, visible from the exterior, is the multi-gabled roof on the east elevation.

*(ii) Evaluation of Eligibility*

The building at 6272 De Longpre Avenue is so profoundly altered that it does not reflect its appearance as a single-family residential property. It lacks all aspects of integrity except location as a result of substantial alterations. Therefore, the building at 6272 De Longpre Avenue is not eligible for listing in the National Register, the California Register or as a HCM.

*(b) 6241 Afton Place*

*(i) History and Description of Property*

The two-story apartment building at 6241 Afton Place was constructed in 1959 by owner/contractor Atlas Development Co. and housed numerous tenants over time. The building includes eight dwelling units and eight recessed carport spaces. The building at 6241 Afton Place is situated on the north side of Afton Place, between Vine Street at the west and El Centro Avenue at the east. The building is designed in the Dingbat style and has a wood frame structure mostly sheathed in stucco and a long rectangular plan covered by a flat roof with a flat parapet. The primary elevation faces south onto Afton Place and is asymmetrically organized. At the west end, a decorative lantern is affixed to the stucco-clad second story and two carport spaces are recessed into the first story. At the east end, there is an applied wood batten frame surrounding a group of three flush-mounted windows

on the second story and an area of flagstone veneer on the first story. The windows on the primary elevation are altered with plywood infill, vinyl replacements, and metal security bars. The side and rear elevations are characterized by flat, stucco-clad surfaces and flush mounted windows. Three balconies on the east elevation project over the side driveway and are enclosed by a combination of low stucco wall and zigzag metal railing. The shallow front yard is planted with a grass lawn and two palm trees. A short concrete driveway leads from the street to the two carport spaces at the front elevation. A second, longer concrete driveway runs along the east (side) elevation, providing access to additional carport spaces recessed into the first story at the north (rear) elevation. The rear yard and the narrow west (side) yard are also paved with concrete.

*(ii) Evaluation of Eligibility*

The building at 6241 Afton Place is a non-contributor to the Afton Square Historic District and it was not found to be individually eligible as a potential historical resource in the 2010 or 2020 Hollywood CRA Surveys. The building was evaluated for significance under Criterion A for its association with the Stucco Box/Dingbat Sub-Theme (of the Multi-Family Residential Development Theme). While the building is a standard example of the property type, it does not possess a strong sense of identity expressed through a collection of inexpensive flourishes (e.g., applied decoration, thematic design motifs, exotic landscape, a building name displayed in prominent and decorative script on the façade) that would make it an excellent example of the stucco box/dingbat building. Furthermore, the building is not considered a clearly important example within that historic pattern of events, and research did not indicate that the property was the location of an important individual event in history. Therefore, the property does not appear to be significant under Criterion A.

The building at 6241 Afton Place was evaluated for significance under Criterion B; however, research did not indicate that the property was associated with an individual whose specific contributions to history are demonstrably important. Therefore, the property does not appear to be significant under Criterion B.

Properties may be eligible under Criterion C if they embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or lastly, represent a significant and distinguishable entity whose components may lack individual distinction. The building at 6241 Afton Place was evaluated for significance under Criterion C in the area of Architecture within the Stucco Box/Dingbat Sub-theme. The building exhibits the stucco box/dingbat typology but is a basic example of the ubiquitous type and style. The building was constructed using common wood frame construction techniques from its time period and does not embody the distinctive characteristics of its type, period, or method of construction. Furthermore, there is not enough scholarly information on the body of work of any of the individuals

associated with the building to conclude that they should be considered a master engineer or designer. Since the building consists of common materials and ordinary craftsmanship, the building also does not possess high artistic value. Finally, while the building is located within the boundaries of the Afton Square Historic District, it is a non-contributing building that post-dates the period of significance for the Historic District (1916–1939). For these reasons, the building at 6241 Afton Place does not appear to be significant under Criterion C.

Criterion D was not considered in the Historical Report, as it generally applies to archaeological resources. Refer to the analysis below with regard to potential impacts to archaeological resources.

*(iii) Conclusion*

The building at 6241 Afton Place is not significant under any of the National Register criteria. Therefore, it does not appear to be eligible for listing in the National Register. In addition, since the California Register and HCM criteria mirror those of the National Register, the building is not significant for the same reasons addressed in the evaluation of significance above. As such, it does not appear to be eligible for listing in the California Register or as a HCM.

*(c) 1330 Vine Street*

*(i) History and Description of Property*

The building at 1330 Vine Street was constructed in 1930 for owner Jess Willard by architect Arthur I. Rouda and originally housed a market known as Willard's Food Department Store. Jess Willard was famous for winning the heavyweight boxing champion of the world in 1915 and maintained his champion status for four years until 1919. After retirement, Willard settled in Los Angeles opened Willard's Food Department Store. However, building became bank-owned by 1933 and was known as Fredericks Market by 1932. By 1944, it was known as Radio Center Market because of its close proximity to both the CBS and NBC radio studios. The building remained a neighborhood market until 1955, when Jerry Fairbanks purchased the building and converted it from a market to a corporate film production studio and constructed a 4,500-square-foot addition. The conversion and addition were designed by A. Godfrey Bailey. Fairbanks was a significant person within the television industry in the late 1940s who produced of a number of new short format series, including one in collaboration with the editors of *Popular Science* magazine that would run until 1949. Fairbanks also appears to have been a significant innovator in the television industry with his Multicam system and Zoomar lens, which impacted the production of television shows in major and lasting ways. The building has remained in use as a film production facility by a variety of subsequent companies to the present day.

The building at 1330 Vine Street occupies the northeast corner of the intersection of Vine Street and Afton Place and its primary elevation faces west onto Vine Street. The west elevation historically featured a 42-foot-tall tower at the center and shorter towers at each end. It exhibited a full array of intricate Art Deco details along the second story, including rows of zigzags, chevrons, waves, and rosettes, and layers of vertical piers, angled projections, and stepped parapets. The first story consisted almost entirely of large storefront windows, which were topped with cloth awnings at first and later by a continuous, flat, aluminum awning. The second story featured a tall window in the center, large signage panels, blade signs, and in the Radio Center Market days, a neon billboard hung from the tall central tower. Of these original features on the west elevation, only remnants of the Art Deco façade patterns and the flat sign panels between the former towers remain. The 1955 conversion of the market to a film production studio also infilled the storefront openings on Vine Street, removed the aluminum awning, and added window openings. The Art Deco details and three towers, however, remained. The two smaller towers appear to have been removed and the parapet flattened by 1963. In 1984, additional openings were infilled. Other minor alterations, signage changes, interior remodels, and mechanical, electrical, and plumbing work have also been performed on the building. Today, the building's primary west elevation has very few openings and include a single metal pedestrian door with a wired glass light, a pair of large metal loading doors, and four fixed wood windows. The pedestrian door is topped with an awning. None of these features are original.

*(ii) Evaluation of Eligibility*

The building at 1330 Vine Street was evaluated in the 2010 and 2020 Hollywood CRA Surveys. The 2010 evaluation concluded that the building appeared eligible for listing in the California Register as a significant example of a neighborhood market, while the 2020 evaluation concluded that it appeared eligible as a significant example of an industrial property associated with the entertainment industry. As the evaluations came to different conclusions regarding the reason for apparent significance, the building required a more detailed evaluation to determine if it should be considered a historical resource for the purposes of CEQA. The building at 1330 Vine Street is evaluated under each criterion for the national, state and local registers.

Based on the detailed evaluation provided in the Historical Report, the building could be significant under Criterion A for its association with Markets Sub-Theme (of the Neighborhood Commercial Development Theme) as a neighborhood market but lacks sufficient integrity as a result of substantial alterations that have occurred since 1955. The building no longer retains integrity of design and feeling, which are the two most important aspects of integrity for this property type. In addition, the building lacks the integrity of association since it has been converted to a film production studio. Furthermore, the building's materials and workmanship have been impacted by the removal of numerous

architectural features. Thus, the only aspects of integrity remaining from the period in which the building functioned as a neighborhood market are setting and location, which are not sufficient for the building to be considered eligible under Criterion A within the Markets Sub-Theme.

The building was also evaluated for significance under Criterion A for its association with the Motion Picture Industry—Independent Studios and Rental Plants Sub-Theme (of the Industrial Properties Associated with the Entertainment Industry Theme) as an independent production studio from the period 1955 to 1973, when it was occupied by Jerry Fairbanks Productions. As detailed in the Historic Report, the building no longer retains integrity based on design, feeling, or association, which are listed in the LACHCS as the three most important aspects of integrity for this property type. Subsequent alterations that occurred since the 1970s, which included the removal of the building's elaborate Art Deco facades, have impacted its integrity of design and feeling from the period of which it was occupied by Jerry Fairbanks Productions. In addition, although the building was the home of the independent film production company Jerry Fairbanks Productions for at least 15 years, there is also no evidence to suggest that it was directly associated with any important events, developments, or trends. Therefore, the building is not significant under Criterion A.

The building at 1330 Vine Street was evaluated for significance under Criterion B for its association with Jess Willard and Jerry Fairbanks. Based on the detailed evaluation provided in the Historical Report, the building does not appear to be significant under Criterion B for its association with Jess Willard because Willard's association with the building was brief, lasting less than three years. In addition, although Willard was a famous sports figure in his younger years, there is no evidence to suggest that Willard was a significant person after retiring and opening Willard's Food Department Store. The building also does not appear to be significant under Criterion B for its association with Jerry Fairbanks because the association of the building with Fairbanks post-dates the period in which he achieved significance and does not represent his important contributions to the television industry from the late 1940s. As detailed in the Historical Report, Fairbanks's workplace was located elsewhere (at 6052 Sunset Boulevard) when he made his significant accomplishments as documented in newspaper ads, Los Angeles City Directories, and newspaper articles from the time period. As further explained in *National Register Bulletin No. 15*, "Properties eligible under Criterion B are usually those associated with a person's productive life, reflecting the time period when he or she achieved significance... Properties that pre- or post-date an individual's significant accomplishments are usually not eligible." Therefore, the building at 1330 Vine Street does not appear to be significant under Criterion B for its association with Willard or Fairbanks.

Properties may be eligible under Criterion C if they embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master;

possess high artistic values; or, lastly, represent a significant and distinguishable entity whose components may lack individual distinction. The building at 1330 Vine Street was designed by architect Arthur I. Rouda in the Art Deco style in 1930 for use as a market. In its current form the building does not embody the distinctive characteristics of either the Art Deco style or the public market typology due to the extensive alterations that have removed the majority of its character-defining features. In addition, the building was constructed using common masonry and concrete techniques from its time period. As a result, it does not embody the distinctive characteristics of its type, period, or method of construction. Based on the detailed evaluated in the Historical Report, the building also does not represent the work of Arthur I. Rouda or A. Godfrey Bailey due to the extensive alterations that have occurred on the building. In addition, Rouda and Bailey are not considered master architects. Furthermore, although the building possesses remnants of cast Art Deco details and façade patterns, but in their current altered state they no longer exhibit high artistic value. The majority of building consists of common materials and ordinary craftsmanship. As such, the building does not possess high artistic value. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the building at 1330 Vine Street is not part of a historic district and is being evaluated as an individual building, this aspect of Criterion C does not apply. Therefore, the building at 1330 Vine Street does not appear to be significant under Criterion C.

Criterion D was not considered in the Historical Report, as it generally applies to archaeological resources. Refer to the analysis below with regard to potential impacts to archaeological resources.

### *(iii) Conclusion*

While the building may have been considered significant under Criterion A as a neighborhood public market from 1930 to 1955, the building has been so substantially altered that it no longer retains the physical integrity necessary to convey any potential significance. In addition, the building does not appear to have any potential significance from the period 1955 to 1973 when it was used as Jerry Fairbanks Productions independent film studio, nor does it retain integrity from this period. Therefore, 1330 Vine Street does not appear to be eligible for listing in the National Register. Since the California Register and HCM criteria mirror those of the National Register, the building may have been considered significant under Criteria 1 for the same reasons and periods outlined above if it were not so substantially altered. As the building no longer reflects its 1930 to 1955 appearance, it does not appear to be eligible for listing in the California Register in the context of commercial development or architecture. Additionally, the building no longer reflects its 1955 to 1973 appearance when it functioned as a film production studio as a result of subsequent alterations, specifically in 1984. It is possible for a building to be ineligible for listing in the National Register, but still eligible for listing in

the California Register. However, this would only occur if the building “maintained the potential to yield significant scientific or historical information or specific data.”<sup>22</sup> Because the building at 1330 Vine Street has been so substantially altered, there is no potential to yield scientific or historical information or specific data with regard to its use as Willard’s Food Department Store, Fredericks Market, Radio Center Market, or Jerry Fairbanks Productions.

*(d) 1348 Vine Street*

*(i) History and Description of Property*

The building at 1348 Vine Street was constructed in phases and includes storefronts with the addresses 1348, 1350, 1352, 1354, 1356, 1358 and 1360. It was originally constructed in 1924 by owner H.R. Weisz without an architect as a one-room, 20-foot by 40-foot brick real estate office building. H.R. Weisz was one of the two brothers of Weisz Brothers Real Estate who owned the building from 1924 to at least 1934. The real estate firm operated out of the storefront at 1348 Vine Street until at least 1930 before moving to another storefront at 1356 Vine Street in 1934.

In 1931, H.R. Weisz acquired and incorporated the adjacent gas station and auto repair shop at 1350 Vine Street into the existing building and converted this portion of the building into a vegetable market. The original garage gates were replaced with folding doors in 1931 but replaced with a storefront in 1935. In 1936, a 15-foot by 20-foot storeroom addition was constructed at 1352 Vine Street when the existing store was converted into a café.

After the adjacent properties were incorporated into the building in 1931 and 1934, frequent tenant turnover was common. Tenants in the early 1930s included Louis Brott’s clothing cleaners, Louis Freid meat purveyor, Golden Bear Café, and Clay McConnell Radios. By the mid-1930s, the building was acquired by E.H. Rose and tenants remained consistent.

In 1941, under the ownership of E.H. Rose and as designed by architect Lyle Nelson Barcume, the northernmost portion of the building at 1360 Vine Street was the last to be constructed. This portion was first constructed as a public market before becoming the home of Billy Berg’s legendary nightclub around 1945 to 1949. In 1945 or 1946, the portion of the building at 1356 Vine Street was converted into a nightclub with a new façade. The plate glass windows were removed and replaced with new glass brick, and a front parapet wall was raised to 8 feet. By the 1950s, the building reflected the continuous commercial

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<sup>22</sup> CCR Section 4852 (c).

building that exists today. Through the 1950s and 1960s, alterations and additions consisted mostly of interior alterations along with the addition and alterations of various signage and awnings on the exterior as tenants and uses changed.

Building tenants in the 1940s also included Harry's of Hollywood Liquors, Allen Bercovitz Cleaners, and a restaurant. Tenants in the late 1950s and 1960s included a self-serve laundromat, Whistle Stop Café, Knickerbocker Tailors & Cleaners, Radio City Time Shop jewelry store, Spectrographic Studio Inc., Fidelity Recording Studio, a printing services store, and Tivoli Restaurant. The type of commercial uses has since remained consistent as service-oriented retail shops and restaurants. Tenants in the 1980s included Gasbarri Anthony of Rome, Eldorado Hairstyling for Men, Jo Jo's Market, Abraham's Shoe Repair, and Spirits of the World. Today, Jo Jo's Market remains at 1356 Vine Street, along with an insurance office at 1348, Hollywood Pawnbrokers Pawn Shop at 1354, Chavela Restaurant at 1358, and Los Balcones restaurant at 1360. What was Billy Berg's Club appears to now be divided between Jo Jo's Market and Chavela Restaurant.

The building at 1348 Vine Street occupies the southeast corner of the intersection of Vine Street and De Longpre Avenue and its primary elevation faces west onto Vine Street. The commercial building at 1330 Vine Street is located immediately to the south. The commercial building at 6272 De Longpre Avenue is located immediately to the east. The building at 1348 Vine Street is rectangular in plan with a long low massing and flat roof. The building is divided into five individual commercial tenant spaces of varying sizes, wall materials, storefront windows, entryway locations, and parapet profiles.

#### *(ii) Evaluation of Eligibility*

Based on the detailed evaluation provided in the Historical Report, the building at 1348 Vine Street could be significant under Criterion A for its association with the Commercial Identity Theme but none of the businesses that occupied the building meet the eligibility standards in the LACHCS. With the exception of Billy Berg's Club, which is evaluated under the Entertainment Industry Sub-Theme below, none of the businesses were important fixtures in the community. The Weisz Brothers Real Estate Company had no significant associations with the commercial growth and development in Los Angeles, nor was it a long-term business in the community. Therefore, the building is not significant under Criterion A within the Commercial Identity Theme.

To be significant under Criterion A within the Social Scene Associated with the Entertainment Industry Sub-Theme, the building at 1348 Vine Street would have to have been an entertainment or social venue with a significant relationship to the entertainment industry during the 1920 to 1960 period of significance. As detailed in the Historical Report, in terms of broad patterns of history, the building at 1348 Vine Street is most significant for its association with Billy Berg's Hollywood nightclub. Often cited as the

birthplace of modern jazz in Los Angeles, Billy Berg's Club hosted some of the most prominent jazz musicians in the country and is noted by many musicians as the place where they "got their big break." Of particular note in the history of jazz in Los Angeles was the engagement of the Dizzy Gillespie Quintet at Billy Berg's Club from December of 1945 to February of 1946. Other influential musicians who played at Billy Berg's were George "Red" Callender, Jimmy Blanton, Billie Holiday, Glen Miller, Benny Goodman, Bulee "Slim" Gaillard, Harry "The Hipster" Gibson, Coleman Hawkins, Charles Brown, and Frankie Laine. While Billy Berg had at least four other clubs before and after Billy Berg's Club, research shows that Billy Berg's Club was the most highly regarded and distinct in that it provided the opportunity for socialization across racial boundaries. Although the property is significant under Criterion A, the building no longer retains integrity of design, feeling, materials or association from when it was occupied by Billy Berg's Club. Design, feeling, and association are listed in the LACHCS as the three most important aspects of integrity for this property type. Due to substantial alterations that have occurred since 1949, the only aspects of integrity remaining from the period of 1945 to 1949 when the building functioned as a nightclub are setting and location. There are no physical reminders or remnants of Billy Berg's Club existence, and the building is now occupied by Jo Jo's Market and Chavela Restaurant. The aspects of setting and location are not sufficient for the building to be considered eligible under Criterion A .

To be eligible for listing in the National Register under Criterion B, a property must be associated with the lives of persons significant in our past. As detailed in the Historical Report, Billy Berg was determined to be significant in the context of jazz music in Los Angeles, and the building at 1348 Vine Street is significant for its association with Billy Berg, a supporter of bebop and racial integration. Therefore, the building at 1348 Vine Street is significant under Criterion B; however, as discussed above, due to substantial alterations, there are no physical reminders of its association with Billy Berg. Thus, the building it lacks sufficient integrity to be eligible under Criterion B.

Properties may be eligible under Criterion C if they embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or, lastly, represent a significant and distinguishable entity whose components may lack individual distinction. However, based on the detailed evaluation provided in the Historical Report, the building is not significant under Criterion C as it was constructed in phases and has been altered in the past such that the building does not reflect a particular period. The building was also not designed by a notable architect and is a typical unreinforced masonry building without an aesthetic ideal or design concept.

Criterion D was not considered in the Historical Report, as it generally applies to archaeological resources. Refer to the analysis below with regard to potential impacts to archaeological resources.

*(iii) Conclusion*

While the building may be considered significant under Criteria A and B for the association with Billy Berg's Club and Billy Berg, it has been so substantially altered that it no longer retains the physical integrity necessary to convey any potential significance. Therefore, the building at 1348 Vine Street does not appear to be eligible for listing in the National Register. In addition, as the California Register and HCM criteria mirror those of the National Register, the building may have been considered significant under Criteria 1 and 2 for the same reasons and periods outlined above if it were not so substantially altered. As the building at 1348 Vine Street no longer reflects its 1945–1949 appearance, it does not appear to be eligible for listing in the California Register or as an HCM..

## d. Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. The area surrounding the Project Site is a highly urbanized area and has been subject to disruption throughout the years. On May 23, 2017, a cultural resources records search was conducted through the South Central Coastal Information Center (SCCIC), included as Appendix D of this Draft EIR. The results of the record search indicate that a total of 42 cultural resource reports and studies have been conducted within a 0.5-mile radius of the Project Site, none of which included the Project Site.<sup>23</sup> The records search determined that there are no archaeological resources located within the Project Site and one archaeological resource within a 0.5-mile radius of the Project Site. Although the Project Site has been previously developed and graded, it has not been previously surveyed for the presence of archaeological resources. In addition, the existing development on the Project Site does not allow for an adequate surface survey. Thus, there is potential for an archaeological site to be identified during construction activities associated with the Project.

## 3. Project Impacts

### a. Thresholds of Significance

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

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

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<sup>23</sup> A 0.5-mile radius is considered industry standard for a records search.

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

**Threshold (c): Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, Section 5097.98, and Health and Safety Code Section 7050.5(b)).**

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

### (1) Historical Resources

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

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

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.<sup>24</sup> A substantial adverse change in the significance of an historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.<sup>25</sup>

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<sup>24</sup> CEQA Guidelines, Section 15064.5(b).

<sup>25</sup> CEQA Guidelines, Section 15064.5(b)(1).

## (2) Archaeological Resources

If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100-years-old<sup>26</sup> and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

### b. Methodology

As noted above, the Historical Report (Appendix C of this Draft EIR) is based, in part, on a field inspection of the study area, which included the Project Site, as well as all parcels within a 500-foot radius from the center of the Project Site (Study Area). The Study Area was established to account for potential impacts on historical resources in the vicinity. Parcels beyond this Study Area were not included because the Project would have no potential to directly or indirectly impact the buildings on these distant parcels or their surrounding setting. The buildings and streets immediately surrounding the Project Site create a geographic and visual separation between the parcels beyond the Study Area and the Project Site. The Project Site therefore cannot be reasonably considered part of the environmental setting of historical resources beyond the Study Area due to this intervening space.

The Historical Report is also based on historical building permits for the Project Site, Sanborn Fire Insurance maps, historical photographs, aerial photos, and site plans, as well as review of the National Register and its annual updates, the California Register, and the City of Los Angeles' inventory of historical properties to identify any previously recorded

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<sup>26</sup> Although the CEQA criteria state that "important archaeological resources" are those which are at least 100- years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.

properties within or near the Project Site. In addition, the findings for the 2010 and 2020 Hollywood CRA Surveys were consulted, and an intensive pedestrian survey was also undertaken to document the existing conditions of the Project Site and the surrounding vicinity. Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources, and if so; (2) a determination of whether the Project would result in a “substantial adverse change” in the significance of the resource or resources.

To address potential impacts associated with archaeological resources, a formal records search was conducted by the SCCIC to assess the archaeological sensitivity of the Project Site and vicinity (Appendix D of this Draft EIR). In addition, an evaluation of existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources.

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

The following project design features are applicable to the Project.

**Project Design Feature CUL-PDF-1:** A Preservation Plan will be prepared documenting the relocation and rehabilitation of the six bungalows in accordance with the Secretary of Interior’s Standards for Rehabilitation. Specifically, the Preservation Plan will document through a combination of photographs and drawings those features such as concrete porches and brick chimneys that will be demolished and reconstructed after the bungalows are returned to the Project Site. The Preservation Plan will include guidelines for disassembling the bungalows (in the event they cannot be moved intact) and protecting them from vandalism while they are being stored off the Project Site. Interim protection measures may also include weatherproofing and treating active insect infestation. The Preservation Plan will address the possibility that the bungalows could be repurposed for restaurant uses or as residential units. In addition, the Preservation Plan will address a construction monitoring program to ensure all of the aforementioned are carried out in accordance with the Secretary of the Interior’s Standards for Rehabilitation. The Applicant will be required to retain a professional meeting the Secretary of the Interior’s Professional Qualifications Standards for historic architecture with five years of demonstrated experience in rehabilitation planning, design and construction of the Project as it relates to the bungalows. Construction monitoring will include a meeting with the contractor prior to the relocation of the bungalows to discuss minimizing collateral damage, and at regular intervals during construction, including but not

be necessarily limited to 50 percent, 90 percent, and 100 percent construction. Memoranda will be prepared to summarize findings, make recommendations as necessary, and document construction with digital photographs as necessary but not necessarily limited to 50 percent, 90 percent, and 100 percent construction. The memoranda will be submitted to the Office of Historic Resources for concurrence.

**Project Design Feature CUL-PDF-2:** As one of the storefronts of the 1356 Vine Street building was once the home of Billy Berg’s legendary jazz nightclub, an interpretive program will be prepared to increase general public and patron appreciation for the important role the nightclub played in the history of jazz.

#### **d. Relevant Project Characteristics**

The Project proposes to develop a mixed-use building on an 81,050-square-foot site located within the Hollywood Community of the City of Los Angeles (the Project). The new mixed-use building would be constructed within the western portion of the Project Site, fronting Vine Street, Afton Place, and De Longpre Avenue. In addition, six bungalows within the eastern portion of the Project Site that are part of the Afton Square Historic District would be relocated within the Project Site and adapted for reuse pursuant to a Preservation Plan. The Project includes two options herein referred to as “Residential Option” and “Office Option.”

The Residential Option would develop up to 429 new residential units, including 36 units designated for Very Low Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or 12 residential units, in which case the development would still propose a total of 429 residential units. The new building would be 360 feet 4 inches in height when accounting for rooftop mechanical equipment. The estimated depths of excavation expected for the subterranean parking and building foundation would be up to approximately 40 feet below grade. Overall, the Residential Option would provide approximately 484,421 square feet of floor area within the Project Site.

Under the Residential Option, the new 32-story high-rise building would feature a rectangular podium comprised of Levels 1 through 9, which would contain neighborhood-serving commercial retail uses, grocery store or office uses, as well as residential units. A residential tower would be situated on top of the northwestern portion of the podium. As such, the height of the new building would transition from De Longpre Avenue on the north to Afton Place on the south. Along the eastern elevation, the podium would be terraced at Level 3 to further reduce the scale of the building where it meets the bungalows and other residential uses. Additionally, the new building would be separated from the bungalows by

an approximately 22- to 57-foot publicly accessible buffer that would include a pedestrian walkway and open space. This buffer would provide access to the bungalows and the ground floor of the new building, as well as access between De Longpre Avenue and Afton Place.

The Office Option would develop approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses in the new building, as well as 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units. The new building would be 303 feet in height when accounting for rooftop mechanical equipment. The estimated depth of excavation expected for the subterranean parking and building foundation would be up to approximately 83 feet below grade. Upon completion, the Office Option would provide approximately 484,423 square feet of floor area within the Project Site.

Under the Office Option, the new 17-story high-rise building would feature a main entrance fronting Vine Street and ground level restaurant uses facing Vine Street and Afton Place. The upper levels would include offices and associated uses with a roof garden at the penthouse level. Additionally, a terrace with landscaping and seating proposed at the ground level along Afton Place would enhance the livability of the surrounding neighborhood. The Office Option would include a private buffer to separate the new high-rise building in the western portion of the Project Site and the relocated bungalows within the eastern portion of the Project Site.

The six historic bungalows within the Project Site would be temporarily removed from the Project Site during grading and construction activities. Pursuant to Project Design Feature CUL-PDF-1 detailed above, the bungalows would be returned to the eastern portion of the Project Site and rehabilitated in accordance with a Preservation Plan to ensure they would retain their significance as contributors to the Historic District.

As shown in Figure IV.B-1 on page IV.B-17, in order to accommodate the Project, the existing commercial buildings at 6272 De Longpre Avenue, 1330 Vine Street, 1348 Vine Street, and the eight-unit multi-family at 6241 Afton Place would be removed. However, as discussed above, none of these buildings are historical resources for purposes of CEQA. 6272 De Longpre Avenue, and 1330 and 1348 Vine Street are outside the boundary of the Historic District and are not historical resources based on the evaluation in the Historical Report. In addition, the building at 6241 Afton Place is a non-contributor to the Historic District and is not individually considered a historical resource based on the evaluation in the Historical Report. The ancillary buildings adjacent to the bungalows, such as sheds and garages that are non-contributing features to the Historic District, would also be removed.

Upon completion of the Project's Residential Option, the residential tower would be similar in height to other high-rise buildings along Vine Street, while the 10-story podium would transition to the lower scaled historical bungalows and other residential uses to the east. Along the eastern elevation, the podium would be terraced at Level 3. Furthermore, on the ground floor, the new building within the western portion of the Project Site would be separated from the relocated bungalows within the eastern portion of the Project Site by an approximately 22 to 57-foot publicly accessible buffer that would include a pedestrian walkway, open space, and landscaping.

Upon completion of the Project's Office Option, the office tower would be similar in height to other high-rise buildings along Vine Street. The Office Option would have a private buffer to separate the new building within the western portion of the Project Site and the relocated bungalows within the eastern portion of the Project Site. Open space and landscaping would be provided east of the buffer.

## e. Project Impacts

As discussed above, the Project proposes two development options—the Residential Option and the Office Option. The following analysis accounts for both development options and the term “Project” is used unless stated otherwise.

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

### (1) Impact Analysis

The Project involves four activities that have the potential to impact historical resources, namely the Afton Square Historic District: demolition, relocation, rehabilitation, and new construction. The following discussion analyzes the potential associated with these activities.

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

##### *(i) Demolition*

As stated above, the Project involves the demolition of four main buildings on the Project Site. 6272 De Longpre Avenue, 1330 Vine Street, and 1348 Vine Street are outside the boundaries of the Historic District and are not historical resources. Within the Historic District, the multi-family residential building at 6241 Afton Place would be demolished. 6241 Afton Place is identified as a non-contributing because it was constructed after the period of significance of the Historic District and is also not individually considered a historical resource based on the evaluation in the Historical Report. The

Project would also demolish the ancillary buildings, which include storage sheds, garages, and additional dwelling units behind the bungalows at 6249 Afton Place and 6254, 6256, and 6262 De Longpre Avenue within the Historic District. The ancillary buildings at 6256 and 6262 De Longpre Avenue and 6249 Afton Place were identified as non-contributing in a 1994 determination of eligibility. The ancillary building at 6254 De Longpre Avenue was not identified as contributing or non-contributing in 1994, but post-dates the period of significance (1939) of the Historic District and, therefore, should have been considered non-contributing, according to the instructions for evaluating historic districts.

As determined in the Historical Report, the demolition of 6272 De Longpre Avenue, 1330 Vine Street, 1348 Vine Street, and 6241 Afton Place would not result in a significant direct impact since these buildings are not historical resources. In addition, the demolition of the non-contributing 6241 Afton Place and ancillary buildings associated with at 6256 and 6262 De Longpre Avenue and 6249 Afton Place would not result in a substantial adverse change in the Historic District because they are not individually significant and do not contribute to the significance of the Historic District. The buildings are either not visible or minimally visible from the public right-of-way, so their presence has no bearing on the character of the Historic District. Based on the above, the Historic District would continue to be eligible for listing in the National Register, if the non-contributing buildings were demolished. It would continue to retain sufficient integrity as a whole to convey its significance. Therefore, demolition activities would not cause a substantial adverse change in the significance of a historical resource and impacts would be less than significant.

*(ii) Relocation*

The Project involves the relocation of six bungalows that contribute to the Historic District. Currently, three of the bungalows face De Longpre Avenue, while the other three bungalows face Afton Place. The Project would temporarily move all six of the bungalows off the Project Site during grading and construction activities. The three bungalows facing De Longpre Avenue would be relocated back to their original locations, while the three bungalows facing Afton Place would each be relocated one lot to the east of their original locations. The easternmost bungalow on Afton Place would replace the non-contributing building at 6241 Afton Place, which is not individually significant and would be demolished.

In determining the impacts on the Historic District, the central question is whether the relocation of the bungalows would affect the physical integrity of the Historic District to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the Historic District no longer retained sufficient integrity to convey its significance as one of the few remaining intact residential neighborhoods in Hollywood. According to *National Register Bulletin No. 15*, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. The only relevant aspects with respect to the impact of the relocation of the bungalows on the

Historic District are setting and feeling. Setting is defined as “the physical environment of a historic property” and feeling is defined as “a property’s expression of the aesthetic or historic sense of a particular period of time.”<sup>27</sup>

The activity of relocating the six bungalows would have a less-than-significant direct impact on the Historic District for several reasons. First and foremost, the bungalows would remain within the Historic District. Therefore, the general environment of the bungalows and the Historic District as a whole would not be significantly altered. The three bungalows facing De Longpre Avenue would be returned to the original locations. Although the three bungalows facing Afton Place would be returned to different locations, they would have the same order, orientation, and setback from the street as they had originally. In addition, the walkway and open space would have a positive effect of creating a buffer between the Historic District on the east and the proposed new development along Vine Street on the west. Therefore, the Historic District would retain integrity of setting within its boundaries.

Secondly, the Historic District would retain integrity of feeling because the arrangement of the relocated bungalows on Afton Place is consistent with the historic character and residential development pattern in the Historic District. The demolition of the non-contributing property at 6241 Afton Place would also have a positive effect on the Historic District because it would remove a visual intrusion that otherwise diminished the integrity of feeling.

The Historic District would continue to be eligible for listing in the National Register if the bungalows were relocated because it would continue to retain sufficient integrity, based on the relevant aspects of setting and feeling, to convey its significance. Therefore, the Project would have a less-than-significant impact. As previously discussed, the logistics of relocating the bungalows would be addressed in the Preservation Plan, which would be prepared in accordance with the Standards, as set forth in Project Design Feature CUL-PDF-1, above.

### *(iii) Rehabilitation*

The Project would include the rehabilitation of the six historic bungalows for adaptive reuse as restaurants or residential units. The activity of rehabilitating the six bungalows would result in a less-than-significant direct impact on the Historic District. Currently, the three bungalows on Afton Place are used as offices, and the three bungalows on De Longpre Avenue are vacant and in poor condition. The six bungalows would be relocated back to the Project Site on the lots described above and rehabilitated. The precise

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<sup>27</sup> *National Register Bulletin No. 15, p. 45.*

methods for rehabilitating the bungalows would be further addressed in the Preservation Plan, which would be prepared in accordance with the Standards as set forth in Project Design Feature CUL-PDF-1, above. Projects are considered to have a less-than-significant impact if they comply with the Standards.<sup>28</sup> Furthermore, the Preservation Plan would include construction monitoring to ensure compliance with the Standards through the construction process.

*(b) Indirect Impacts Analysis*

*(i) Afton Square Historic District*

In analyzing indirect impacts of new construction on the Historic District, the central question is whether the new building would affect the physical integrity of the Historic District to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the Historic District no longer retained sufficient integrity to convey its significance. According to *National Register Bulletin No. 15*, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. The only relevant aspects with respect to the impact of a new building on an adjacent historic district are setting and feeling. Setting refers to the character of the place in which the historical resource is situated; in this case within the boundary of the Historic District as well as its broader surroundings. Feeling is the expression of the time and place the historical resource gained significance. While *National Register Bulletin No. 15* does not directly address the impact of new construction on the setting or feeling of a historic district, it provides direction in assessing the impact of non-contributing buildings on the physical integrity of a listed historic district, as follows:

*When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of historic environment.*

As a result, this analysis of indirect impacts on the Historic District considers how the new construction might affect the Historic District's integrity of feeling and setting in terms of its relative number, size, scale, design, and location of visual intrusions.

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<sup>28</sup> Title 14 CCR Section 15126.4(b).

### Relative Number

When the Historic District was determined eligible for listing in the National Register in 1995, there were 51 contributing and 12 non-contributing properties identified. Since then, two contributing properties were demolished. The multi-family residence at 6109 Afton Place was demolished in the late 1990s, and the property is now the Resolve Recovery Center. The single-family residence at 6263 De Longpre Avenue was demolished in the early 2010s, and the property is now a surface parking lot. These demolitions represent the loss of two contributing properties, reducing the total number of contributing properties to 49. The total number of non-contributing properties is less clear, as parking lots are typically not counted as contributing or non-contributing. If the property at 6263 De Longpre Avenue was counted as non-contributing, the total number of non-contributing properties would be 14.

Seven of the ten properties within the Project Site are located within the Historic District. The Project would not affect the number of contributing buildings in the Historic District or the ratio of contributing to non-contributing buildings because the six bungalows would be preserved. As the new building would be outside the boundary of the Historic District, it would not be counted as contributing or non-contributing. Thus, the number of contributing properties would remain 49. The non-contributing property at 6241 Afton Place would be removed and replaced with a bungalow. However, the contributing property at 6255 Afton Place would become open space, and, thus, non-contributing. Therefore, the number of non-contributing properties would remain 14.

### Size, Scale, and Design

Size, scale, and design are often important factors in historic districts. The Afton Square Historic District includes a mix of single and multi-family residences in Arts and Crafts and Period Revival styles constructed between 1916 and 1939. Multi-family property types included one-story bungalow courts, two-story duplexes and fourplexes, and four-story apartment buildings. The contributing properties on the Project Site are all one-story bungalows that are mostly Colonial Revival in style. Across Afton Place there are more one-story bungalows, but across De Longpre Avenue, there is only one remaining one-story bungalow and surface parking lots.

Under the Residential Option, the new building is designed to step down from 32-stories (or approximately 360 feet) on the north to nine stories (or approximately 122 feet) on the south. Along the east elevation, the new building would step down to 2 stories (or 40 feet). Under the Office Option, the new building would be rectangular in shape and 17 stories in height (or 330 feet). In both the Residential Option and Office Option, a 22- to 57-foot buffer would be situated between the new building on the west and the bungalows on the east.

As a whole, the proposed building (either the Residential Option or Office Option) would not be compatible in size, scale, or design with the contributing properties within the Historic District. The new building would be significantly taller and much larger in massing than any of the contributing properties in the Historic District and specifically the relocated bungalows. However, the new building is oriented toward Vine Street, which is consistent with the historical development pattern along Vine Street and other commercial corridors in the vicinity. As early as the 1930s, residential properties along major thoroughfares such as Vine Street and Sunset Boulevard were redeveloped with commercial uses that encroached further into the adjacent residential neighborhoods over time. Historically, commercial development in these areas was not integrated with the residential neighborhoods, rather, they were intentionally oriented toward the traffic along the commercial corridor. The new building would affect the setting of the Historic District by introducing a new visual element to the skyline. However, there are modern buildings of comparable height to the new building already visible from within the boundary of the Historic District.

Thus, the integrity of feeling and setting would be diminished by the introduction of a new visual element to the skyline visible from within the boundary of the Historic District. However, the feeling of the Historic District that developed from 1916 to 1939 was already diminished by the development of high-rise buildings on Sunset Boulevard and Vine Street when it was determined eligible for listing in the National Register. The new building would diminish the Historic District's integrity of setting in terms of its broader setting, but not the immediate setting because it is outside the existing boundary and would not affect the Historic District to the degree it would no longer be eligible for listing in the National Register.

### Location

The western portion of the Project Site is located outside the western boundary of the Historic District, while the eastern portion of the Project Site is located within this boundary of the Historic District. The proposed high-rise building (either the Residential Option or Office Option) would be developed outside the boundary of the Historic District, while a portion of the proposed ground floor open space would be located within the boundary of the Historic District on the lot of 6255 Afton Place. The three bungalows facing Afton Place would be rehabilitated and relocated to the east of the 6255 Afton Place lot. The proposed subterranean parking levels would occupy the entire Project Site. Best practices in urban planning and historic preservation would allow the western boundary of the Historic District to be redrawn to eliminate the lot containing the new landscaped open space, rather than creating additional "buffer zones" or acreage not directly contributing to

the significance of the Historic District.<sup>29</sup> However, such a boundary change would not be required by ordinance or statute.

### Summary

The proposed new building would not diminish the integrity of the Historic District as a whole. The Project would not negatively affect the balance between the contributing and non-contributing buildings since the number of contributing and non-contributing buildings would remain the same. The proposed building (either the Residential Option or Office Option) would be located outside the boundary of the Historic District, but would visually intrude on the Historic District. However, the extent of the visual intrusion would not cause the Historic District to no longer be eligible for listing in the National Register. Furthermore, there would be a 22 to 57-foot wide buffer between the new building and the bungalows in the form of a landscaped walkway and open space. Therefore, the Project's new construction would have a less-than-significant impact on the Historic District and its contributing buildings.

#### *(ii) 1313 Vine Street*

In analyzing the potential indirect impacts of new construction on the building at 1313 Vine Street, the central question is whether the Project would cause a "material impairment" to the significance of the historical resource. Material impairment occurs where a project demolishes or alters the physical characteristics that convey the significance of a historical resource and that justify its inclusion in or eligibility for inclusion in national, state, or local landmark or historic district programs pursuant to the requirements of CEQA. Such an effect would only occur if the historical resource no longer retained sufficient integrity to convey their significance as a result of the Project.

The historical resource at 1313 Vine Street is not within the same block as the Project Site. It is sufficiently buffered from the proposed new construction by Vine Street, which is a broad four-lane thoroughfare flanked by parallel parking. Thus, the most important views of 1313 Vine Street, being the primary, street-facing elevation, would not be obscured as a result of the Project. Because 1313 Vine Street is located across the street from the Project Site, the new construction would not impact its integrity of immediate setting. It would not be affected by the Project due to the physical and visual separation between the historical resource and the Project Site. Furthermore, in the increasingly dense urban setting of Hollywood, the construction of new buildings across the street from historic buildings is not uncommon, and new development has already occurred adjacent to the historical resource at 1313 Vine Street.

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<sup>29</sup> *National Register Bulletin No. 16, p. 56.*

The broader surroundings of the identified historical resource have already been altered by demolition and new construction. The parcels within the Study Area are developed with a variety of mixed-use, commercial, and residential buildings as well as surface parking lots. Development does not reflect a single era or type of construction. The Study Area, especially along Vine Street, is largely characterized by development that occurred after 1980. Interspersed between these buildings are surface parking lots and a handful of commercial and residential buildings from earlier decades of the twentieth century.

As such, the changes to the broader surroundings of the historical resource presented by the Project would not cause an indirect impact to the setting of 1313 Vine Street. It would continue to convey its significance and remain eligible as a historical resource.

*(c) Conclusion*

Based on the above and as detailed in the Historical Report, the demolition of the non-contributing buildings, the relocation and rehabilitation of the six historic bungalows, and the construction of the new building would have a less-than-significant impact on the Afton Square Historic District. The bungalows would be relocated within the boundary of the Historic District and rehabilitated in accordance with the Preservation Plan, which would be prepared in compliance with the Standards. Thus, the significance of the bungalows as contributing buildings to the Historic District would be maintained and relocation and rehabilitation of the bungalows would have a less-than-significant impact on the Historic District. The new building would not be constructed within the boundary of the Historic District but would introduce a new visual element that is not compatible with the size, scale, or design of the contributing buildings. However, in the dense urban setting of Hollywood, there are already modern buildings of comparable height to the new building that are located along Sunset Boulevard and Vine Street and visible from within the boundaries of the Historic District. Thus, although the new building would impact the Historic District's integrity of setting and feeling, the impact would not be to the degree that the integrity of setting and feeling would be lost. Furthermore, the Project would not affect the other five aspects of integrity. After Project completion, the Historic District as a whole would retain sufficient integrity to convey its significance and would remain eligible for listing in the National Register and listed in the California Register. In addition, as discussed above, the Project would not result in any indirect impacts on historical resources in the vicinity, namely the building at 1313 Vine Street. As discussed above, the construction of new buildings across the street from historic buildings is not uncommon, and the broad setting of 1313 Vine Street has already been altered by demolition and new construction. **Therefore, the Project would not cause any change in the significance of a historical resource as defined in Section 15064.5 and, as such, would not result in direct or indirect impacts to historical resources on or in the vicinity of the Project Site.**

## (2) Mitigation Measures

Project-level impacts related to historical resources would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts with regard to historical resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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

### (1) Impact Analysis

The results of the archaeological records search indicate that there are no identified archaeological resources within the Project Site and one archaeological resource is located within a 0.5-mile radius of the Project Site. As the Project Site has previously been graded as part of previous construction activities, and most of the natural ground surface within the Project Site is occupied by urban development, archaeological surface finds on-site would be highly unlikely. In addition, as stated in the Geotechnical Investigations for the Project, which are included as Appendix G of this Draft EIR, artificial fill was encountered during field exploration to a depth of approximately 13 feet below existing ground surface and is likely the result of past grading or construction activities at the Project Site. Deeper fill may exist between excavations and in other portions of the site that were not directly explored. The Project would involve excavation of the Project Site to a maximum depth of approximately 45 feet below grade for the Residential Option and 83 feet below grade for the Office Option. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources.

To this end, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archaeological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified archaeologist to assess the find. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. **Overall, with adherence to the City's condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, impacts to archaeological resources would be less than significant, and no mitigation measures are required.**

## (2) Mitigation Measures

Project-level impacts with regard to archeological resources would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts with regard to archeological resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

***Threshold (c): Would the Project disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, Section 5097.98, and Health and Safety Code Section 7050.5(b))?***

## (1) Impact Analysis

The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5, PRC Section 5097.98, and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the relevant portion of the Project Site would be suspended, and the Los Angeles Department of Public Works (LADPW) as well as the County Coroner would be notified immediately. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours

In accordance with PRC Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. **With the implementation of regulatory requirements, the Project would not disturb any human remains, including those interred outside of dedicated cemeteries. Impacts to human remains would be less than significant.**

## (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

Project-level impacts with regard to the disturbance of human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

## f. Cumulative Impacts

### (1) Impact Analysis

As provided in Section III, Environmental Setting, of this Draft EIR, there are 102 related projects in the Project Site vicinity, as well as the Hollywood Community Plan Update. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects involve a variety of residential uses (i.e., apartments and condominiums), retail, restaurant, commercial, and office uses, consistent with existing uses in the Project Site area.

Although impacts to historical resources tend to be site-specific, cumulative impacts would occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As discussed above, the Project would not result in direct or indirect impacts to historical resources on or in the vicinity of the Project Site. In addition, none of the related projects are located within the boundary of the Afton Square Historic District. The closest project in the vicinity of the Project Site is Related Project No. 93 located at 1341 N. Vine Street, also known as Academy Square or Academy on Vine. According to the Academy Square Project Final EIR, published in 2016, one historical resource was demolished as a result of the Project.<sup>30</sup> The historical resource, a one-story supermarket originally constructed in 1962, was located outside the boundary of the Afton Square Historic District and would not have been considered significant within the same context. There are other historic districts in Hollywood Community Plan Area significant in the same context as the Afton Square Historic District. They comprised of similar residential property types constructed during the first few decades of the twentieth century and include the Melrose Hill Historic Preservation Overlay Zone (HPOZ), Spaulding Square HPOZ, Sunset Square HPOZ, Selma–La Baig California Register Historic District, and Vista de Mar-Carlos

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<sup>30</sup> *Academy Square Project Final Environmental Impact Report, November 2016, available at <https://planning.lacity.org/eir/AcademySquare/FEIR/FEIR%20Academy%20Square.html>, accessed January 10, 2022.*

California Register Historic District. None of the related projects would impact any of these historic districts. **Therefore, Project impacts to historical resources would not be cumulatively considerable, and cumulative impacts would be less than significant.**

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources or human remains are uncovered, each related project would be required to comply with applicable regulatory requirements and the City's Condition of Approval or any mitigation measures adopted for such other projects. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures could be established as necessary to address the potential for uncovering of archaeological resources. **Therefore, Project impacts to archaeological resources and human remains would not be cumulatively considerable, and cumulative impacts would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Cumulative impacts with regard to cultural resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.