

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Project. Historical Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section is based on information provided in Appendix C and Appendix J of this Draft EIR, which include the *Artisan Hollywood—Historical Resource Technical Report* (Historical Resource Report) prepared by GPA Consulting (December 2020), and the *Tribal Cultural Resources Report for The Artisan Hollywood Project* (TCR Report) prepared by Dudek (August 2022).

2. Environmental Setting

a. Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural 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 cultural resources of national, State, regional, and local significance include:

- The National Historic Preservation Act of 1966, as amended
- The Secretary of the Interior's Standards for the Treatment of Historic Properties
- The Native American Graves Protection and Repatriation Act
- The Archaeological Resources Protection Act
- The Archaeological Data Preservation Act
- The California Environmental Quality Act

- The California Register of Historical Resources
- The California Health and Safety Code
- The California Public Resources Code
- The City of Los Angeles General Plan
- The City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)
- The City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3)
- The City of Los Angeles Historic Resources Survey (SurveyLA); and
- Community Redevelopment Agency of the City of Los Angeles Redevelopment Plan Area Historic Surveys

(1) Federal

(a) National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment.”¹ The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.²

¹ 36 Code of Federal Regulations (CFR) 60.

² U.S. Department of the Interior, National Park Service, *National Historic Landmarks Frequently Asked Questions*, 2021.

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”³

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district’s significance and historic integrity determine its 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
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁴

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a 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.

A resource that is listed in or eligible for listing in the National Register is considered “historic property” under Section 106 of the National Historic Preservation Act.

³ *U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 5.*

⁴ *United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, p. 12.*

(i) Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the 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. The following four criteria for evaluation have been established to determine the significance of a resource:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.⁵

(ii) Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #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.”⁶ 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 meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance.”⁷ The

⁵ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 8.

⁶ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, pp. 7–8.

⁷ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 44.

Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of 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 be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

(iv) Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.⁸ Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.⁹ The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or

⁸ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 25.

⁹ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 41.

- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

(b) Secretary of the Interior's Standards

The National Park Service issued the Secretary's Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary's Standards provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

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

It is important to note that the Secretary's 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, and it is not necessary for a project to comply with every Standard to achieve compliance.

(c) Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.¹¹

¹⁰ *United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.*

(d) Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.¹²

(e) Archaeological Data Preservation Act

The Archaeological Data Preservation Act (ADPA) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

(2) State

(a) California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project 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.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social,

¹¹ U.S. Department of the Interior, National Park Service, Archeology Program, *Native American Graves Protection and Repatriation Act*.

¹² U.S. Department of the Interior, National Park Service, *Technical Brief #20: Archeological Damage Assessment: Legal Basis and Methods, 2007*.

political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is 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 there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.¹³ If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.¹⁴

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired."¹⁵ According to

¹³ *California Public Resources Code Section 21083.1(a).*

¹⁴ *State CEQA Statute and Guidelines, Section 15064.5(c)(4).*

¹⁵ *State CEQA Statute and Guidelines, Section 15064.5(b)(1).*

CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.¹⁶

(b) California Register of Historical Resources

The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁷ The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.¹⁸ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

¹⁶ *State CEQA Statute and Guidelines, Section 15064.5(b)(3).*

¹⁷ *California Public Resources Code, Section 5024.1[a].*

¹⁸ *California Public Resources Code, Section 5024.1[b].*

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

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

(c) California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

(d) California Public Resources Code (PRC)

California Public Resources Code (PRC) Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

(3) Local

(a) City of Los Angeles General Plan

(i) Conservation Element

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. 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 historic 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.¹⁹

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

(ii) Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project is located within the Hollywood Community Plan area.²⁰ The Hollywood Community Plan, adopted on December 13, 1988, and readopted in 2014, does not include any specific objectives or policies regarding cultural resources. However, the Community Plan incorporates the sites designated in the Cultural and Historic Monuments Element of the General Plan and encourages the addition of suitable sites thereto. In addition, the Hollywood Community Plan encourages the preservation and enhancement of well-defined residential neighborhoods in Hollywood through the application of Historic Preservation Overlay Zones, where appropriate, and/or the preparation of neighborhood preservation plans that further refine and tailor development standards to neighborhood character.

¹⁹ *City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.*

²⁰ *The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update. Information on the update can be accessed at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>.*

(b) City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The criteria for HCM designation are stated below:

- 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, city, or community; or
- The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
- The proposed HCM embodies the distinct characteristics of 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.²¹

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and OHR staff often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a “master” architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained “integrity”? Does it still convey its historic significance through the retention of its original design and materials?

²¹ *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”²²

(c) City of Los Angeles Historic Preservation Overlay Zone Ordinance

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zone (HPOZs) in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.²³ Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement

²² *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

²³ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

identifies the historic context, themes, and subthemes of the HPOZ, as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.²⁴ For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

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

The City of Los Angeles Historic Resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the

²⁴ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

*(e) Community Redevelopment Area of the City of Los Angeles
Redevelopment Plan Area Historic Surveys*

The Community Redevelopment Agency of the City of Los Angeles (CRA) was established in 1948 to revitalize economically underserved areas within the City of Los Angeles by increasing the supply of low income housing, providing infrastructure for commercial and industrial development, and creating employment opportunities.²⁵ To carry out these goals, CRA adopted comprehensive plans for each Redevelopment Project Area. The CRA was dissolved in February 2012, and administration of the Redevelopment Project Areas was initially transferred to the CRA/LA, a Designated Local Authority (DLA) and successor to the CRA. On September 30, 2019, the Los Angeles City Council voted to adopt Ordinance No. 186325 to effectuate the transfer of land use related plans and functions of the CRA/LA to the City of Los Angeles. As a result, the Department of City Planning has jurisdiction over review of properties located within Redevelopment Project Areas as of November 11, 2019.

Some Redevelopment Project Areas also include a historical resources survey that documents all of the historical resources—individual and districts—within the Redevelopment Project Area. These CRA and CRA/LA surveys were done independent of the City’s SurveyLA effort, though some of the more recent surveys may have used the

²⁵ *Community Redevelopment Agency of the City of Los Angeles, Who we Are, www.crala.org/internet-site/About/who_we_are.cfm, accessed February 9, 2021.*

same methodology and technology that was used in SurveyLA. SurveyLA did not survey areas already surveyed by CRA or CRA/LA. Currently, there are 32 Redevelopment Project Areas throughout Los Angeles.

The Hollywood Redevelopment Plan and Hollywood Redevelopment Project Area were established by the CRA in 1986 to encourage development in the Hollywood community, which was in a state of economic decline. The Hollywood Redevelopment Project Area is generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The goals of the Hollywood Redevelopment Plan include “the retention, restoration, and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.”²⁶

As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA conducted multiple historic surveys of the Hollywood Redevelopment Project Area in 1978, 1986, 1992, 1994, 1997, 2003, and 2009, and published an Historic Resources Survey Report for the project area in February 2010. Subsequently, the CRA/LA conducted new surveys between July 2018 and January 2020, and published an Historic Resources Survey Report for the Hollywood Redevelopment Plan Area on January 28, 2020.²⁷ While not part of SurveyLA, both the 2010 Survey and the 2020 Survey for the Hollywood Redevelopment Plan Area utilized the same technology and methodology to ensure that the findings are consistent with those of the rest of the Community Plan area and the City as a whole and could be integrated with the Historic Places LA online portal in the future.

b. Existing Conditions

(1) Historical Resources

(a) Description of Project Site and Study Area

The Project Site is bounded by Selma Avenue to the north, Ivar Avenue to the east, Sunset Boulevard to the south, and Cahuenga Boulevard to the west. The block is irregularly shaped with Ivar Avenue oriented at an angle off the north-south street grid. The topography of the Project Site is relatively flat. The Project Site is currently occupied by a

²⁶ *Community Redevelopment Agency of Los Angeles, Hollywood Redevelopment Plan, As First Amended on May 20, 2003.*

²⁷ *CRA/LA, Historic Resources Survey Report—Hollywood Redevelopment Plan Area, January 28, 2020.*

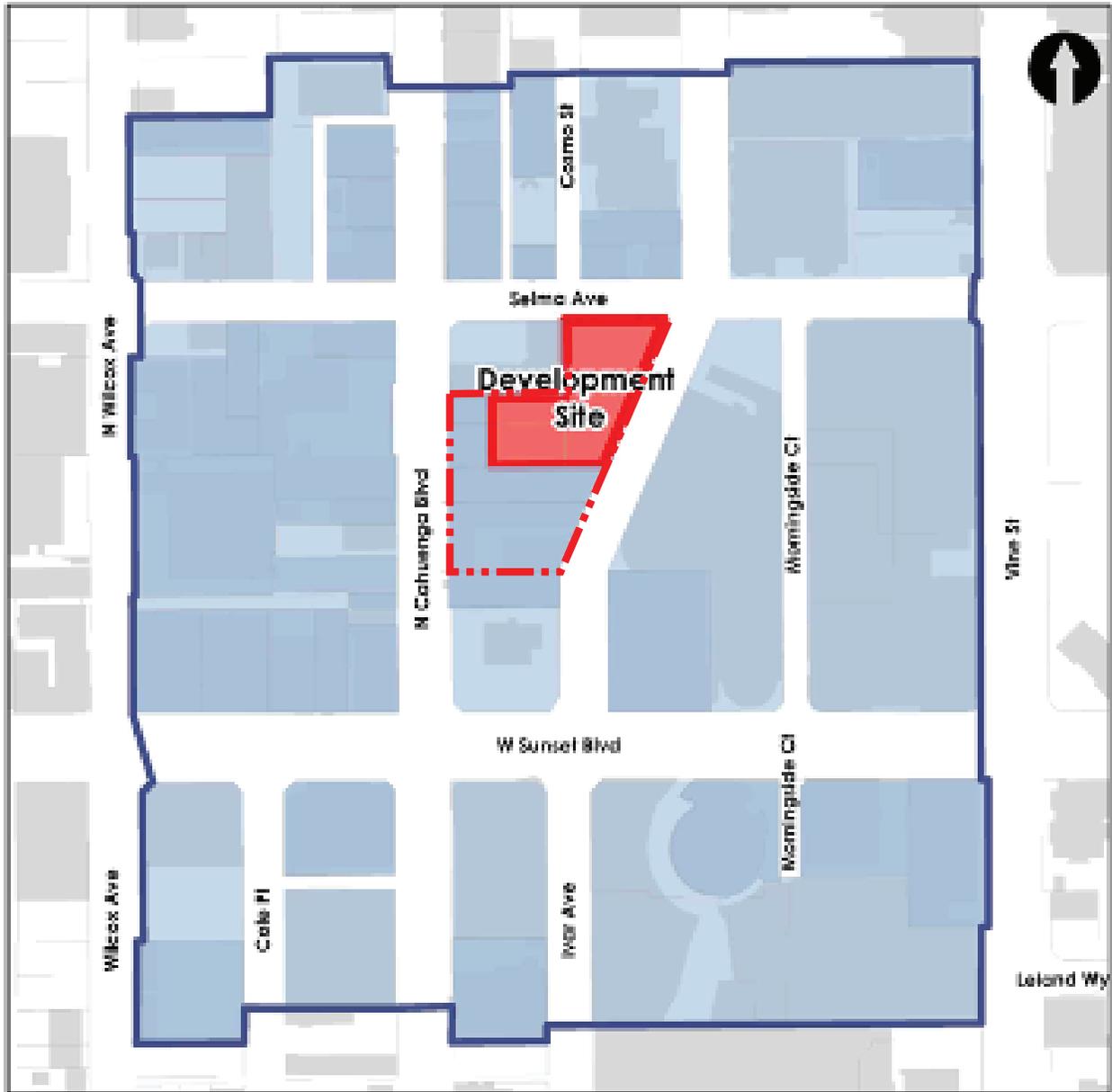
surface parking area (Development Area) and six one- and two-story structures that contain approximately 33,828 square feet of floor area and provide a variety of retail, restaurant, and service uses located generally within the southern and western portions of the Project Site along Ivar Avenue and Cahuenga Boulevard.

The study area established for the purposes of the historical resources analysis includes the Project Site and adjacent parcels within one block north, south, east, and west of the Project Site. As shown in Figure IV.B-1 on page IV.B-20, the study area includes the Project Site and a two-parcel deep buffer of all blocks sharing street frontage with the block containing the Project Site. The study area is roughly bounded by the irregular parcel boundaries north of Selma Avenue, Vine Street to the east, irregular parcel boundaries south of Sunset Boulevard, and Wilcox Avenue to the west. The existing buildings in the study area surrounding the Project Site are primarily commercial and mixed-use, with surface parking lots interspersed throughout the area. Buildings range from low, mid, and higher-rise buildings constructed between the 1900s through the 2010s.

(b) Historical Background and Context of the Project Site and Study Area

As discussed in the Historical Resources Report included as Appendix C of this Draft EIR, the Project Site and study area were first divided in 1887 as a part of the 120-acre tract subdivided by real estate developer Harvey Henderson Wilcox for the new community he named “Hollywood”. The block on which the Project Site is located originally extended from Cahuenga Boulevard on the west to Morningside Court on the east. The Project Site was fully developed with one-story single-family residences by 1919. By the mid-1920s, nearby Hollywood Boulevard had transformed into a densely developed commercial corridor with most blocks containing one- and two-story commercial buildings with taller, more visibly imposing buildings located at corners. Other major thoroughfares through Hollywood, such as Sunset Boulevard and Cahuenga Boulevard, were developed primarily with low-rise commercial and industrial buildings. Blocks bounded by these thoroughfares remained residential. Between 1919 and 1927, a one-story building used for light manufacturing was constructed in the southwest portion of the Development Area. This building, as noted on Sanborn maps, is associated with the address 1544½ Cahuenga Boulevard. However, this address does not appear in the City directories. The address 1544 Cahuenga Boulevard was used as the L. Clyde & Co. automobile glass dealership office from the 1920s through 1940s.

In 1930-1931, Ivar Avenue was extended south of Selma Avenue, bisecting the block containing the Development Area. This was part of a street improvement program call the “Five Finger” Street Plan to improve traffic circulation in Hollywood’s central business district as well as to reduce the size of the blocks in this area in order to create more parcels immediately abutting the public-right-of-way. Despite the reconfiguration of the adjacent streets, the early twentieth century residences and the



- Study Area Boundary
- Parcels in the Study Area
- Development Site
- Project Site
- Vacant Parking Lot

Figure IV.B-1
Historical Resources Study Area

building at 1544½ Cahuenga Boulevard appear to remain. No building permits could be located for the demolition of the single-family residences on the Project Site, but based on historic maps and aerials, the single-family residences were demolished sometime between 1947 and 1950. The majority of the Development Area was used as a surface parking lot by 1952, with the building located at 1544½ Cahuenga Boulevard demolished some time between 2002 and 2009 (no building permits could be located for the demolition of this building), with the entire Development Area subsequently used for surface parking.

(c) Historical Resources on the Project Site

The Project Site is currently occupied with a surface parking area (Development Area) and six one- to two-story buildings. No historic resources are located on the Project Site.

(d) Historical Resources in the Project Vicinity

As noted above, multiple historic surveys have been conducted in Hollywood between 1979 and 2020, in which eleven buildings have been identified as potential historic resources within the study area. While these surveys represent a rich history of identification, the CRA/LA Historic Resources Survey Report for the Hollywood Redevelopment Plan Area completed in January 2020 is the only survey completed in the last five years and, thus, is the primary survey utilized in the Historic Resources Report for its identification of potential historical resources within the Study Area. The 2020 Survey and, subsequently, the Historical Resource Report, identified one designated and seven potential historical resources within the study area.²⁸ These resources are described below, and the locations of the buildings are shown on Figure IV.B-2 on page IV.B-22:

- **1622 Wilcox Avenue (Location A):** Located northwest of the Project Site, this building is historically known as the Hotel Mark Twain. The three-story building was designed in Mission Revival style and constructed in 1923. The building was identified in the 2020 Survey as eligible for listing in the California Register and for local designation as a significant example of a property associated with Los Angeles' African American community.
- **6422 Selma Avenue (Location B):** Located west of the Project Site, the one-story Vernacular-style commercial building was constructed in 1909. It was identified in the CRA's prior 2010 Survey as eligible for listing in the California Register and for local designation. It was also identified in the 2020 Survey, but as eligible only for local designation. Both the 2010 and 2020 Surveys identified

²⁸ Three buildings previously identified are no longer potential historical resources, primarily due to substantial alterations prior to the 2020 Survey.

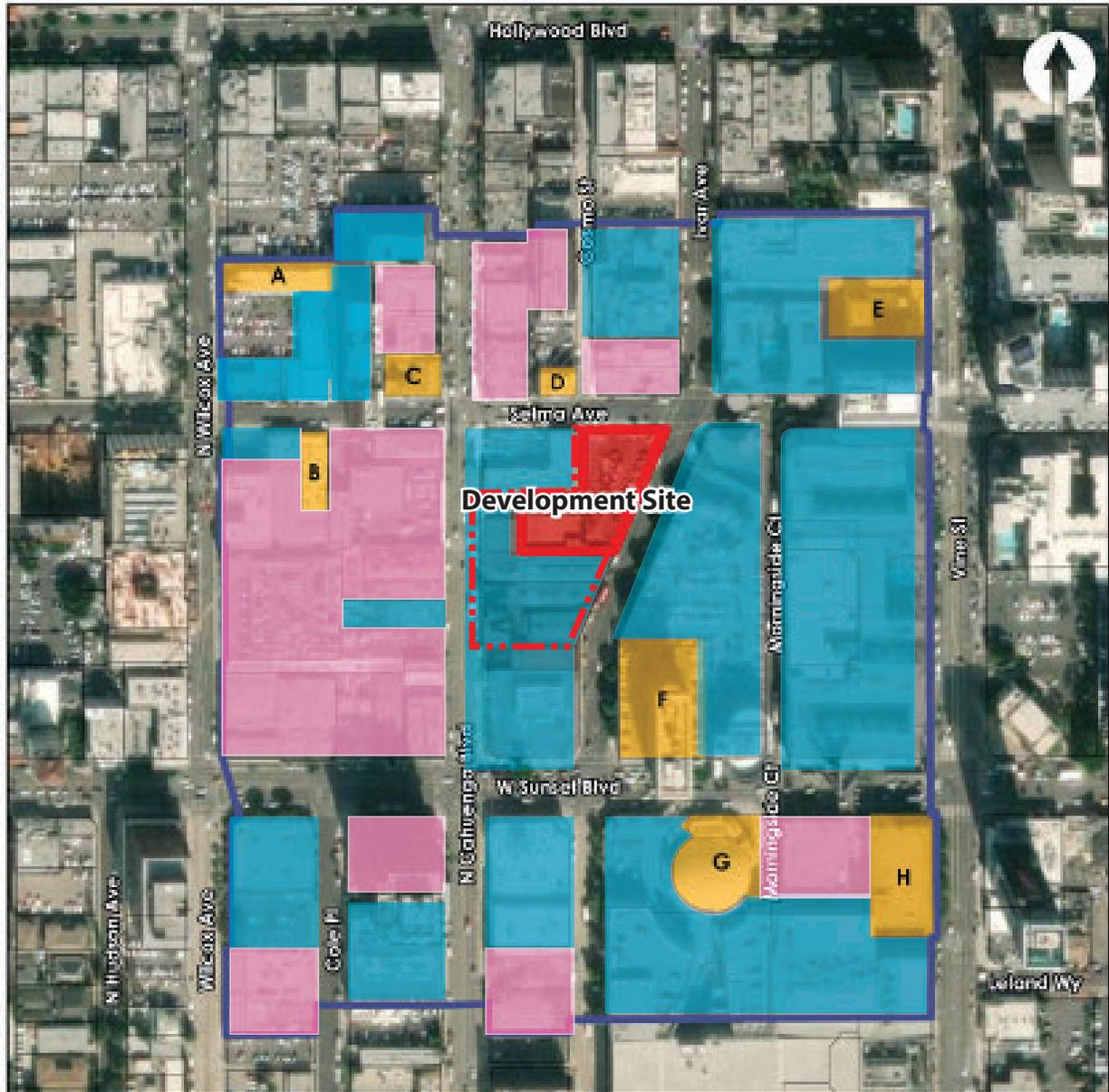


Figure IV.B-2
 Location of Designated and Potential
 Historical Resources in the Study Area

the building as a rare example of commercial development that pre-dates Hollywood's consolidation with the City of Los Angeles in 1910.

- **1601 Cahuenga Boulevard (Location C):** Located northwest of the Project Site, this building is historically known as the Maron building. This building is a two-story mixed-use building designed in a Neoclassical style by the architecture firm Meyer and Holler, Inc. and constructed in 1925. It was identified in the 2010 Survey as eligible for listing in the National Register, California Register, and for local designation. It was also identified in the 2020 Survey as eligible for listing in the California Register and for local designation. Both the 2010 and 2020 Surveys identified the building as a rare example of early commercial development located along a former streetcar line in Hollywood.
- **6361 Selma Avenue (Location D):** Located north of the Project Site, the two-story Vernacular-style building was designed by architect H.D. Frankfurt and constructed in 1925. Between 1961 and 1980, the building was used as a recording studio by Moonglow Records and Recording (later known as the Sound Factory), a prominent independent record label. It was identified in the 2010 Survey as eligible for listing in the California Register and for local designation. Both the 2010 and 2020 Surveys identified the building for its significant association with the recording industry.
- **1615 Vine Street (Location E):** Located northeast of the Project Site, this building is historically known as the Wilkes Vine Street Theater, Vine Theater, and Doolittle Theater. The two-story theater was designed in the Beaux Arts style by the architect Myron Hunt and constructed in 1926. It has been evaluated multiple times and has various status codes associated with these evaluations. It was identified in the 2010 Survey as eligible for listing in the National Register, California Register, and for local designation, although the 2010 inventory form does not note why the building is eligible for listing. It was identified in the 2020 Survey as eligible for listing in the California Register and for local designation for its significant association with the entertainment industry.
- **6363 Sunset Boulevard (Location F):** Located southeast of the Project Site, this building is historically known as the RCA West Coast Headquarters. The ten-story commercial office building was designed in the Corporate International style by the architect Albert C. Martin and constructed in 1963. It was identified in the 2010 Survey as eligible for listing in the California Register and for local designation for its association with the recording industry. It was identified in the 2020 Survey as eligible for listing in the National Register, California Register, and for local designation as an excellent example of Corporate International architecture as well as the work of Albert C. Martin.
- **6360 Sunset Boulevard (Location G):** Located southeast of the Project Site, this building is historically known as the Cinerama Theater. The one-story theater building was designed as a Googie-influenced concrete dome by the architectural firm Welton Becket & Associates and constructed in 1963. It is

designated as HCM No. 659 for its association with the history of the Pacific Theaters and Cinerama, Inc and association with the advancement in theater technology, specifically a widescreen display method that employed a deeply curved screen known as Cinerama. It is also an excellent example of Googie and Mid-Century Modern architecture as the work of Welton Becket & Associates.

- **6300 Sunset Boulevard (Location H):** Located southeast of the Project Site, this three-story bank and commercial office building was designed in the New Formalist style by the architectural firm Welton Becket & Associates and constructed in 1966. It was identified in the 2010 Survey as eligible for listing in the California Register, and for local designation as an excellent example of Late Modern architecture as well as the work of architect Welton Becket. It was identified in the 2020 Survey as eligible for listing in the National Register, California Register, and for local designation as an excellent example of New Formalist commercial architecture in Hollywood as well as the work of Welton Becket & Associates.

(2) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. As part of the Tribal Cultural Resources Report prepared for the Project and included as Appendix J of this Draft EIR, a cultural resources records search was conducted on July 25, 2017, April 2, 2020, and July 27, 2020, through the South Central Coastal Information Center (SCCIC) located at the California State University, Fullerton. The results of the record search indicate that a total of 37 cultural resource studies have been conducted within a 0.5-mile radius of the Project Site. As discussed in detail in the Tribal Cultural Resources Report and in Section IV.I, Tribal Cultural Resources, of this Draft EIR, five studies are mapped as overlapping the Project Site. The cultural resources studies that overlap the Project Site include:

- **LA-07562:** Greenwood and Associates prepared the Draft Supplemental Environmental Impact Statement (DSEIS), Core Study Alignments 1, 2, 3, 4, and 5 report for the Southern California Rapid Transit District Metro Rail Project MOS-2 in 1987. The report focused on the review of maps to determine whether construction activities related to the project would affect areas containing structural remains of potentially significant buildings or deposits of cultural remains. The nearest alignment to the Project Site, referred to in the study as Candidate Alignment No. 2, is the Hollywood/Vine location, which is two city blocks east of the Project Site. The study determined that there would be no effect to historic structures and did not find that secondary development would have destroyed the potential for significant cultural remains.
- **LA-07565:** Greenwood and Associates prepared the archaeological technical report Los Angeles Rail Rapid Transit Project “Metro Rail” Core Study, Candidate

Alignments 1 to 5: Draft Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report for the Southern California Rapid Transit District Metro Rail Project in 1987. The study consists of a literature review, archival research, and map research for evidence of potential archaeological resources at the proposed project areas. No archaeological resources were identified within the Project Site as a result of the 1987 study.

- **LA-07566:** The DSEIS, Core Study Alignments 1, 2, 3, 4, and 5; Archaeological Evaluation of Proposed Station Areas and Zones of Transition Between Aerial and Subway report was prepared by Roger G. Hatheway and Kevin J. Peter in 1987 for the Southern California Rapid Transit District Metro Rail Project MOS-2. The study consists of a literature review, archival research, and map research for evidence of potential archaeological resources at the proposed project areas. No archaeological resources were identified within the Project Site as a result of the 1987 study.
- **LA-08020:** The 1987 Cogstone report Los Angeles Rail Rapid Transit Project “Metro Rail” Core Study: Draft Supplemental Environmental Impact Statement, Draft Subsequent Environmental Impact Report was prepared for the Southern California Rapid Transit District. The report supplements a previous historical/architectural resources report that was prepared for a draft environmental document. The study consists of a collection of maps and areas of potential effect that are analyzed in the initial report. No cultural resources are identified within this report; however, the report does provide a list of properties that were evaluated as a result of the project, none of which are archaeological resources that were identified within the Project Site.
- **LA-11797:** Chattel Architecture, Planning & Preservation, Inc. (Chattel Architecture) prepared historic context statements and intensive-level assessment surveys for the Hollywood Redevelopment Project Area. The Hollywood Redevelopment Project Area totals 1,107 acres and is located approximately six miles northwest of the Los Angeles Civic Center at the foot of the Hollywood Hills. The Project Site is within the Hollywood Redevelopment area. The goal of updating the historic context statements and field surveys was to evaluate properties for eligibility for local, state, or national designation to focus effort on preserving those buildings that best illustrate the unique narratives of each community, while allowing for appropriate economic development (Chattel Architecture 2010).

The records search also found two historic-era archaeological sites located within a 0.5-mile radius of the Project Site.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, 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 §15064.5?

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

Threshold (c): Disturb any human remains, including those interred outside of formal cemeteries?

For this analysis, the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA Thresholds Guide*, as appropriate and as available, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate impacts to cultural resources:

(1) Historic Resources

A project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic 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; and/or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

According to Appendix G of the State CEQA Guidelines, the threshold of significance is whether a project causes a substantial adverse change in the significance of

a historical resource pursuant to State CEQA Guidelines Section 15064.5. That section provides a detailed definition of “substantial adverse change.” In summary, the definition of substantial adverse change and, hence, the threshold of significance, is whether a project demolishes or materially alters in an adverse manner the physical characteristics that convey historical significance of the resource or that justify its eligibility for the California Register or a local register such as the list of HCMs. In other words, if a project would render an eligible historic resource ineligible then there would be a significant adverse effect under CEQA.

This refinement to the factors listed in the City’s L.A. CEQA Thresholds Guide has been reviewed and concurred with by the City Planning Department’s Office of Historic Resources.

(2) Archaeological Resources

A project would normally have a significant impact on archaeological resources if it 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-old²⁹ and possesses substantial stratigraphic integrity; or,
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

²⁹ 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.

b. Methodology

(1) Historical Resources

The Historical Resources Report provided in Appendix C of this Draft EIR is based, in part, on a review of the California Historical Resources Information System (CHRIS), which includes data on properties listed and determined to be eligible for listing in the National Register, California Register, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resources surveys and other planning activities. The Historical Resources Report is also based on review of the Los Angeles Historic Resources Inventory Website (HistoricPlacesLa.org) to determine if any properties within the Study Area are designated HCMs or located within an HPOZ, and a review of the findings for the 2010 and 2020 Historic Resources Surveys for the Hollywood Redevelopment Plan Area to determine if any properties within the Study Area were identified as potential historical resources. As indicated above, 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.

(2) Archaeological Resources and Human Remains

To address potential impacts to archaeological resources (including human remains), formal records searches were conducted by the SCCIC to assess the archaeological sensitivity of the Project Site and vicinity. 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 or human remains.

c. Project Design Features

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

d. Analysis of Project Impacts

Threshold (a): Would the project cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5?

(1) Impact Analysis

(a) Direct Impacts

There are no historical resources on the Project Site and no historical resources would be demolished, destroyed, relocated, or altered as a result of the Project. Therefore, the Project would have no direct impacts on historical resources.

Based on the above, the Project would not directly cause a substantial adverse change in the significance of a historical resource.

(b) Indirect Impacts

Potential indirect impacts were analyzed to determine if the Project would cause a “material impairment” to the significance of the one designated and seven potential historical resources in the study area. Material impairment would occur if 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 resources in the study area no longer retained sufficient integrity to convey their significance as a result of the Project.

As discussed above, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. Because the Project would not directly alter the physical features of the designated historical and potentially historical resources in the study area, the only relevant aspect with respect to potential indirect impacts of the new building on these historical resources is setting. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property or historic district as well as the resource’s broader surroundings. The analysis of indirect impacts considers whether the integrity of setting of the historical resources in the study area would be diminished by the new construction to the degree they would no longer qualify as historical resources under national, state, or local landmark or historic district programs.

As previously discussed, there are one listed and seven potential historical resources in the study area. None of the designated historical and potentially historical resources are within the same block as the Project Site and all of them are separated from the Project Site by a street. Furthermore, views of the historical resources would not be obscured by the Project, and none of the street-facing elevations of the historical resources would be obscured or altered by the Project.

The Project Site is located outside the parcel boundaries of the eight historical resources in the Study Area and therefore would not impact their integrity of immediate setting. Furthermore, seven of the eight historical resources are physically and visually separated from the Development Area and thus, would not be impacted by the Project. The potentially historical building located at 6361 Selma Avenue is located northwest of the Project Site, across Selma Avenue, and is not separated from the Project Site by intervening buildings.

The construction of new buildings across the street from historical buildings is not uncommon in the increasingly dense urban setting of Hollywood, and new development has already occurred in close proximity to 6361 Selma Avenue and other historical resources in the study area. In addition, the broader surroundings have already been altered by demolition and new construction. The study area is developed with a variety of mixed-use, commercial, and residential buildings as well as surface parking areas, that do not reflect a single era or type of construction. The study area, especially along Ivar Avenue and Vine Street, is largely characterized by development that occurred after 1980. Interspersed between these buildings are surface parking areas and a handful of commercial and residential buildings from earlier decades of the twentieth century.

In assessing impacts from adjacent new construction on an individual historical resource (in this case, the building at 6361 Selma Avenue), it must be determined whether or not the new building would affect the physical integrity of the historical resource to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the historic building no longer retained sufficient integrity to convey its significance. The Los Angeles Historic Context Statement (LAHCS) prepared by the Office of Historical Resources establishes eligibility standards for associated property types. The context used for the evaluation of 6361 Selma Avenue was the Entertainment Industry and the sub-theme for the Recording Industry. The integrity thresholds for recording studios indicate that, to be eligible, a recording studio should retain integrity of location, design, feeling, and association from the period of significance.

The Project would introduce a new visual element to the setting of the identified historical resources, as the Project would replace an existing surface parking area with a new 25-story building reaching 268 feet in height to the top of the parapet. However, the overall integrity of setting in the study area is relatively low due to the substantial amount of development and new construction that has occurred (or is currently underway) in the study area. Furthermore, the Project has been designed to relate to the surrounding area with a 39-foot-high podium primarily finished with brick, with a variety of other finishes, materials, and textures. These changes in material and color, along with cantilevered balcony decks and horizontal overhangs, would divide the building into multiple vertical and horizontal elements, thereby creating articulation and adding visual interest. Landscaping around the perimeter of the podium level (Level 4) terrace would further serve to break up the building

planes and add visual interest, particularly along Selma Avenue. Additionally, the tower portion of the new building would be primarily situated along Ivar Avenue, with a relatively small portion of the tower extending along Selma Avenue. While the Project would introduce a new visual element to the study area, it would not affect the setting of any of the identified historical resources, including the building located at 6361 Selma Avenue. In addition, the Project would not affect the physical integrity of the designated historical and potentially historical buildings within the study area, including the building located at 6361 Selma Avenue, to the degree that they would no longer qualify as historical resource. The eight historical resources, including the building at 6361 Selma Avenue, would also remain highly visible and would continue to be prominent features of the block on which they are located. Therefore, the Project would not have any impact on the physical characteristics that convey the historic significance of the eight identified designated historical and potentially historical resources and justify their inclusion in, or eligibility for, applicable landmark and historic district designation programs. **As such, the Project would not indirectly cause a substantial adverse change in the significance of a historical resource.**

Based on the above, and as discussed in more detail in the Historical Resource Report, the Project would not directly or indirectly cause a change in the significance of a historical resource as defined in Section 15064.5. Therefore, impacts to historical resources would be less than significant.

(2) Mitigation Measures

Project impacts to historic resources would be less than significant. Therefore, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

Project impacts to historic resources would be less than significant without mitigation.

Threshold (b): Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?

(1) Impact Analysis

As previously discussed, the results of the archaeological records search indicate that there are no identified archaeological resources within the Project Site and that two archaeological resources are located within a 0.5-mile radius of the Project Site. While these findings do not preclude the potential for an archaeological site to be identified during

construction activities associated with the Project, encountering archaeological resources is unlikely since the Project Site has previously been graded as part of previous construction activities. However, the Project would require excavation to depths up to 50 feet below grade for construction of the subterranean parking levels, which is greater than previously excavated depths and would reach native soils. Therefore, it is possible that archaeological resources that were not identified during prior construction or other human activity may be present. The City of Los Angeles 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 of 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. **Therefore, with the implementation of regulatory requirements and adherence to the Condition of Approval, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and, as such, any potential impacts related to archaeological resources would be less than significant.**

(2) Mitigation Measures

Project Impacts related to archaeological resources would be less than significant. Therefore, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

Project impacts related to archaeological resources would be less than significant without mitigation.

Threshold (c): Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

(1) Impact Analysis

The Project Site is located within an urbanized area and has been subject to previous grading and development. Furthermore, no known traditional burial sites have been identified on the Project Site. If human remains were discovered during construction of the Project, work in the immediate vicinity would be halted until the County Coroner has examined the remains, pursuant to California Health and Safety Code Section 7050.5. Disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. In addition, as outlined in Section IV.I, Tribal Cultural Resources, of this Draft EIR, if the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the

Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5(c)). **With the implementation of regulatory requirements, the Project would not disturb any human remains. Impacts related to human remains would be less than significant.**

(2) Mitigation Measures

Project impacts related to human remains would be less than significant. Therefore, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

Project impacts related to human remains would be less than significant without mitigation.

e. Cumulative Impacts

(1) Impact Analysis

As provided in Section III, Environmental Setting, of this Draft EIR, there are 46 related projects in the Project Site vicinity. 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 include a variety of residential uses, retail, restaurant, commercial, and office uses, consistent with existing uses in the Project Site area.

(a) Historical Resources

Impacts on historical resources tend to be site-specific. However, cumulative impacts on historical resources would occur if the Project and related Projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property as those within the Project Site. There are five related projects located within the Study Area, which include:

- Related Project No. 1: Cahuenga Boulevard Hotel, 1525 Cahuenga Boulevard—No historical resources are being demolished, destroyed, relocated, or altered as a result of this related project.
- Related Project No. 2: Ivar Gardens Hotel, 6409 Sunset Boulevard—No historical resources are being demolished, destroyed, relocated, or altered as a result of this related project.

- Related Project No. 3: 6400 Sunset Mixed-Use Project, 6400 Sunset Boulevard—No historical resources are being demolished, destroyed, relocated, or altered as a result of this related project.
- Related Project No. 5: Selma Wilcox Hotel, 6421 Selma Avenue—This project was completed in 2017. No historical resources were demolished, destroyed, relocated, or altered as a result of this related project.
- Related Project No. 29: 6445 Sunset Hotel, 6445 Sunset Boulevard—No historical resources are being demolished, destroyed, relocated, or altered as a result of this related project.

These projects would continue an established pattern of development in Hollywood and there is no potential for cumulative impacts to the setting of historical resources in the immediate vicinity as a result of this development pattern. Therefore, there would be no potential for cumulative impacts in the immediate vicinity.

Cumulative impacts to historical resources must also consider changes within the same historic district. However, the Project Site is not located within the boundaries of a historic district. Therefore, there would be no potential to contribute cumulative impacts to a historic district.

Additionally, cumulative impacts to historical resources must consider whether a project substantially diminishes the number or significance of historical resources of the same property type, even if they are not otherwise on the related projects list. However, the Development Area is currently vacant and used for surface parking. Therefore, there would be no potential to contribute cumulative impacts to historical resources of the same property type.

Therefore, Project impacts to historical resources in the Project vicinity would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Archaeological Resources and Human Remains

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. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established, as necessary, to address the potential for uncovering archaeological resources or human remains. Alternatively, the Condition of Approval established to

address inadvertent discoveries of archaeological resources would be applied to the related projects, as applicable. **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 would be required.

(3) Level of Significance After Mitigation

Cumulative impacts to cultural resources would be less than significant without mitigation.