

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section evaluates potential impacts to historical resources 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. This section is based on information provided in the Historical Resources Technical Report (Historical Resources Report) prepared for the Project by Historic Resources Group, February 2022, and included in Appendix C of this Draft EIR.

The Project's potential impacts on the remaining topics covered under cultural resources, including archaeological resources and human remains, were fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, and determined to be less than significant. The analysis included in the Initial Study prepared for the Project is summarized below.

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 (Secretary's Standards);
- The Native American Graves Protection and Repatriation Act;
- The Archaeological Resources Protection Act;

- The Archaeological Data Preservation Act;
- The California Environmental Quality Act (CEQA);
- The California Register of Historical Resources (California Register);
- The California Health and Safety Code;
- The California Public Resources Code;
- The City of Los Angeles General Plan;
- The Hollywood Community 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
- The Hollywood Redevelopment Plan

(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

¹ 36 Code of Federal Regulations (CFR) 60.

National Historic Landmark Districts as possessing exceptional national significance in American history and culture.²

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

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

³ *United States 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.*

- 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.

(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.

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

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

(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 National 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

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

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

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

- 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
- 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 of the Interior'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 of the Interior'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 of the Interior's Standards for Rehabilitation 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 of the Interior'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.

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.*

(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

(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

¹¹ *United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, 1990.*

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

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, 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

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

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

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 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

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

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].*

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:

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

California 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) Hollywood 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 Site is located within the planning boundary of the Hollywood Community Plan, adopted in December 1988. The City is currently in the process of updating the Hollywood Community Plan. In the meantime, the existing Hollywood Community Plan remains in effect. The Hollywood Community Plan does not specifically address historic resources; however, a stated objective of the Hollywood Community Plan is to "encourage the protection and enhancement of the varied and distinctive residential character of the Community." In addition, the Housing Policy in the Hollywood Community Plan "encourages the preservation and enhancement of well-defined residential

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

neighborhoods in Hollywood through (1) application of Historic Preservation Overlay Zones where appropriate, and/or (2) preparation of neighborhood preservation plans which further refine and tailor development standards to neighborhood character.” The Plan also reiterates that it is “the City’s policy that the Hollywood Community Plan incorporate the sites designated on the Cultural and Historical Monuments Element of the General Plan.”²⁰

(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 is reflected or exemplified; or
- The proposed HCM is associated with the lives of historic personages or important to national, state, city, or local history; or
- The proposed HCM embodies the distinct 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.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 Office of Historic Resources (OHR) staff often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?

²⁰ *City of Los Angeles, Hollywood Community Plan, adopted by City Council in December 1988 and effective April 2, 2014, p. HO-2.*

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

- 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?
- 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

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

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

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (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 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*

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,

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

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

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 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) Hollywood Redevelopment Plan

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)

²⁵ *Community Redevelopment Agency of the City of Los Angeles, Who we Are, www.crala.org/internet-site/About/who_we_are.cfm, accessed March 24, 2022.*

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 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 compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations were compiled from historic surveys in 1986, 1997, and 2003 and were made available on the CRA website. The most recent intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2009 and made available on the SurveyLA website to provide information regarding the status of properties in the Hollywood Redevelopment Project Area and to help identify potential historic resources (2009 CRA Survey).²⁷ Because the CRA was dissolved on February 6, 2012, as previously mentioned, administration of the Hollywood Redevelopment Project area has been transferred to the Department of City Planning.

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

²⁷ *Chattel Architecture, Planning & Preservation, Inc., “Intensive Historic Resources Survey, Hollywood Redevelopment Project Area,” prepared for the Community Redevelopment Agency of the City of Los Angeles, February 2010, revised January 2012.*

b. Existing Conditions

(1) Project Site

As shown in Figure IV.B-1 on page IV.B-20, the Project Site is occupied by three commercial buildings: 6450 W. Sunset Boulevard, spanning the width of the north side of the Project Site; 1420-1434 N. Wilcox Avenue; and 1413 N. Cole Place, located at the northwest corner of the intersection of W. De Longpre Avenue and N. Cole Place. The existing buildings on the Project Site comprise approximately 26,261 square feet of floor area consisting of a one-story, 16,932-square-foot commercial building along Sunset Boulevard and Wilcox Street/Cole Place (6450 W. Sunset Boulevard), a one-story, 4,446-square-foot commercial office building along Wilcox Street, and a two-story, 4,883-square-foot commercial office building along Cole Place and De Longpre Avenue. The buildings are surrounded by asphalt-paved surface parking areas and an alley provides through access between N. Wilcox Avenue and N. Cole Place just north of 1413 N. Cole Place.

(2) Historical Background of the Project Site

As previously discussed, the Project Site is located in the Hollywood community of the City. The Hollywood area was originally part of two former Spanish land grants: Rancho La Brea and Rancho Los Feliz. Both land grants were strategically oriented along the Cahuenga Pass, a major transportation corridor to the north, and the growing city of Los Angeles to the south. The Cahuenga Pass encompassed part of the Camino Real del Rey, the principal coastal passageway used continuously as a trail facilitating commerce, livestock transport, and travel since the earliest Spanish exploration. Hollywood began as a small agricultural community in the nineteenth century. A freight rail line was first constructed in 1887-1888, linking Hollywood and the neighboring community of Colgrove to downtown Los Angeles. The fields and orchards of the nineteenth century increasingly gave way to speculative real estate development by the turn of the twentieth century.

As discussed in the Historical Resources Report, the Project Site contains three commercial buildings, which were constructed over time. As described in the Initial Study included in Appendix A of this Draft EIR as well as in the Historical Resources Report, the Project Site was developed in the early 1900s with single-family residences and industrial and commercial uses. In 1919, the northern portion of the Project Site fronting Sunset Boulevard was occupied by two one-story stores, a detached garage, and a vacant warehouse. The southern portion of the Project Site fronting De Longpre Avenue was occupied by three single-family residences.

The area surrounding the Project Site continued to develop with commercial and residential uses through the mid-1940s. Between 1928 and 1938, Wilcox Avenue was



Figure IV.B-1
Project Site

extended south of Sunset Boulevard, and the north portion of the Project Site was redeveloped with a gas station and auto repair shop. In 1941, a one-story commercial building was developed by Vernon Farquhar at 1432 N. Wilcox Avenue. In 1945, Farquhar developed an additional one-story retail building at 1424–1430 N. Wilcox Avenue.

In 1950, the gas station and auto repair building remained at the north side of the Project Site. Located south of the gas station were nine single-family residences, two duplexes, two one-story store buildings, and two store blocks that were constructed in the 1940s. Between 1950 and 1952, the gas station was demolished. By 1954, both duplexes and three single-family residences had been removed from the Project Site. Between 1954 and 1962, three single-family residences were demolished, a large rear addition was made to the store at 1432 N. Wilcox Avenue, and a smaller rear addition was made to the store at 1424 N. Wilcox Avenue.

By the mid-1980s, the two remaining residences on the Project Site were demolished. In 1985, World Opportunities Inc. constructed a two-story commercial building at 1413 N. Cole Place. In 1993, Staples, Inc. demolished the auto repair building at the northern end of the Project Site and hired Fieldhouse Designs to design a one-story retail building at 6450 W. Sunset Boulevard.

Between 2005 and 2009, the rear additions at 1424 and 1432 N. Wilcox Avenue were demolished.

(3) Previously Identified Historical Resources

(a) Project Site

As previously discussed, the Project Site is currently occupied by three commercial buildings with associated surface parking areas. As provided in the Historical Resources Report, a records search was conducted at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at the California State University, Fullerton on February 5, 2020. The records search included a review of all previous cultural resource studies and previously documented historic or architectural resources associated with the Project Site. No information related to the Project Site was located as part of the records search. Additionally, none of the buildings on the Project Site are listed in the Built Environment Resource Directory, a database of previously evaluated resources maintained by the California Office of Historic Preservation.

Most recently, an intensive historical resources survey of the Hollywood Redevelopment Plan Area was conducted by Architectural Resources Group, GPA Consulting, and Historic Resources Group in 2020. The survey of the Hollywood Redevelopment Project Area was conducted using the methodology established by the

OHR for SurveyLA and the report includes California Historical Resources Status Codes as assigned by SurveyLA. None of the buildings on the Project Site were identified as a potential historic resource in the most recent survey or in any previous surveys of the Hollywood Redevelopment Plan Area.

(b) Project Site Vicinity

As shown in Figure IV.B-2 on page IV.B-23, the Project Site is situated directly northwest of Fire Station No. 27 (1355 N. Cahuenga Boulevard), which is listed in the National Register of Historic Places and is a HCM. Additionally, the Project Site is situated in the near vicinity of several historic resources that were identified as being eligible for designation during the historic resources survey of the Hollywood Redevelopment Plan Area in 2020. These include the commercial buildings at 6464 W. Sunset Boulevard and 1501 N. Cahuenga Boulevard, and the De Longpre Park Residential Historic District.

(i) Fire Station No. 27

Fire Station No. 27 is located at 1355 N. Cahuenga Boulevard (alternate address is 1333 Cole Place), southwest of the Project Site at the intersection of De Longpre Avenue and Cahuenga Boulevard, shown as Identified Resource no. 1 in Figure IV.B-2. The two-story Italian Renaissance Revival fire station designed by P.K. Schabarum was constructed in 1930. Fire Station No. 27 was designated individually as HCM No. 165 in 1976, and was listed in the National Register of Historic Places in 1985 (as Engine Co. No. 27). The building was designated under Criterion C/3 as “an example of Italian Renaissance Revival architecture for public service usage.” Because Fire Station No. 27 is individually listed in the National Register and as a HCM, it is considered a historical resource for the purposes of CEQA.

(ii) 6464 W. Sunset Boulevard

6464 W. Sunset Boulevard is located west of the Project Site, across Wilcox Avenue, shown as Identified Resource no. 2 in Figure IV.B-2. The property was evaluated during the most recent survey of the Hollywood Redevelopment Project Area in 2020. The 1968 Corporate International style office building was identified as eligible for listing in the National Register, California Register, and as a HCM as an excellent example of Corporate International commercial architecture in Hollywood. Because it was identified as eligible for listing as a historical resource through survey evaluation, the property at 6464 W. Sunset Boulevard is treated herein as a historical resource for the purposes of CEQA.

(iii) 1501 N. Cahuenga Boulevard

1501 N. Cahuenga Boulevard is located northeast of the Project Site, across W. Sunset Boulevard, shown as Identified Resource no. 3 in Figure IV.B-2. The property

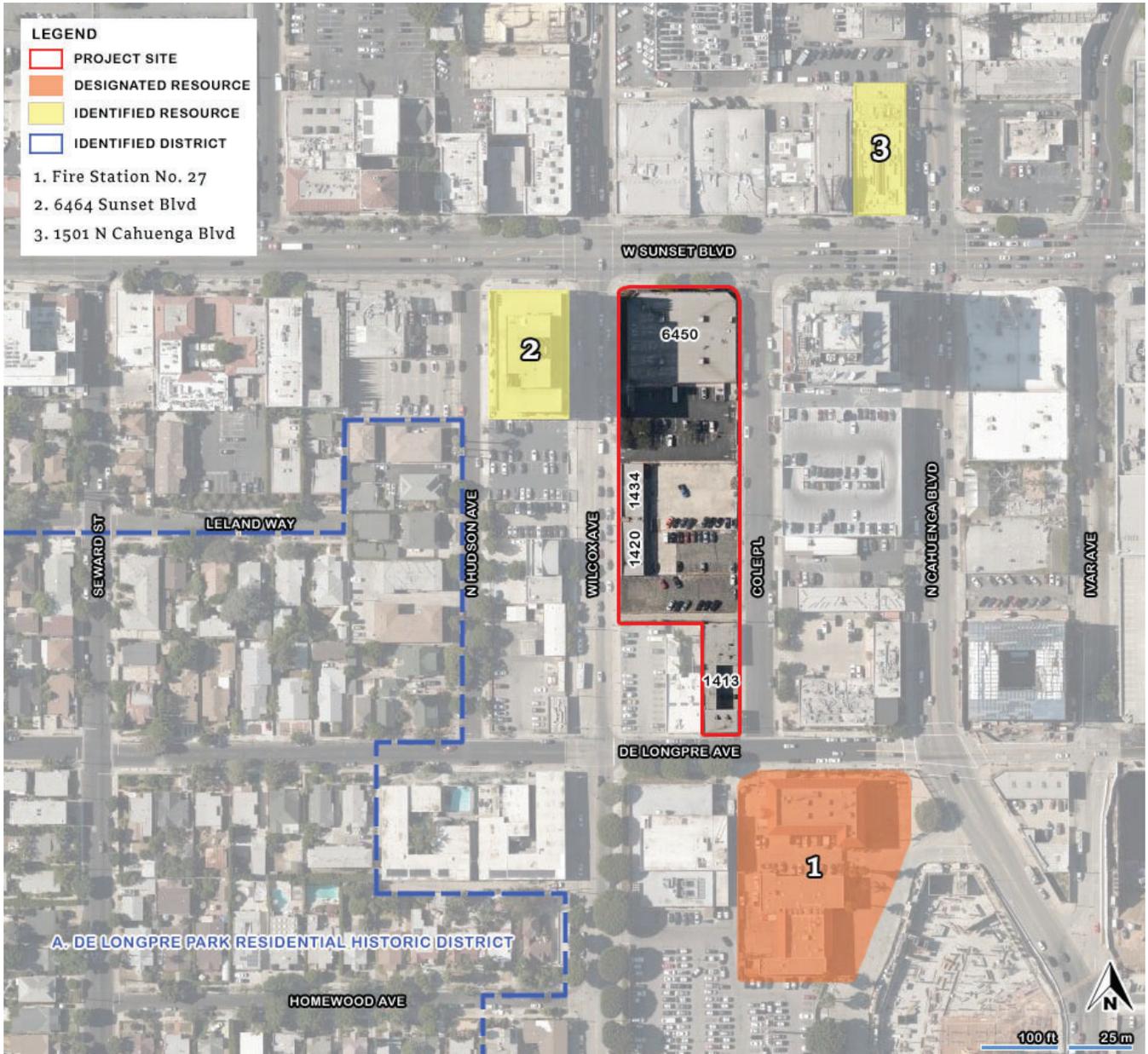


Figure IV.B-2
 Map of the Study Area

was evaluated during the most recent survey of the Hollywood Redevelopment Project Area in 2020. The 1914 Commercial Vernacular building was identified as eligible for listing in the California Register and as a HCM as a rare, remnant example of early commercial development located along a former streetcar line in Hollywood. Because it was identified as eligible for listing as a historical resource through survey evaluation, the property at 1501 N. Cahuenga Boulevard is treated herein as a historical resource for the purposes of CEQA.

(iv) De Longpre Park Residential Historic District

As shown in Figure IV.B-2 on page IV.B-23, the De Longpre Park Residential Historic District is located west and south of the Project Site. It encompasses an irregularly shaped area that is generally bounded by Leland Way on the north, Fountain Avenue and Homewood Avenue on the south, Hudson and Wilcox avenues on the east, and Cherokee Avenue on the west. The district consists of a concentration of pre-World War II residential properties and is primarily composed of small, modest, single-family residences that were built during the first three decades of the 20th century. These houses are sited on deep, narrow lots, and are one (and occasionally two) stories in height. Contributing buildings are designed in a variety of architectural styles that were popular at the time. American Colonial Revival, Craftsman, and Spanish Colonial Revival are the most common styles in the district, but some of the earliest houses exhibit characteristics of Late Victorian era styles. Interspersed between these houses are a handful of multi-family dwellings that generally complement the neighborhood's scale and character, as well as a few examples of larger-scale multi-family properties—mostly apartment houses—that were built after World War II and do not contribute to the district. Near the center of the district is De Longpre Park, a 1.5-acre pocket park that gave the district its name and is the focal point of the neighborhood.

The De Longpre Park Residential Historic District was evaluated during the most recent historic resources survey of the Hollywood Redevelopment Project Area in 2020, and was found eligible for listing in the California Register and as a Historic Preservation Overlay Zone as a significant example of an early 20th century residential neighborhood that was developed in proximity to streetcar lines. The period of significance has been identified as 1906-1950, which accounts for the district's primary period of development, and also captures some compatible examples of multi-family residential development from the very early postwar period. Within the district are 137 properties, of which 88 (64 percent) contribute to its significance. Because it was identified as eligible for listing as a historical resource through survey evaluation, the De Longpre Park Residential Historic District is treated herein as a historical resource for the purposes of CEQA.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines 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 a 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.

As previously noted, the Project's potential impacts on archaeological resources and human remains were fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, and determined to be less than significant. The analysis included in the Initial Study prepared for the Project is summarized below.

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 factors to evaluate impacts to cultural resources if the project 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 Project 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.²⁸ 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.²⁹

b. Methodology

The Historical Resources Report provided in Appendix C of this Draft EIR is based, in part, on historic permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, local histories, as well as review of the National Register and its annual updates, the California Register, and the City of Los Angeles's inventory of historic properties and previously conducted historical resources surveys to identify any previously recorded properties within or near the Project Site. Field examinations were conducted to review and confirm previous findings and to identify previously unevaluated properties that may be potentially eligible on the Project Site, and on parcels immediately adjacent to the Project Site. Examinations were also conducted to review and confirm previous findings for any known resources across Sunset Boulevard to the north, De Longpre Avenue to the south, Cole Place to the east, and Wilcox Avenue to the west of the Project Site. Properties previously identified as eligible for historic listing were assessed for their physical integrity to determine if alterations conducted since the previous evaluation had adversely affected their ability to convey historic significance. 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.

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 a historical resource pursuant to §15064.5?

²⁸ CEQA Guidelines, Section 15064.5(b).

²⁹ CEQA Guidelines, Section 15064.5(b)(1).

(1) Impact Analysis

(a) *Evaluation of Historic Significance*

(i) *Project Site*

6450 W. Sunset Boulevard

As detailed in the Historical Resources Report, the building located at 6450 W. Sunset Boulevard was constructed in 1993. It is a utilitarian commercial building and does not display any distinctive characteristics associated with a style, type, period, or method of construction. The building was designed by Fieldhouse Designs and constructed by Crandall & Sons. Little information could be found about either firm and no documentation was discovered that would suggest either firm is considered a master architect, designer or builder. There is no evidence found to suggest that the building identifies with important events of national, state, or local history; or that it exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community. Additionally, no evidence was found to suggest that the building is associated with the lives of historic personages important to national, state, city, or local history. Overall, no evidence was found to indicate that the building has potential historical significance or represents exceptional importance as required for buildings that may have achieved significance in the recent past. Therefore, 6450 W. Sunset Boulevard is not considered a historical resource for the purposes of CEQA.

1413 N. Cole Place

The building at 1413 N. Cole Place was constructed in 1985 by Lane Co. The building is strictly utilitarian in design and is not a distinctive or representative example of any architectural style, building type, period, or method of construction. Little information was found about the construction firm and the architect for the building has not been identified. No evidence was found to suggest that the commercial retail building is identified with important events of national, state, or local history; or that it exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city, or community. Similar to 6450 W. Sunset Boulevard, discussed above, no evidence was found to suggest that the building at 1413 N. Cole Place is associated with the lives of a person or persons important to national, state, city, or local history. No evidence was found to indicate that the building has potential historical significance or represents exceptional importance as required buildings that may have achieved significance in the recent past. Therefore, 1413 N Cole Place is not considered a historical resource for the purposes of CEQA.

1424 & 1432 N. Wilcox Avenue

The buildings at 1424 and 1432 N. Wilcox Avenue were both originally constructed over 80 years ago in the 1940s. Due to their age, both buildings were previously evaluated in the most recent survey for the Hollywood Redevelopment Project Area in 2020. The eligibility of the buildings is described below. As discussed in the Historical Resources Report, since the eligibility criteria for local HCM designation align in large degree with the eligibility criteria of the National Register and the California Register, the following evaluation considers eligibility under each of the criteria at the federal, state, and local levels under a single heading. Based on the significance evaluation, 1424 & 1432 N. Wilcox are not considered historical resources for the purposes of CEQA.

- **Criterion A/1/1:** The commercial buildings at 1424 and 1432 N. Wilcox Avenue were not identified as significant under the relevant development theme in the most recent survey for the Hollywood Redevelopment Area in 2020. The buildings were initially developed in 1945 and 1941, respectively, as one-story store buildings in an area historically developed with single-family residential buildings and commercial/industrial uses fronting W. Sunset Boulevard. Their development coincided with the rapid redevelopment of Hollywood after World War II, when commercial corridors were widely updated or redeveloped. The buildings were developed during the period of significance identified for the one-story storefront block property type in SurveyLA, and are located on a street served by automobile traffic. However, neither building is an excellent example of the property type. Additionally, both buildings have undergone substantial alteration over time, including large rear additions which have since been removed, the replacement of exterior wall cladding, the replacement of windows and doors at the rear (east) façade, the enclosure of several entry doors and the addition of wrought iron fencing at the primary (west) façade. Therefore, the buildings do not retain essential character-defining features from the period of significance, and do not retain sufficient integrity to convey their historic character as one-story storefront blocks. Therefore, neither 1424 nor 1432 N. Wilcox Avenue is eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion A/1/1.
- **Criterion B/2/2:** No documentation was found to suggest that any owner of either 1424 or 1432 N. Wilcox Avenue rose to prominence in their profession or made significant contributions to growth or development in Los Angeles. Although Vernon Farquhar, who was the original owner of both 1424 and 1432 N. Wilcox Avenue, was a Southern California businessman active in the Hollywood Board of Trade, no evidence was found to suggest that he made important individual contributions to the history of Los Angeles, or to the state or nation. Therefore, neither 1424 nor 1432 N. Wilcox Avenue is eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion B/2/2.

- **Criterion C/3/3:** The one-story commercial buildings at 1424 and 1432 N. Wilcox Avenue were initially developed in 1945 and 1941, respectively, as store buildings. Neither building was identified as an example of a commercial property type or as an example of an architectural style in the most recent survey of the Hollywood Redevelopment Project Area in 2020. Both buildings were constructed during the period of significance for the one-story storefront block property type and are one-story in height, set to the sidewalk, and accommodate multiple tenants. However, neither building is an excellent example of the type. Additionally, as described above, both buildings have undergone substantial alteration over time. Furthermore, the buildings at 1424 and 1432 N. Wilcox Avenue do not embody the distinctive characteristics of a particular architectural style. No evidence was found to suggest that an architect or designer was involved in the design of any of the buildings on the site. As such, neither of the buildings at 1424 and 1432 N. Wilcox Avenue are eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion C/3/3.
- **Criterion D/4/4:** Criterion 4 addresses potential archaeological resources and does not apply to 1424 & 1432 N. Wilcox Avenue.

As summarized above and discussed in detail in the Historical Resources Report, the existing buildings on the Project Site are not considered historical resources for the purposes of CEQA.

(ii) Project Site Vicinity

As discussed in the Historical Resources Report and summarized above, there is one designated historical resource in the vicinity of the Project Site, Fire Station No. 27 located at 1355 N. Cahuenga Boulevard (alternate address is 1333 Cole Place), southwest of the Project Site at the intersection of De Longpre Avenue and Cahuenga Boulevard. Fire Station No. 27 was designated individually as a HCM No. 165 in 1976 and was listed in the National Register of Historic Places in 1985 (as Engine Co. No. 27). Additionally, the Project Site is situated in the near vicinity of several historic resources identified as eligible for historic listing during the recent historic resources survey of the Hollywood Redevelopment Plan Area in 2020. These include the commercial buildings at 6464 W. Sunset Boulevard and 1501 N. Cahuenga Boulevard, and the De Longpre Park Residential Historic District. These are also treated as historical resources for purposes of this analysis.

(b) Potential Direct Impacts to Historical Resources

The Project would require the demolition of the existing commercial buildings and associated surface parking lots on the Project Site. As detailed in the Historical Resources

Report and summarized above, the existing buildings on the Project Site do not qualify as historical resources. As such, demolition of the existing buildings on the Project Site would not result in a direct impact to an historical resource. Therefore, the potential for direct impacts to historical resources as a result of removing existing on-site buildings would be less than significant.

(c) Potential Indirect Impacts to Adjacent Historical Resources

As discussed in the Historical Resources Report, alteration of a historical resource, or the immediate surroundings of a historical resource such that its significance would be materially impaired constitutes a substantial adverse change under CEQA. The significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that conveys its historical significance and justify its inclusion in, or eligibility for inclusion in the California Register of Historical Resources or in a local register of historical resources.” For the Project to be considered a substantial adverse change, it must be shown that the integrity and/or significance of the nearby resources would be materially impaired by the Project. Potential impacts to historical resources identified adjacent to the Project Site are analyzed below.

(i) Fire Station No. 27

The Project does not include the demolition, relocation, rehabilitation, alteration, or conversion of the fire station building. As discussed in the Historical Resources Report, all character-defining features of the fire station will remain unchanged and in their existing location. With regard to change in surroundings, the Project would be 275 feet in total height and much taller than the two-story fire station. Thus, the Project would introduce a new backdrop to Fire Station No. 27. Notwithstanding, the proposed new building would not result in a significant adverse effect to Fire Station No. 27, since the features important to its significance are contained within the fire station property and the Project would not alter the building’s Italian Renaissance Revival architecture, or its character as a historic fire station. In addition, there are existing buildings in the vicinity are taller than Fire Station No. 27, including the 14-story CNN building and an 11-story office building located northeast and northwest, respectively, of the fire station. The Project also would not block important street views of the fire station building. Specifically, public views of Fire Station No. 27 are best experienced looking west from Cahuenga Boulevard towards the Fire Station’s east elevation and looking south from De Longpre towards the Fire Station’s north elevation. The Project would be located across De Longpre Avenue to the northwest of Fire Station No. 27 and would not obscure the building’s east- and north-facing façades, which would remain unobstructed from view after implementation of the Project.

As noted previously, integrity is the ability of a historical resource to convey its historical significance. The Project would not affect the integrity of location, design,

materials, or workmanship of Fire Station No. 27. The resource would remain intact in its current location and would not be materially altered by new construction associated with the Project. Therefore, integrity of feeling would also remain unaffected because all the existing physical elements that characterize the fire station would remain unaffected as all the existing physical elements that characterize the fire station would remain and continue to convey their historic significance. All-important physical characteristics of the fire station would remain and would continue to reflect its association as a 1930s Italian Renaissance Revival style fire house, and therefore integrity of association would also remain unaffected by the Project. Setting features important to Fire Station No. 27 that could be affected by the Project include its location at the corner of Cahuenga Boulevard and De Longpre Avenue, and its orientation toward Cahuenga Boulevard. The one- and two-story commercial buildings and associated surface parking areas to the northwest across De Longpre Avenue that currently occupy the Project Site do not represent setting features that are character-defining or important to the historic significance of Fire Station No. 27. Therefore, adding additional height and mass adjacent to Fire Station No. 27 would not adversely alter the setting of the fire station such that its listing on the National Register would be threatened.

In summary, the overall integrity of Fire Station No. 27 would be retained as all relevant aspects of integrity would be unaffected by the Project. While the Project would alter the immediate surroundings, this alteration would not materially impair the fire station such that it can no longer convey its historic significance. Public views of Fire Station No. 27 looking west from Cahuenga Boulevard and looking south from De Longpre Avenue would also remain unobstructed. After construction of the Project, Fire Station No. 27 would remain intact and continue to convey its historic significance. For these reasons, the significance and integrity of Fire Station No. 27 would not be materially impaired by alterations to its surroundings caused by the Project. Therefore, the Project would not result in significant impacts to Fire Station No. 27.

(ii) 6464 W. Sunset Boulevard

The building at 6464 W. Sunset Boulevard is located west of the Project Site, across Wilcox Avenue. The Project does not include the demolition, relocation, rehabilitation, alteration, or conversion of the 6464 W. Sunset Boulevard building. The building at 6464 W. Sunset Boulevard would remain unchanged and in its original location. The Project also would not block views of the 6464 W. Sunset Boulevard building as the Project would be located east of the 6464 W. Sunset Boulevard building and would not obscure the building's important north-facing façade.

The Project would not affect the integrity of location, design, materials, or workmanship of the 6464 W. Sunset Boulevard building. As previously discussed, the 6464 W. Sunset Boulevard building would remain intact and in its current location and

would not be materially altered by the Project to the east. Integrity of feeling would also remain unaffected because all the existing physical elements that characterize 6464 W. Sunset Boulevard would continue to convey the property's historic significance. In addition, the 6464 W. Sunset Boulevard building would retain integrity of location, design, materials, workmanship and feeling; therefore, it would continue to reflect its history as an example of Corporate International commercial architecture in Hollywood. Thus, the integrity of association would also remain unaffected by the Project. Moreover, the one- and two-story commercial buildings and associated surface parking areas that currently occupy the Project Site do not represent features that are character-defining or important to the historic significance of 6464 W. Sunset Boulevard. Therefore, the integrity of setting would also be retained for 6464 W. Sunset Boulevard.

Overall, while the Project would add new height and mass adjacent to the 6464 W. Sunset Boulevard building, all aspects of integrity would be unaffected by the Project. 6464 W. Sunset Boulevard would remain intact and would continue to convey its historic significance. Thus, the significance and integrity of 6464 W. Sunset Boulevard would not be materially impaired by the Project and the building would retain its eligibility for listing in the National Register, California Register, and for designation as a HCM. The Project would not result in significant impacts to 6464 W. Sunset Boulevard.

(iii) 1501 N. Cahuenga Boulevard

1501 N. Cahuenga Boulevard is located northeast of the Project Site, across Sunset Boulevard. As discussed in the Historical Resources Report, the Project Site is located approximately 200 feet from 1501 N. Cahuenga Boulevard and is separated by multiple parcels and Sunset Boulevard. The Project would not include the demolition, relocation, rehabilitation, alteration, or conversion of the 1501 N. Cahuenga Boulevard building. 1501 N. Cahuenga Boulevard would remain unchanged and in its original location after implementation of the Project. Additionally, street views of 1501 N. Cahuenga Boulevard from Sunset Boulevard or Cahuenga Boulevard would not be blocked by the Project as it would be located southwest of it. New construction southwest of this site would also not obscure the building's important south- and east-facing façades, which would remain unobstructed from view after implementation of the Project.

The Project would not affect the integrity of location, design, materials, or workmanship of the 1501 N. Cahuenga Boulevard building. Specifically, the 1501 N. Cahuenga Boulevard building would remain intact in its current location and would not be materially altered by new construction. Therefore, integrity of feeling would remain unaffected because all the existing physical elements that characterize the 1501 N. Cahuenga Boulevard building would continue to convey the property's historic significance. Because 1501 N. Cahuenga Boulevard would retain integrity of location, design, materials, workmanship, and feeling, it would continue to reflect its history as a rare remnant example

of early commercial development located along a former streetcar line in Hollywood. Therefore, integrity of association would also remain unaffected by the Project. Moreover, the one- and two-story commercial buildings and associated surface parking areas to the southwest across W. Sunset Boulevard that currently occupy the Project Site do not represent setting features that are character-defining or important to the historic significance of 1501 N. Cahuenga Boulevard. Therefore, 1501 N. Cahuenga Boulevard would also retain integrity of setting.

Although the Project would add new height and mass in the near vicinity of 1501 N. Cahuenga Boulevard, all of the aspects of integrity 1501 N. Cahuenga Boulevard would be unaffected by the Project and the historic integrity of 1501 N. Cahuenga Boulevard would be retained. After construction of the Project, 1501 N. Cahuenga Boulevard would remain intact and continue to convey its historic significance. For these reasons, the significance and integrity of 1501 N. Cahuenga Boulevard would not be materially impaired by the Project and the building would retain its eligibility for listing in the California Register and for designation as a HCM. The Project would not result in significant impacts to 1501 N. Cahuenga Boulevard.

(iv) De Longpre Residential Historic District

The De Longpre Park Residential Historic District is historically significant as an example of an early 20th century residential neighborhood that was developed in proximity to streetcar lines. The De Longpre Park Residential Historic District contains 137 properties, of which 88 (64 percent) contribute to its significance.

The Project Site is located approximately 200 feet outside the district, with multiple parcels and Wilcox Street separating the district from the Project Site. New construction proposed as part of the Project would remain outside of the district boundaries. The Project does not include the demolition, relocation, rehabilitation, alteration, relocation or conversion of any contributing or non-contributing building to the De Longpre Park Residential Historic District. All of the existing buildings and sites that comprise the district would remain unchanged and in their original location after implementation of the Project.

Despite introducing a taller building to the skyline looking north or east from within the De Longpre Park Residential Historic District, the proposed new building would not result in a significant adverse effect to the De Longpre Park Residential Historic District. Features important to the significance of the De Longpre Park Residential Historic District are largely contained within the district boundaries and are best experienced from within the district itself. The new construction associated with the Project would not interrupt the configuration of buildings and sites, their spatial relationships to each other, and their relationship to the street that characterize the district as it is experienced from the public right-of-way.

The Project would not affect the integrity of location, design, materials, or workmanship for the De Longpre Park Residential Historic District or any of its component elements. These resources would remain intact in their current locations and would not be materially altered by new construction associated with the Project. Therefore, integrity of feeling would also remain unaffected because all the existing physical elements that characterize the district and contributing buildings would remain and continue to convey their historic significance. Since all the important physical characteristics of the district would remain, they would continue to reflect their important associations with early 20th century residential development in proximity to streetcar lines. Therefore, integrity of association would also remain unaffected by the Project. Setting features important to the De Longpre Park Residential Historic District that could be affected by the Project are largely contained within the district boundaries and are experienced by the public from public rights-of-ways within the district, as previously discussed. These include the configuration of streets and sidewalks fronting district contributors. As discussed in the Historical Resources Report, adding a new building north and east of the district would not adversely alter its setting such that its eligibility for listing in the California Register or as an HPOZ would be threatened.

Overall, the integrity of the De Longpre Park Residential Historic District and all of its contributing elements (e.g., buildings and/or contributing elements of the district) would be retained. As discussed in the Historical Resources Report, while the Project would alter the general surroundings of the district, this alteration would not materially impair the district such that it can no longer convey its historic significance. After construction of the Project, the De Longpre Park Residential Historic District would remain intact and continue to convey its historic significance. Therefore, the Project would not result in significant impacts to the De Longpre Park Residential Historic District.

(d) Conclusion

Based on the above, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Therefore, impacts to historical resources would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to historical resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, based on the records search conducted by the SCCIC, no archaeological resources have been found at the Project Site. Specifically, SCCIC records indicate that two previously recorded cultural resources have been documented within 0.5 mile of the Project Site. None of these resources overlap, intersect, or are adjacent to the Project Site. Nevertheless, it is always possible that unknown and unanticipated intact archaeological deposits and/or features could be present at subsurface levels. 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, as concluded in the Initial Study, 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, as determined in the Initial Study, impacts to archaeological resources would be less than significant, and no mitigation measures are required.**

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, 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. In addition, if human remain were discovered during construction of the Project, in accordance with Section 7050.5 of the California Health and Safety Code, work in the immediate vicinity of the find would be halted, the County Coroner, construction manager, and other entities shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working

days of notification of the discovery, the appropriate treatment and disposition of the human remains. Disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or 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 most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. **Overall, as concluded in the Initial Study, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required.**

e. Cumulative Impacts

(1) Impact Analysis

As provided in Section III, Environmental Setting, of this Draft EIR, there are 55 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 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 historic resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area 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. CEQA Section 15355 defines a cumulative impact as "two or more individual effects which, when considered together, are considerable or compound or increase other environmental impacts." The Project has not been shown to have either a direct or indirect impact on historical resources adjacent to the Project Site. In addition, none of the related projects would impact the historical resources identified adjacent to the Project Site. **Therefore, Project impacts to**

historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts with regard 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 or included, and the impact level would remain less than significant.