

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. Historic 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. The analysis of potential impacts to historic resources is based, in part, on the *Historical Resources Technical Report—1000 Seward Street, Los Angeles* (Historic Report) prepared by Historic Resources Group (January 2021), included as Appendix C of this Draft EIR.

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, Section 12.20.3); and
- The City of Los Angeles Historic Resources Survey (SurveyLA).

(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

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

¹ 36 Code of Federal Regulations (CFR) 60.

² United States Department of the Interior, National Park Service, *National Historic Landmarks Frequently Asked Questions*, www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm, accessed February 22, 2021.

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.

(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 CFR, Part 60, Section 60.4(g). In addition, a resource must be significant in American history,

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.*

architecture, archaeology, engineering, or culture. 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 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

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. 7–8.*

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

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
- 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

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.*

- 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.

(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.*

¹¹ *United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, www.nps.gov/archeology/tools/laws/nagpra.htm, accessed February 22, 2021.*

(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. 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. 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, 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.

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

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 CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is

¹³ *California Public Resources Code Section 21083.1(a)*, http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=21083.2, accessed February 22, 2021.

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

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

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 Guidelines, 15064.5(b)(3).*

¹⁷ *California Public Resources Code, Section 5024.1[a], http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=5024.1, accessed February 22, 2021.*

¹⁸ *California Public Resources Code, Section 5024.1[b], http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=5024.1, accessed February 22, 2021.*

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) 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.

As discussed in Section IV.E, Land Use, of this Draft EIR, 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. An updated plan has been drafted and the corresponding EIR is underway. Until the update is formally adopted by the City, the existing Hollywood Community Plan remains in effect.²⁰

The Hollywood Community Plan does not specifically address cultural 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

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

²⁰ *The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in February 2021 and is available at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>. The City Planning Commission recommended approval of the draft Plan on March 18, 2021, the Department of City Planning released the letter of determination on August 18, 2021, and the draft plan is currently awaiting consideration by the City's Planning and Land Use Management committee.*

Community.” In addition, the Housing Policy in the Hollywood Community Plan “encourages the preservation and enhancement of well defined residential 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 Hollywood Community 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.”²¹

(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 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 notable work of a master designer, builders, or architect whose individual genius influenced his or her age.²²

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:

²¹ *City of Los Angeles, Hollywood Community Plan, adopted by City Council in December 1988 and effective April 2, 2014, p. HO-2.*

²² *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

- 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?
- 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 Los Angeles Municipal Code (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 Check List, as specified in Section 19.05 of the LAMC. If the Initial Study and Check List 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.”²³

²³ *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

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

The Los Angeles City Council adopted the ordinance enabling the creation of 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.²⁴ 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.²⁵ 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)

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

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

²⁵ *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

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.

b. Existing Conditions

(1) Project Site

The Project Site is located within the planning boundary of the Hollywood Community Plan area. The Project vicinity is developed with a mix of industrial, commercial, and residential uses. Land uses located adjacent to the Project Site include an approximately 64-foot tall parking structure and multi-family residential buildings to the north; a 76-foot-tall office building and an above-grade parking structure to the west; a 76-foot-tall office/commercial building and industrial uses to the south; and multi-family residential buildings to the east. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with two one-story buildings totaling 10,993 square feet, comprised of a 2,551-square-foot restaurant and 8,442-square-foot studio and production space, along with surface parking areas.

The following discussion of the existing buildings on the Project Site is based on the Historic Report included as Appendix C of this Draft EIR.

(a) 1000 Seward Street

1000 Seward Street (also referred to as 6565 Romaine Street) is located at the southwest corner of the Project Site, at the intersection of Seward and Romaine Streets. The one-story commercial building is set back from the sidewalk by a planter with mature trees and shrubs at the south and west, and by a low brick planter with a concrete cap at the northwest corner. The building has a complex plan, simple massing, and asymmetrical composition, while the building exhibits characteristics of two architectural styles.

The southwest wing has features of Streamline Moderne architecture, which is discussed in detail below. The wing is rectangular in plan with a rounded southwest corner. There is a bow-truss roof with parapet and built-up roofing. Exterior walls are of brick masonry with panels of cement plaster and a projecting band clad in cement plaster wrapping the building and forming a lintel for all windows. There are wide bands of masonry divided by recessed bricks creating speedlines at the upper third of the south façade, and a band of masonry with tooled joints forms a ribbon with windows along the south façade. Fenestration consists of divided-light steel sash awning windows. The primary entrance is asymmetrically located on the west façade, and consists of a single divided-light steel door. There is a secondary door at the east side of the south façade, consisting of a single flush steel door.

The northeast wing is commercial vernacular in design with Mid-century Modern details at the south façade. It is set back from the street by a small parking area paved in asphaltic concrete and a full-width veranda screened by concrete breeze blocks and wrought iron security gates. The wing is rectangular in plan. There is a combination roof with parapet and built-up roofing. Exterior walls are painted masonry. Fenestration consists of aluminum sash windows with security bars. The primary entrance is asymmetrically located on the east façade, sheltered beneath a projecting fabric awning, and consists of a pair of fully-glazed aluminum storefront doors with sidelights and transoms, accessed from the adjacent surface parking area. Secondary entrances are located along the south façade, and consist of fully-glazed aluminum storefront doors accessed via a brick paver path through the small surface parking area and veranda.

(b) 1006 Seward Street

1006 Seward Street is located at the northwest corner of the Project Site, abutting 1000 Seward Street. The one-story commercial vernacular building with Streamline Moderne elements is set flush with the sidewalk. The building has a roughly rectangular plan, simple massing, and symmetrical composition. There is a combination roof with

shaped parapet with zig-zag ornamentation, built-up roofing, and composition shingle roofing. Exterior walls are clad in cement plaster with a brick veneer water table. There is a clock at the center of the parapet on the west façade, with neon signage around the perimeter with the tenant's name. Fenestration consists of wood frame fixed windows with projecting fabric awnings. The primary entrance is recessed at the center of the west façade, and consists of a single fully-glazed wood door with a full-height sidelight. There is a wall sign above the primary entrance with the tenant's name.

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

The Historic Report included in Appendix C of this Draft EIR includes a detailed description of the historical background and context of the Project Site and surrounding area. Below is a summary of the discussion included in the Historic Report.

(a) Hollywood Community Plan Area

As previously discussed, the Project Site is located in the Hollywood Community Plan area of the City. Hollywood began as a small agricultural community in the nineteenth century. Farmers experimented in cultivating a wide variety of exotic fruits, vegetables, and flowers. The agricultural character of the community changed in the early twentieth century as large real estate tracts were developed, transforming the community into a bustling suburb of the City.

The most significant factor in the development of Hollywood in the twentieth century was the entertainment industry. Film production began in Hollywood in 1911, and quickly grew into a significant economic force. As the popularity of motion pictures grew, more physical facilities related to motion picture production were constructed in Hollywood and in 1912, the first studio was established. Within months other studios established a presence in Hollywood. Related industries and commercial enterprises serving the motion picture industry were quickly established adjacent to the motion picture studios throughout Hollywood. Much of this development occurred within or immediately adjacent to previously established residential areas.

From the 1910s and into the 1930s, Hollywood experienced tremendous population growth. The rapidly expanding film business attracted migrants from around the United States and around the globe. As a result, there was a sharp increase in residential development. Concentrations of residential properties from this period are located adjacent to the major motion picture studios and include modest single-family residences along with a wide variety of multi-family housing types.

Density in Hollywood increased substantially following World War II. By the 1950s, entertainment industry-related properties began to spread out throughout the greater Los Angeles area, and the major industry in Hollywood shifted to tourism. During the late 1950s the Hollywood Walk of Fame was created on Hollywood Boulevard as a tribute to actors, directors, and other contributors to the entertainment industry. Hollywood's population became more ethnically diverse in the 1960s to 1970s, as new immigrant groups began settling in the area and community and residential densities continued to increase, as original single-family houses, bungalow courts, and smaller apartment buildings were replaced with larger multi-family residential complexes.

By the 1980s the Hollywood community was in a state of economic decline; the Community Redevelopment Agency of Los Angeles established the Hollywood Redevelopment Project Area in 1986 to encourage development in the area. Among the goals of the agency were to revitalize the historic core and preserve historically significant buildings.

By the start of the new millennium, Hollywood began to experience a resurgence that continues today. The establishment of the city's Adaptive Reuse ordinance greatly facilitated the reuse of under-utilized historic buildings into new housing. New, large-scale mixed-use projects as well as the B (Red) Line subway helped to revitalize Hollywood's streets and its economy, bringing with it an influx of new residents and tourists, higher rents, and new development pressures.

(b) Project Site

As described in the Historic Report, the Project Site contains five lots located on the west side of Seward Street, between Romaine Street and Santa Monica Boulevard, and the north side of Romaine Street between Seward Street and North Hudson Avenue.

By 1919, four of the five lots that comprise the Project Site were undeveloped. The parcel at 1007 North Hudson Avenue, located at the east side of the Project Site, was occupied by a one-story, single-family residence, which had been constructed prior to 1914. The surrounding area was not yet fully built out and development generally consisted of single-family residences or duplexes. In December 1920, a four-room, one-story single-family residence was constructed at 1006 Seward Street and in June 1937, a café building was added at the front of the residence. In September 1937, a one-story office building was constructed at 1000 Seward Street.

By 1950, the Project Site was fully developed. A one-story restaurant building located at 1006 Seward Street; a radio equipment warehouse and laboratory located at 1000 Seward Street; and five one-story single-family residences and three detached single-car garages located at the east side of the Project Site. Additionally, by this point,

the surrounding area was fully developed with largely single-family residences or duplexes; commercial uses lined Santa Monica Boulevard.

In 1955, a small one-story building had been added at the rear of the restaurant building on the Project Site. The surrounding area remained developed with single- and multi-family residences with a commercial corridor along Santa Monica Boulevard. In addition, some film-related businesses and other commercial uses had begun to redevelop property along Seward Street south of the Project Site. In April 1959, lots 13, 15, and 16 of White and Newby's Hollywood Boulevard Tract were tied. In June 1959, an addition was made to northwest corner of the building at 1000 Seward Street.

In the latter half of the 20th century, many residences and commercial buildings in the area surrounding the Project Site were demolished and replaced with surface parking areas. The area immediately surrounding the Project Site began to see renewed development beginning in 2000, and older buildings and surface parking areas were replaced with mid-rise commercial buildings and associated parking structures. Since 2014, the intersection of Romaine and Seward Streets has been the site of significant new development, including a commercial building and parking structure at the southwest corner of the intersection, and a commercial building at the northwest corner of the intersection. In 2020, a parking structure was constructed immediately north of the Project Site.

(c) Building Architecture

(i) Related Architectural Styles

Streamline Moderne Architecture

As previously discussed, the southwest wing of the building at 1000 Seward Street was designed in the Streamline Moderne style, and the building at 1006 Seward Street exhibits features of Streamline Moderne architecture.

Characterized by smooth surfaces, curved corners, and sweeping horizontal lines, Streamline Moderne is considered to be the first thoroughly modern architectural style to achieve wide acceptance among the American public. Inspired by the industrial designs of the period, Streamline Moderne was popular throughout the United States in the late 1930s and unlike the equally modern but highly ornamental Art Deco style of the late 1920s, the style was perceived as expressing an austerity more appropriate for Great Depression-era architecture. Raymond Loewy, Walter Dorwin Teague, Gilbert Rohde, and Norman Bel Geddes, the prime movers behind the style, all disliked Art Deco, seeing it as falsely modern.

The origins of the Streamline Moderne are rooted in transportation design, which took the curved form of the teardrop, because it was the most efficient shape in lowering the wind resistance of an object. Product designers and architects who wanted to express efficiency borrowed the streamlined shape of cars, planes, trains, and ocean liners. Since there was little labor-intensive ornament like terra cotta; exteriors tended to be concrete or plaster, the style was inexpensive to build. The 1939–40 New York World’s Fair’s “World of Tomorrow,” believed to be the style’s finest hour, showcased the cars and cities of the future, a robot, a microwave oven, and a television, all in streamlined pavilions. Although the style was popular throughout Southern California during the 1930s, there are relatively few examples simply because there was so little construction activity during the Great Depression era.

Character defining features of Streamline Moderne architecture include:

- Horizontal emphasis
- Asymmetrical façade
- Flat roof with coping
- Smooth plaster wall surfaces
- Curved end walls and corners
- Glass block and porthole windows
- Flat canopy over entrances
- Fluted or reeded moldings or stringcourses
- Pipe railings along exterior staircases and balconies
- Steel sash windows

(ii) Related Architects/Builders

Marshall P. Wilkinson

Marshall Phillips Wilkinson designed the building at 1000 Seward Street in 1937, and designed an addition to the building in 1957. Born on August 29, 1892, Wilkinson worked his way up from a draftsman to contractor to architect over the course of a career spanning at least three decades. Wilkinson first appeared as a draftsman in the 1915 city directory and in 1917, he was a superintendent of construction for the Frank P. Meline Company, which would achieve fame as builder of upscale suburbs and subdivisions throughout Southern California. By 1920, Wilkinson had opened his own office on

Hollywood Boulevard, providing design, construction, and engineering services and by 1922, he had numerous projects to his credit, including four residences in Beverly Hills and an apartment building at the corner of Hobart Avenue and Sunset Boulevard in Hollywood. His practice was diverse, encompassing not only single and multi-family residential properties but also commercial and industrial buildings, the latter primarily for motion picture-related facilities. By 1933, newspaper articles about Wilkinson's projects had begun referring to him exclusively as "architect" and in some cases his designs were constructed by others, including the C.C. Langevin Company building at 1000 Seward Street on the Project Site.

Like most architects of the period, Wilkinson was adept in several architectural styles, including Spanish Colonial Revival (El Encanto Apartments, Palm Springs, 1929), Colonial Revival (803 North Alpine Dr., Beverly Hills, 1930), French Revival (620 North Sierra Dr., Beverly Hills), and Art Deco (714 North Melrose Ave., Los Angeles). His work was covered several times in the Los Angeles Times, as well as published in Architectural Record and Architectural Digest. Wilkinson continued to practice into the 1940s and was joined by his son, Marshall P. Wilkinson, Jr., also an architect. Marshall P. Wilkinson died on September 6, 1969, at the age of 77. Though Wilkinson designed a number of buildings across Southern California from 1920 through the post-World War II period, his work is not widely known, and he is not generally considered a master architect.²⁶

F.D. Harrington

Frank Donald Harrington designed the building at 1006 Seward Street in 1937. Born in in April 1888, Harrington received his education at the Université de Besancon in France, from which he graduated in 1920; and at the University of Southern California, from which he graduated in 1926. Harrington worked as a draftsman for Scott Quintin from 1917 to 1918, and for H.H. Whiteley from 1920 to 1922. He then established a solo practice, and began a career largely focused on ecclesiastical architecture in San Diego. Harrington died in 1976, at the age of 88. Harrington's work is not widely known, and he is not considered a master architect.

(3) Previous Evaluations/Designations

As previously discussed, the Project Site is located in the Hollywood Community Plan area, which was surveyed for historic resources in August 2011 and updated in November 2015. As discussed in the Historic Report, 1000 Seward Street was not

²⁶ *In National Register Bulletin 15, 20, the National Park Service defines a master architect as "a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality."*

identified as potentially significant by SurveyLA; however, 1006 Seward Street and the Entrainment Industry Support Services Planning District were evaluated for potential historical significance in SurveyLA. The survey findings are summarized below:

(a) 1006 North Seward Street

As described in the Historic Report, the building at 1006 North Seward Street was individually evaluated for potential historical significance in SurveyLA based on a potential association with the original Hollywood Canteen, which was a World War II-era restaurant and nightclub that catered to military servicemen. Founded by Hollywood actors Bette Davis and John Garfield, the Canteen was staffed completely by volunteers from the entertainment industry. The Hollywood Canteen was located at 1451 Cahuenga Boulevard and operated from 1942 to 1945. However, as discussed in the Historic Report, the former restaurant/nightclub on the Project Site was re-using the name of the famous venue and had no association with the original Hollywood Canteen. This establishment is no longer operating on the Project Site. Therefore, the Historic Report concluded that the building does not appear eligible for listing.

(b) Entertainment Industry Support Services Planning District

The parcels that comprise the Project Site are partially located within the Entertainment Industry Support Services Planning District, which was identified as a potential planning district by SurveyLA. The Entertainment Industry Support Services Planning District coincides with a large industrially zoned area oriented around the intersection of Santa Monica Boulevard and Highland Avenue in Hollywood. The area has an irregular boundary and is bordered generally by Formosa Avenue to the west, Lexington Avenue to the north, Lillian Way to the east, and Melrose Avenue to the south. The potential planning district contains over 750 buildings and is situated adjacent to several early motion picture studios in the heart of Hollywood. The Entertainment Industry Support Services Planning District contains the most significant collection of entertainment industry-related support services buildings in Hollywood. The potential planning district is not considered a historic resource as defined by CEQA and therefore there are no potential impacts to the planning district.

(4) Resources Located in the Near Vicinity of the Project

As shown in Figure IV.B-1 on page IV.B-25, there are two potential historic resources in the immediate vicinity of the Project Site that should be considered as part of the review of the potential impacts of the Project. These two resources are described below.

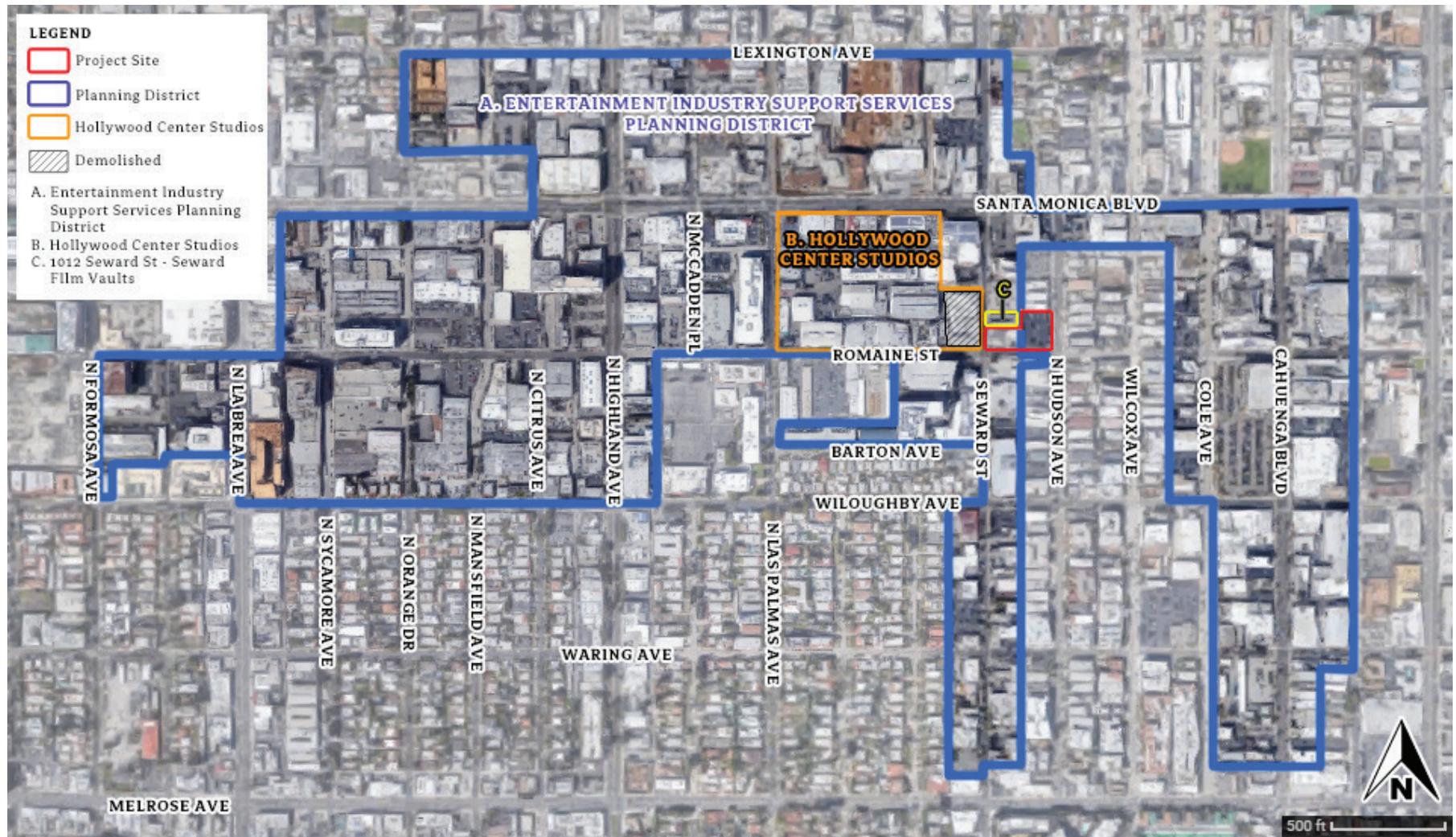


Figure IV.B-1
 Historic Resources in the Project Vicinity

(a) Hollywood Center Studios

The Hollywood Center Studios campus (now called Sunset Las Palmas Studios) is a studio facility located at 1040 Las Palmas Avenue composed of multiple structures on a large superblock. The campus comprises a variety of building types, including offices, soundstages, construction facilities and prop storage; surface parking; high perimeter walls and fences; and restricted access at secure entry points. The campus was identified in SurveyLA as eligible for listing as a historic district in the National Register, California Register, and as a City HCM as an excellent example of an independent/rental studio in Hollywood. Because it was identified as eligible for listing as a historic resource through survey evaluation, the Hollywood Center Studios campus is treated herein as a historic resource for the purposes of CEQA.²⁷ The studio campus is the subject of ongoing upgrades, including a new five-story, 128,000 square foot office building at the northwest corner of Seward and Romaine Streets, completed in 2020.²⁸

(b) Seward Film Vaults

The Seward Film Vaults at 1012 Seward Street are located directly north of the Project Site. The property was identified by SurveyLA as eligible for listing in the National Register, California Register, and as a City HCM as an excellent and very rare example of a 1950s purpose-built film vault in the entertainment industry support services area of Hollywood. Since that time, a project has been completed that has demolished all but the southwest corner of the Seward Film Vaults building and constructed a new 64-foot tall parking structure on the southern portion site. Because it was identified as eligible for listing as a historic resource through survey evaluation, the Seward Film Vaults are treated herein as a historic resource for the purposes of CEQA.

(5) Evaluation of Properties Located On the Project Site*(a) 1000 Seward Street*

The following considers the building located at 1000 Seward Street for eligibility for listing in the National Register, California Register, and as a City HCM:

- Criterion A/1/1 (associated with events or patterns of development): As detailed in the Historic Report, the building at 1000 Seward Street was not identified as

²⁷ *The Hollywood Center Studios Building at 1021 Seward Street (located on the Hollywood Center campus) was identified as individually significant by SurveyLA. However, since that time the building has been demolished and a new five-story commercial building is on the site.*

²⁸ *Sharp, Steven, "New Offices Completed at Sunset Las Palmas Studios," Urbanize Los Angeles, November 17, 2020.*

potentially significant for an association with the entertainment industry or under any commercial development theme by SurveyLA. The building was constructed as office space for the C.C. Langevin Company and other manufacturers and vendors of radio parts and services in 1937 and expanded 20 years later by the same company. Properties that are significant for an association with the radio industry were specifically constructed as a radio broadcast facility and used for radio production for an extended period of time; industrial or office buildings associated with the manufacture of component parts are not eligible for an association with the radio industry. As concluded in the Historic Report, there is no evidence that the property was ever the site of radio broadcasting operations. Therefore, it does not meet eligibility standards for an association with the radio industry in the City.

Additionally, the building is not significant for its association with the C.C. Langevin Company as it was not the first or most important location of the C.C. Langevin Company; rather, it was a regional office for the company, which was originally established in San Francisco in 1925, and expanded throughout the west and southwest in the 1930s. No evidence was found to suggest that the company made significant contributions to commercial development in the City, or that it was significant in commercial history in California or the United States.

Although the Project Site is located in proximity to several motion picture studios, there is no evidence that this building had a direct association with the entertainment industry. In addition, the early commercial development of the Hollywood Community Plan area predated the construction of this building by several decades; it therefore does not represent significant early commercial development in the area, and it does not represent a significant commercial trend, pattern of development, or property type.

Therefore, the building at 1000 Seward Street is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City HCM under Criterion A/1/1.

- Criterion B/2/2 (association with important people): No documentation was found to suggest that the original owner of the building (C.C. Langevin Company) rose to prominence in its group or made significant contributions to growth or development in the City while occupying the building. In addition, no evidence was found to suggest that other owners or occupants of the building, including General Radio Company, World Broadcasting System, Inc., or Telescopes, rose to prominence in its group or made significant contributions to growth or development in the City while occupying the building. Therefore, the office building is not eligible for designation under Criterion B/2/2.
- Criterion C/3/3 (architectural merit): The building at 1000 Seward Street was not identified as a significant example of Streamline Moderne architecture by SurveyLA. It exhibits several character-defining features of the style, including the horizontal orientation, rounded corner, flat roof with parapet, horizontal

speedlines, and divided-light steel sash awning windows. However, it does not represent an excellent example of the style, and it does not exhibit quality of design through distinctive features. The building does not rise to the level of architectural distinction of other examples of the style in the City. Furthermore, it has been altered over time, including the replacement of the primary entry door, the sandblasting of the masonry surfaces, the enclosure of a large opening at the east side of the south façade, and a large addition on the northeast corner which is not compatible in style or design with the original building. Although the addition was designed by the same architect as the original building, it is entirely different in architectural character. The addition is largely utilitarian in nature, with minimal Mid-century Modern design details, including a breeze block screen wall at the south façade. The addition presents as an entirely different structure than the original building, with no apparent correlation between the design of the two portions.

As previously discussed, the building was designed by Marshall P. Wilkinson in the Streamline Moderne style in 1937. Wilkinson designed a number of buildings across Southern California from 1920 through the post–World War II period; however, his work is not widely known, and he is not generally considered a master architect.

As such, the building at 1000 Seward Street does not meet the eligibility standards for Streamline Moderne architecture, and it does not represent the work of a master architect. Therefore, it is not eligible for designation under Criterion C/3/3.

In summary, the building at 1000 Seward Street is not eligible for listing in the National Register, California Register, or as a City HCM under any of the three criteria.

(b) 1006 Seward Street

The following considers the building located at 1006 Seward Street for eligibility for listing in the National Register, California Register, and as a City HCM:

- Criterion A/1/1 (associated with events or patterns of development): At the time that this area was surveyed by SurveyLA, 1006 Seward Street was a restaurant operating under the name Hollywood Canteen. As previously discussed, the original Hollywood Canteen was a World War II–era restaurant and nightclub that catered to military servicemen and was founded by Hollywood actors Bette Davis and John Garfield. The original Hollywood Canteen was located at 1451 Cahuenga Boulevard and operated from 1942 to 1945. From 1991 to 2011, a restaurant called the Hollywood Canteen operated at 1006 Seward Street. However, research conducted for SurveyLA indicated that this restaurant/nightclub re-used the name of the famous venue but was not associated with the original Hollywood Canteen. This was corroborated by additional research conducted for this study, including a review of newspapers

and city directories to confirm that the building at 1006 Seward Street was not the original location of, or otherwise historically associated with, the Hollywood Canteen. As noted in SurveyLA, the original Hollywood Canteen was located in a former livery stable at 1451 Cahuenga Boulevard and operated from 1942 to 1945. Based on city directories and newspaper advertisements, 1006 Seward Street was the location of a business called the Hollywood Canteen from approximately 1991 to 2011, nearly fifty years after the original Hollywood Canteen closed for business. No evidence was found to suggest that the Hollywood Canteen at 1006 Seward Street was in any way related to the original Hollywood Canteen. The establishment is no longer operating at the Project Site.

The building was initially developed with a single-family residence in 1920 and in 1937, a café building was added at the front of the residence. From the late 1930s through the 1980s, the property operated as a series of cafes/restaurants and by 1960, there were no longer any residences on the Project Site. No evidence was found that any of the businesses had a significant association with the entertainment industry or contributed to the Hollywood “social scene” as documented in the SurveyLA Entertainment Industry Historic Context. In addition, it was not the long-term home of a local restaurant that may have made a significant contribution to the commercial history of the City; it does not represent a significant trend in commercial development; and there is no evidence that an important event took place on the Project Site.

Therefore, the building at 1006 Seward Street is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City HCM under Criterion A/1/1.

- Criterion B/2/2 (association with important people): No documentation was found to suggest that the original owner of the residence at 1006 Seward Street (Samuel B. Brodhead), the original owner of the café at 1006 Seward Street (Dick King), or any subsequent owner or occupant of the building rose to prominence in their profession, or made significant contributions to growth or development in the City while occupying the building. Therefore, the restaurant building is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City HCM under Criterion B/2/2.
- Criterion C/3/3 (architectural merit): The restaurant building was added to an existing single-family residence in 1937. It is commercial vernacular in design with applied Streamline Moderne detailing at the primary façade. The one-story building fills its narrow rectangular parcel and is of a scale typical of neighborhood eating establishments and exhibits architectural features that reflect trends in neighborhood commercial designs. However, it is largely utilitarian in nature, with minimal Streamline Moderne design details, including the horizontal orientation, smooth stucco cladding, and geometric ornamentation at the primary façade. It is not an excellent example of the style, and it does not exhibit quality of design through distinctive features.

Architect F.D. Harrington designed the café addition to the building in 1937. Harrington's career spanned from approximately 1926 through the 1970s and was largely focused on ecclesiastical architecture in the San Diego area. His work is not widely known, and he is not considered a master architect. The restaurant building does not represent an excellent example of its style or type, and it does not exhibit quality of design through distinctive features.

Therefore, 1006 Seward Street is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City HCM for its architectural merit under Criterion C/3/3.

In summary, the building at 1006 Seward Street is not eligible for listing in the National Register, California Register, or as a City HCM under any of the three criteria.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to cultural resources if it would:

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

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

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

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

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

(2) Historic Resources

If the project would result in a substantial adverse change in the significance of an 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; 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 historic resource is a project that may have a significant effect on the environment.²⁹ A substantial adverse change in the significance of an historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.³⁰

b. Methodology

The Historic 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’s inventory of historic properties to identify any previously recorded properties within or near the Project Site. 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.

²⁹ CEQA Guidelines, Section 15064.5(b).

³⁰ CEQA Guidelines, Section 15064.5(b)(1).

d. Analysis of Project Impacts

Threshold (a): Would the project cause a substantial adverse change in the significance of a historic resource as defined in Section 15064.5.

(1) Impact Analysis

(a) Direct Impacts

As detailed in the Historic Report and summarized above in Subsection 2.b.(5), the buildings on the Project Site were evaluated for historic and architectural significance. The two commercial buildings on the Project Site were not identified as significant by SurveyLA. They were re-evaluated as part of the Historic Report, which confirmed the survey finding that neither building is eligible for listing at the federal, State, or local levels. In addition, they do not contribute to an eligible historic district. **Therefore, since there are no historic resources on the Project Site, the demolition required for the Project would not result in significant direct impacts to historic resources.**

(b) Indirect Impacts

The Project would add height and massing on a lot that is currently developed with two low-scale commercial buildings and a surface parking lot, altering the surroundings of the immediately adjacent historic resources (i.e., Hollywood Center Studios and the Seward Film Vaults). Potential impacts to these resources are analyzed below.

(i) Hollywood Center Studios

Hollywood Center Studios (now Sunset Las Palmas Studios) is located west of the Project Site, across Seward Street. Hollywood Center Studios is a self-contained studio facility composed of multiple structures on a large superblock. The plant contains a variety of building types, including offices, soundstages, construction facilities, and prop storage; surface parking; high perimeter walls and fences; and restricted access at secure entry points. The Project does not include the demolition, relocation, rehabilitation, alteration, or conversion of any portion of the Hollywood Center Studios campus, which will remain unchanged and in its original location after the implementation of the Project. As such, the Project would not result in direct adverse impacts to the Hollywood Center Studios campus.

As discussed in the Historic Report, the Project Site is located directly east of Hollywood Center Studios but there is adequate separation between the proposed new construction and the studio campus. The Project Site is separated from Hollywood Center Studios by Seward Street, which is approximately 28 feet wide. The new office building on the Hollywood Center Studios campus would further buffer the historic buildings on the campus from the Project Site. Hollywood Center Studios is a self-contained, enclosed

facility with an inward focus typical of historic studios, intended to maintain privacy for the activities going on within the studio lot. It is significant as a potential historic district, representing a collection of property types that collectively comprise a historic independent/rental studio in Hollywood. However, there are no significant architectural or visual characteristics that are expressed on the street-facing facades that are intrinsic to conveying the significance of the district and therefore could be impacted by adjacent new construction. Due to the nature of the studio lot, views from surrounding streets do not represent a significant character-defining feature, and changes to views of the studio lot from surrounding streets would therefore not impair the significance of the district or any of its important features. Alterations to the setting surrounding the studio campus, including the introduction of additional height and density on adjacent lots, would not constitute a significant visual impact that would impair Hollywood Center Studios' ability to convey significance.

Therefore, the proposed new construction will not obscure important character-defining features of Hollywood Center Studios, including views of its primary entrance on Las Palmas Avenue, which will remain unobstructed after implementation of the Project. All buildings and features of the Hollywood Center Studios campus would remain intact in their current locations and would not be materially altered by new construction to the east. The existing physical elements that characterize Hollywood Center Studios would remain intact and continue to convey the property's historic significance as an independent/rental studio in Hollywood. **Therefore, the Project would not result in indirect adverse impacts to the Hollywood Center Studios campus.**

(ii) Seward Film Vaults

As discussed in the Historic Report, the Project Site is located immediately south of the Seward Film Vaults, which is a two-story commercial vernacular building of brick masonry construction. It has a flat roof with parapet and built-up roofing, and exterior walls are expressed masonry and access to individual film vaults is via steel doors lining an exterior corridor with metal pipe railings at the north façade. The property containing the Seward Film Vaults is located to the north of the Project Site. The Seward Film Vaults have been demolished during the construction of a new 64-foot tall parking structure. The introduction of additional height and massing on the Project Site will not materially alter the Seward Film Vaults. The remaining historic portion of the Seward Film Vaults would remain at their original location and would retain the existing physical elements that characterize a 1950s film vault. **However, due to the proximity of the new construction to the film vaults, including excavation for four levels of subterranean parking, the Project does have the potential to impact the structural integrity of the adjacent Seward Film Vaults during excavation and construction procedures which would be a significant impact. Therefore, impacts would be significant prior to mitigation.**

(2) Mitigation Measures

The following mitigation measure is proposed with respect to potential Project impacts to the Seward Film Vaults:

Mitigation Measure CUL-MM-1: Prior to construction, the Project shall include a shoring plan prepared by a qualified structural engineer to ensure the protection of the Seward Film Vaults during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have demonstrated experience specific to rehabilitating historic buildings and applying the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings to such projects. The lead agency shall determine qualification prior to any work being performed. The qualified structural engineer shall submit the shoring plan to the City, establishing baseline conditions to be monitored during construction, prior to issuance of any building permit for the Project.

(3) Level of Significance After Mitigation

Pursuant to Mitigation Measure CUL-MM-1 above, the Project will include a shoring plan prepared by a qualified structural engineer who meets the relevant Secretary of the Interior's Professional Qualifications Standards, for review and approval by the City of Los Angeles prior to issuance of a grading permit. Implementation of the shoring plan would ensure Project construction would not affect the structural integrity of the Seward Film Vaults. The existing physical elements that characterize the Seward Film Vaults would remain intact and continue to convey the property's historic significance as a rare remaining example of a film vault in Hollywood. Therefore, with implementation of Mitigation Measure CUL-MM-1 indirect impacts to the historic resources would be less than significant.

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

As discussed in Section VI, Other CEQA Considerations, and evaluated in the Initial Study included as Appendix A of this Draft EIR, the Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Furthermore, as discussed above, the results of the confidential cultural resources records search indicate no archeological resources have been recorded

within 0.5 mile of the Project Site. Nevertheless, the Project would require grading, excavation, and other construction activities to a depth of 45 feet that could have the potential to disturb existing but undiscovered archaeological resources. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources.

To this end, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archaeological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified archaeologist to assess the find. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. **Overall, 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 dedicated cemeteries.

As discussed in Section VI, Other CEQA Considerations, and evaluated in the Initial Study included as Appendix A of this Draft EIR, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other relevant entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC 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 most likely descended from the deceased Native American. 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. **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 16 specific related projects in the Project Site vicinity, as well as Related Project No. 17, the Hollywood Community Plan Update. Collectively, the related projects involve a variety of residential uses (i.e., apartments), 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 and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As discussed above, there are no historic resources located on the Project Site; therefore the Project would not result in direct impacts to historic resources. However, there are identified historic resources in the Project vicinity, including the Hollywood Center Studios which is located immediately to the west of the Project Site, and the Seward Film Vaults immediately to the north. Although the Project would introduce increased height and density to the Project Site, the Project does not include demolition, destruction, relocation, or alteration of any potential historic resource or its immediate surroundings such that the significance of a historic resource would be materially impaired. As discussed above, with the implementation of Mitigation Measure CUL-MM-1, the Project would not result in indirect impacts to historic resources located adjacent to the Site. **Therefore, with implementation of Mitigation Measure CUL-MM-1, the Project's impact on historic resources would not be cumulatively considerable, and the cumulative impact would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to historical would be less than significant with the implementation of Mitigation Measure CUL-MM-1.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to historical resources would be less than significant with mitigation.