

D-2 Historical Resources Assessment Peer Review Memorandum

6220 WEST YUCCA STREET HISTORICAL RESOURCES PEER REVIEW REPORT

PREPARED FOR:

Department of City Planning, City of Los Angeles
221 N. Figueroa Street, 13th Fl.
Los Angeles, CA 90012
Attention: Adam Villani

PREPARED BY:

ICF
555 W. 5th Street, Suite 3100
Los Angeles, CA 90013
Contact: Colleen Davis
213.312.1759

August 2019



Colleen Davis, 2019. *6220 West Yucca Street Historical Resources Peer Review Report*. August (ICF 00358.19) Los Angeles, CA. Prepared for Department of City Planning, City of Los Angeles, Los Angeles, CA.

Executive Summary

This independent historical resources peer review report analyzes the conclusions provided in the *Historical Resources Assessment and Environmental Impacts Analysis* prepared by Environmental Science Associates (ESA) in August 2019 (ESA 2019). ESA 2019 analyzes the potential for impacts under the California Environmental Quality Act (CEQA) on built environment historical resources resulting from the proposed development of the 6220 West Yucca Street project in the Hollywood area of Los Angeles, California (Project). The proposed Project involves demolition of a multi-family residential complex, two single-family residences, and outbuildings associated with those three buildings. It additionally involves construction of two new buildings featuring residential, hotel, and restaurant uses with a total square footage of approximately 316,948 square feet.

This analysis provides a full, independent historical significance evaluation of the three buildings proposed for demolition and an analysis of projected impacts under CEQA related to implementation of the proposed Project. It also evaluates the implications of the proposed Project on the California Register of Historical Resources (CRHR)-listed Vista del Mar/Carlos Historic District (District), a collection of residential buildings primarily designed in the Craftsman style with a period of significance spanning from 1910 to 1923. Where appropriate, this analysis incorporates by reference the research conducted and historic context developed in conjunction with ESA 2019.

ESA 2019 concluded that the two single-family residences that would be demolished by the proposed Project, 1771 and 1765 Vista del Mar Avenue, *are not individually eligible* for listing in the National Register of Historic Places (NRHP) or CRHR, nor do they qualify as Historic-Cultural Monuments (HCMs), which aligns with all identified prior analyses of the two structures, which only identified the structures as contributors and not individually eligible resources. *ICF's independent analysis reaches the same conclusion.*

ESA 2019 additionally noted that, according to the State of California Historical Resources Inventory, 1771 and 1765 Vista del Mar Avenue are identified as contributors to the District, which was listed in the CRHR in 1994. The CRHR listing of the District occurred automatically when the State Historic Preservation Officer (SHPO) formally concurred that the District was eligible for listing in the NRHP with 16 contributors, including 1771 and 1765 Vista del Mar Avenue. Based upon the CRHR listing, the District and the two contributors directly affected by the proposed Project are considered presumptive historical resources under CEQA.

Over 20 years have passed since the District's CRHR listing. ESA 2019 re-evaluated the listing in relation to 1771 and 1765 Vista del Mar Avenue to determine whether any changes have occurred or if additional information either not considered or not given sufficient weight existed that would affect the 1994 CRHR and SHPO determination. ESA 2019 confirmed that, overall, the District retains sufficient integrity to convey its significance. ESA 2019 further concluded, based on substantial evidence, that the two contributors directly affected by the proposed Project have been extensively altered such that they do not retain integrity sufficient to convey the significance of the District's 1910–1923 period of significance. *ESA 2019 concluded that 1771 and 1765 Vista del Mar are neither appropriately classified as District contributors nor considered CEQA historical resources. ICF's independent analysis reaches the same conclusion.*

Due to their location at the District's northern edge, the appropriate classification of 1771 and 1765 Vista del Mar as non-contributors does not affect the District's overall eligibility. Primarily expressive of the Craftsman style, the District's most intact contributors form a cohesive and contiguous grouping centered on the intersection of Carlos and Vista del Mar Avenues one block south of the location of 1771 and 1765 Vista del Mar. The District remains eligible even with the re-classification of 1771 and 1765 Vista del Mar Avenue as non-contributors because it retains a stylistically unified, intact grouping at its geographic core. Based on the appropriate classification of these resources as non-contributors arranged at the District's northern periphery, ESA 2019 opined that *demolition of 1771 and 1765 Vista del Mar would not result in a significant impact on the District under CEQA. ICF independently verifies this conclusion as correct and appropriate.*

Finally, although construction of the proposed Project consisting of two new buildings along Yucca Street between Argyle Avenue and Vista del Mar Avenue would alter the District's setting, this alteration would not be so extensive as to prevent it from conveying its significance. ESA 2019, therefore, determined that *construction and operation of the proposed Project would not result in a significant impact on the District. ICF affirms this conclusion.*

ESA 2019 also concluded that the multi-family apartment complex, Yucca Argyle Apartments, directly affected by the proposed Project *is not individually eligible for listing* in the NRHP or the CRHR, nor as a contributor to a historic district. ESA 2019 additionally concluded that Yucca Argyle Apartments qualifies neither as a City of Los Angeles HCM nor as a contributor to a Historic Preservation Overlay Zone (HPOZ). It is not a historical resource for the purposes of CEQA. No impact, therefore, would result from its demolition. *ICF's independent analysis affirms these conclusions.*

Contents

List of Tables.....	iv
List of Figures.....	iv
List of Acronyms and Abbreviations.....	v

	Page
Executive Summary.....	i
Chapter 1 Introduction.....	1-1
1.1 Project Background.....	1-1
1.1.1 Project Location	1-1
1.1.2 Project Description	1-1
1.1.3 Current Setting.....	1-2
1.2 Regulatory Framework	1-3
Chapter 2 Methods	2-1
2.1 SurveyLA	2-1
2.2 Research Methods	2-1
2.3 Field Methods	2-2
Chapter 3 Assessment of Significance and Eligibility	3-1
3.1 Historic Context	3-1
3.2 Resources Directly Affected by Proposed Project	3-1
3.2.1 Vista del Mar/Carlos Historic District.....	3-1
3.2.2 1771 Vista del Mar Avenue.....	3-3
3.2.3 1765 Vista del Mar Avenue.....	3-7
3.2.1 Yucca Argyle Apartments/6210–6224 West Yucca Street and 1756–1760 Argyle Avenue	3-11
Chapter 4 Impacts Analysis.....	4-1
Chapter 5 Conclusion	5-1

Appendices

Appendix A	Resume of Author
------------	------------------

Tables

Table		Page
1	Direct Impact Potential from Construction.....	5-1
2	Indirect Impact Potential from Operation.....	5-1

Figures

Figure		Page
1	Rendering of Proposed Project.....	1-2
2	1771 Vista del Mar Avenue, east elevation, view west.....	3-3
3	1771 Vista del Mar Avenue, south and east elevations, view northwest	3-4
4	1771 Vista del Mar Avenue, north and east elevations, view southwest	3-5
5	1765 Vista del Mar Avenue, east elevation, view west.....	3-7
6	1765 Vista del Mar Avenue, north and east elevation, view southwest.....	3-8
7	1765 Vista del Mar Avenue, east and south elevations, view northwest	3-9
8	Yucca Argyle Apartments, 6210–6224 W. Yucca Street, north elevation, view southwest.....	3-11
9	Yucca Argyle Apartments, 1756–1760 Argyle Avenue, north and west elevations, view southeast	3-12

Acronyms and Abbreviations

CEQA	California Environmental Quality Act
City	city of Los Angeles
CRHR	California Register of Historical Resources
District	Vista del Mar/Carlos Historic District
ESA	Environmental Science Associates
HCM	City of Los Angeles Historic-Cultural Monument
HPOZ	City of Los Angeles Historic Preservation Overlay Zone
NRHP	National Register of Historic Places
PRC	Public Resources Code
Project	6220 West Yucca Street project
SHPO	State Historic Preservation Officer

ICF conducted a historical resources peer review of the technical analysis provided in the *Historical Resources Assessment and Environmental Impacts Analysis* prepared by ESA in August 2019 (ESA 2019) for the proposed Project, located at 6220 West Yucca Street in the Hollywood area of the city of Los Angeles (City).

1.1 Project Background

1.1.1 Project Location

The Project site is located in the Hollywood Community Plan area in the city of Los Angeles. The Project site is rectangular and bounded on the west by Argyle Avenue, on the north by Yucca Street, and on the east by Vista del Mar Avenue. On the south, it borders a large, vacant parcel (site of the no longer extant Little Country Church of Hollywood) adjacent to Argyle Avenue and a small residential parcel facing Vista del Mar Avenue. The site includes a multi-family residential complex, two single-family dwellings with related outbuildings, and a paved, vacant lot currently used for automobile parking.

1.1.2 Project Description

The Project proposes to demolish the multi-family residential complex, two single-family dwellings, and related outbuildings associated with the parcels identified by Assessor's Parcel Numbers 5547-031-007, 5546-031-008, 5546-031-027, and 5546-031-031 and construct two buildings in their place.



Figure 1. Rendering of Proposed Project

The proposed Project, depicted on Figure 1, would include a total of 316,948 square feet of residential and hotel uses. Building 2 would be set at the eastern end of the site, facing Vista del Mar Avenue. It would consist of three stories topped by a hipped roof, containing multi-family residential units. Building 1 would be arranged at the western end of the site and consist of a 17-story L-shaped tower supporting residential/hotel uses. The tower would be set atop a rectangular-plan three-story podium featuring above-ground parking and three subterranean levels of parking.

1.1.3 Current Setting

The area surrounding the Project site is densely developed with a wide variety of building sizes, shapes, uses, and ages. A pair of 1925 multi-family residential low-rise buildings and a 2017 high-rise hotel building are arranged on the north side of Yucca Street, directly across from the Project site. The Gower Street exit ramp from State Highway 101 (Hollywood Freeway) is northeast of the Project site. Several single-family houses that include contributors to the District and a vacant parcel are located on the east side of Vista del Mar Avenue, directly across from the Project site. St. Stephen's Episcopal Church and associated parking are sited due east of the single-family houses and vacant lot. One- and two-story single-family residences, contributors to the District, are arranged along Vista del Mar Avenue south of the Project site. Immediately south of the Project site, facing Argyle Avenue, is a large, vacant parcel that formerly contained the Little Country Church of Hollywood (no longer extant following its destruction by a 2007 fire). On the west side of Argyle Avenue, directly across from the Project site, is a high-rise apartment tower constructed in 2017 with a surface parking lot arranged to its south. North and west of the Project site is a vacant, triangular parcel occupying the middle of a triangular street intersection. A single-story utility

building belonging to the Los Angeles Department of Water and Power sits northwest of the triangular intersection and parcel.

1.2 Regulatory Framework

Federal, state, and local regulations recognize the public's interest in cultural resources and the public benefit of preserving them, including, most notably here, CEQA. Among other things, such laws and regulations require local agencies and development project applicants to consider how development might affect cultural resources and, where necessary to comply with legal requirements, to take steps to avoid or reduce potential damage to them.

The proposed Project is subject to the requirements of CEQA and also may be affected by other state and municipal laws, regulations, and building codes regarding historical resources. These might include the CRHR, the California State Historical Building Code, and City of Los Angeles' HCMs and Historic Preservation Overlay programs. In addition, the City requires that historical resources studies, surveys, and reports, such as this technical report, consider the potential eligibility of properties for listing in the NRHP. Moreover, the appropriate treatment of historic properties at the municipal, state, and federal levels is informed by Standards and Guidelines promulgated by the U.S. Secretary of the Interior.

Federal

National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the NRHP was established by the National Historic Preservation Act of 1966 as "an authoritative guide to be used by federal, state, and local governments; private groups; and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and local levels. Ordinarily, birthplaces, cemeteries, or graves of historical figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; properties primarily commemorative in nature; and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP, unless they satisfy certain conditions.

According to NRHP guidelines, the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess and meet any of the following criteria:

- A property is associated with events that have made a significant contribution to the broad patterns of our history.
- A property is associated with the lives of persons significant in our past.
- A property embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.
- A property yields, or may be likely to yield, information important in prehistory or history.

The NRHP requires that a resource must not only meet one of these criteria, but also possess *integrity*, defined as the ability of a property to convey historical significance. The evaluation of a resource's integrity must be grounded in an understanding of that resource's physical characteristics and how those characteristics relate to its significance. The NRHP recognizes seven aspects or qualities that, in various combinations, define the integrity of a property: location, design, setting, materials, workmanship, feeling, and association.

A property listed in or formally determined eligible for listing in the NRHP is automatically included in the CRHR and is, therefore, a historical resource for the purposes of CEQA.

Secretary of the Interior Standards for the Treatment of Historic Properties

In addition to providing criteria for evaluating the historic significance of properties, the Secretary of the Interior has developed Standards for the Treatment of Historic Properties. According to the National Park Service, these standards provide “common sense historic preservation principles” and are presented as “a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations” (National Park Service 2019).¹

There are “four distinct approaches to the treatment of historic properties: preservation, rehabilitation, restoration, and reconstruction.” The selection of a treatment approach “depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation” (National Park Service 2019).² Rehabilitation is the most commonly applied approach and is generally used to guide adaptive reuse projects and new construction adjacent to historic properties.

The Standards for Rehabilitation (36 Code of Federal Regulations, Part 67) 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 historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of the deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

¹ National Park Service. 2019. “The Secretary of the Interior's Standards.” Available: <https://www.nps.gov/tps/standards.htm>. Accessed June 6, 2019.

² *Ibid.*

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. Archaeological 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 a property. The new work will 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 property and its environment would be unimpaired.

State

The State Historic Preservation Officer and the California Register of Historical Resources

The National Historic Preservation Act mandated the selection and appointment in each state of a SHPO. Each SHPO is tasked, among other duties, with maintaining an inventory of historic properties. In California, the state legislature established additional duties for the SHPO, which include the maintenance of the CRHR. Established in 1992 by California Public Resources Code (PRC) Section 5024.1(a), the CRHR serves as “an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent feasible, from substantial adverse change.” According to California PRC Section 5024.1(c), the CRHR criteria broadly mirror those of the NRHP. The CRHR criteria are found in California PRC Section 5024.1(c) and are as follows.

“An historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:

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

The general rule is that a resource must be at least 50 years old to qualify for the CRHR. In addition, the resource must meet one or more of the aforementioned criteria and must possess integrity, defined as “the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” The CRHR recognizes the same characteristics of integrity as the NRHP.

Properties listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

California Environmental Quality Act

Established in 1970, CEQA requires state and local government agencies to analyze and publicly disclose the environmental impacts of proposed development projects carried out by government agencies and private projects subject to discretionary government approvals. CEQA also requires the applicable lead agency to consider and, where feasible, adopt mitigation measures to lessen “significant” impacts on the environment. CEQA requires a lead agency to make two distinct determinations regarding potential impacts on historical resources. First, the lead agency must decide whether a project would affect any CEQA-defined “historical resources.” Second, if there is a historic resource that would be affected, the lead agency must decide if the project’s impacts on the resource would be “significant” (State CEQA Guidelines § 15064.5(a) and (b)).

Section 15064.5(a) of the State CEQA Guidelines at Title 14, Division 6, Chapter 3 of the California Code of Regulations defines “historical resources” as:

1. A resource listed in, or determined eligible by the State Historical Resources Commission for listing in, the CRHR.
2. A resource included in a local register of historical resources or identified as significant in an historical resource survey shall be presumed historically significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if it meets the criteria for listing in the CRHR.

If a lead agency determines that a project will adversely affect a historical resource, then the agency must evaluate whether that impact will result in a substantial adverse change in the significance of that resource (PRC § 21084.1; State CEQA Guidelines § 15064.5(b)). The State CEQA Guidelines define a “substantial adverse change in the significance of a historical resource” to mean “physical demolition, destruction, relocation or alteration of the resource or its immediate surroundings such that the significance of the resource is *materially impaired*” (emphasis added) (State CEQA Guidelines § 15064.5(b)(1)). A substantial adverse change results in a “material impairment” when a project:

- A. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
- B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in an historical resources survey meeting the requirements of PRC Section 5024.1(g), 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. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for

inclusion in the CRHR as determined by a lead agency for purposes of CEQA. (State CEQA Guidelines § 15064.5(b)(2).)

If a project would have a potentially substantial adverse change in the significance of a historical resource, a lead agency must consider whether there is feasible mitigation to reduce any such impacts to a less-than-significant level (State CEQA Guidelines § 15126.4). If such mitigation is not feasible, a lead agency cannot approve a project unless it also adopts a statement of overriding considerations finding, based on substantial evidence, that the economic, legal, social, technological, or other benefits of the project outweigh the unavoidable potential impacts on the historical resource (State CEQA Guidelines § 15093).

Local

The City provides for the protection and preservation of recognized cultural resources, including designated buildings, sites, objects, and districts, through two programs administered by the Los Angeles Department of City Planning. The City designates local landmarks, which it calls HCMs, under Section 22.171 of Article 1, Chapter 9, Division 22 (Cultural Heritage Ordinance) of the Los Angeles Municipal Code, as amended by Ordinance No. 185472 in 2018. The City also recognizes local historic districts, which are referred to as HPOZs, in accordance with Section 12.20.3 of the Los Angeles Municipal Code, as amended in 2017.

Historic-Cultural Monuments

The criteria for designation as an HCM are codified in Chapter 9, Section 22 of the City of Los Angeles Administrative Code. A HCM is any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to the City. Designated resources may include historic structures or sites that:

- Are identified with important events of national, state, or local history, or exemplify significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community;
- Are associated with the lives of historic personages important to national, state, city, or local history; or
- Embody the distinctive characteristics of a style, type, period, or method of construction; or represent a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

HCMs are presumptive historical resources for the purposes of CEQA pursuant to State CEQA Guidelines Section 15064.5(2). Alterations or demolitions to sites that have been designated as HCMs are subject to review by the City of Los Angeles Cultural Heritage Commission.

Historic Preservation Overlay Zones

The procedures for designating an HPOZ are found in Section 12.20.3 of the Los Angeles Municipal Code. HPOZs are presumptive historical resources for the purposes of CEQA pursuant to State CEQA Guidelines Section 15064.5(2). Alterations or demolitions to properties included in an HPOZ are subject to review by the City of Los Angeles Department of City Planning.

An HPOZ requires development of a “context statement supporting a finding establishing the relation between the physical environment of the preservation zone and its history, thereby

allowing the identification of historic features in the area as contributing or non-contributing. The context statement shall represent the history of the area by theme, place, and time. It shall define the various historical factors which shaped the development of the area. It shall define a period of significance for the preservation zone, and relate historic features to that period of significance. It may include, but not be limited to,

- historical activities or events,
- associations with historic personages,
- architectural styles and movements, master architects, designers, building types, building materials, landscape design, or pattern of physical development that influenced the character of the preservation zone at a particular time in history” (City of Los Angeles Ordinance 184903).

Elements identified as contributing to a preservation zone shall qualify under one or more of the following criteria, according to City of Los Angeles Ordinance 184903:

1. *Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or*
2. *Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or city; or*
3. *Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of an historic place or area of historic interest in the City.*

This section describes the research and field methods used to identify and evaluate historical resources in the ESA 2019 study and to assess the Project's possible impacts on identified historical resources.

2.1 SurveyLA

SurveyLA was a citywide historic resource survey that sought to identify and document potential historic resources representing important themes in the City's history in line with the listing criteria of the NRHP, the CRHR, and the HCM. The survey and resource evaluations were completed by consultant teams under the supervision of the City Planning Department Office of Historic Resources, the City's expert historic resources department. SurveyLA's field surveys covered the period from approximately 1850 to 1980 and included individual resources, areas, and districts. Field surveys were conducted from 2010–2017. SurveyLA has published the results of the survey separately for each of the City's 36 Community Plan areas, as well as a variety of guidance documents including historic context statements and methodologies for research and analysis.

2.2 Research Methods

ICF reviewed the research conducted in conjunction with ESA 2019, which included copies of the following research materials:

- 1) Sanborn Fire Insurance maps of the project;
- 2) Los Angeles County Tax Assessor maps;
- 3) Tract maps;
- 4) Records search results from the South Central Coastal Information Center;
- 5) City of Los Angeles building permits;
- 6) 2010 Survey of Hollywood Redevelopment Area on behalf of Los Angeles Community Redevelopment Agency (excerpts); and
- 7) 1984 site record associated with Hollywood Heritage/Community Redevelopment Agency and 1994 site record associated with Federal Emergency Management Agency Section 106 compliance

This analysis incorporates by reference the research conducted in conjunction with ESA 2019.

2.3 Field Methods

On May 11, 2019, ICF's Colleen Davis, who meets the Secretary of the Interior's Professional Qualification Standards for History and Architectural History, conducted a field survey of the Project area. In accordance with industry standard practice, Colleen conducted a pedestrian survey of the Project site and Vista del Mar/Carlos Historic District from the public right-of-way, photographing buildings and streetscapes, observing current conditions, noting alterations, evaluating the resources, and assessing potential impacts on the historical resources identified in ESA 2019 as those that would be directly affected by the proposed Project.

3.1 Historic Context

In accordance with SurveyLA's published methodology, ESA 2019 developed the following historic contexts to provide necessary background for evaluating the resources directly affected by the proposed Project:

- **Streetcar Suburbanization**
 - Hollywood
 - Del Mar Tract
- **American Craftsman Style Architecture**
- **Multi-Family Residential Development: 1950s–1960s Courtyard Apartments**
 - Courtyard Apartments
 - Post-War Multi-Family Residential Architecture

ICF reviewed these contexts and considers them appropriate and adequate for evaluating the subject resources.

The following evaluations incorporate the ESA 2019 historic contexts by reference.

3.2 Resources Directly Affected by Proposed Project

3.2.1 Vista del Mar/Carlos Historic District

Architectural Description and Integrity Summary

ESA 2019 includes a detailed architectural description, photographic documentation, and integrity assessment of the District. ICF has reviewed this information, and finds it to be accurate based on ICF's independent review and assessment, and incorporates ESA 2019 by reference.

The buildings identified as contributors to the District include a collection of early twentieth-century dwellings arranged along two streets set at a right angle forming an "L." Constructed during the period spanning 1910 to 1923, the remaining contributing buildings predominantly embody the Craftsman style. Although the dwellings arranged along Vista del Mar Avenue differ in size, scale, and setback from those arranged along Carlos Avenue, the extant contributing buildings all share noted elements of the Craftsman vernacular, including wood siding, gable roofs, divided light wood sash windows, and decorative structural elements, which unify the remaining contributors that form the District.

Evaluation of Significance

Based on research and context developed in ESA 2019, the following provides ICF's independent professional assessment of the District under NRHP, CRHR, and HPOZ eligibility criteria.

Criteria Related to Events/Broad Patterns of History

A: National Register of Historic Places

1: California Register of Historical Resources

1: Historic Preservation Overlay Zone

Established between 1910 and 1923, immediately following the consolidation of Hollywood into the City of Los Angeles, the small but cohesive grouping of residential architecture that composes the extant contributors expresses the typical characteristics of a streetcar suburb. Therefore, the District is eligible under Criteria A/1 and as an HPOZ for its association with this broad pattern of historical development.

Criteria Related to Association with Significant Persons

B: National Register of Historic Places

2: California Register of Historical Resources

2: Historic Preservation Overlay Zone

Although the site record documenting the District in a 1984 survey referenced in ESA 2019 identified several individuals associated with various aspects of the development of the District, none of these individuals or associations appear to be sufficiently important or direct to justify eligibility under these criteria. Therefore, the District is eligible neither under Criteria B/2 nor as an HPOZ for its association with significant persons.

Criteria Related to Architectural Quality

C: National Register of Historic Places

3: California Register of Historical Resources

3: Historic Preservation Overlay Zone

As a small but cohesive grouping representative of early twentieth-century residential architecture styles, particularly the Craftsman style, the District is eligible under Criteria C/3 and as an HPOZ reflecting this architectural style and building type.

Criteria Related to Archaeology and/or Information Potential

D: National Register of Historic Places

4: California Register of Historical Resources

Archaeological significance is beyond the scope of this analysis. Research did not reveal any notable construction techniques expressed by the District. The design systems and construction techniques used throughout the District have been thoroughly researched and are well understood. The

District, therefore, is unlikely to yield information important in prehistory or history. This analysis therefore concludes the District cannot be considered significant under Criteria D/4.

3.2.2 1771 Vista del Mar Avenue



Figure 2. 1771 Vista del Mar Avenue, east elevation, view west (ICF 2019)

Architectural Description and Integrity Summary

ESA 2019 includes a detailed architectural description, photographic documentation, and integrity assessment of 1771 Vista del Mar Avenue. ICF has reviewed this material, finds it to be accurate based on ICF's independent assessment, and incorporates it by reference.

1771 Vista del Mar Avenue consists of a one-story, wood-frame, rectangular-plan, single-family residence originally designed in the Craftsman style. Set upon a sloped lot, its primary façade is asymmetrically composed and divided into two sections. The north section contains a large non-original vinyl window. The south section is sheltered by a projecting pedimented porch roof over the main entrance, which contains elements of the non-original stucco finish and is covered by a non-original metal security door flanked by identical non-original vinyl windows. The main entrance is approached by two flights of concrete stairs leading to a concrete porch defined by a non-original metal railing. The residence is topped by a side gable roof with modern non-original shingles and clad in non-original stucco. Landscaping consists of a single bush and an offset palm tree.



Figure 3. 1771 Vista del Mar Avenue, south and east elevations, view northwest (ICF 2019)

As detailed extensively in ESA 2019, the residence has been heavily altered after the District's identified period of significance. Previous documentation associated with the 1984 and 1994 evaluations notes its apparently original clapboard siding, now replaced with rough-textured green stucco. The earlier evaluation similarly notes original divided-light windows, now replaced by vinyl windows, which appear to have required the openings to be resized. The pedimented porch shelter previously featured a garlanded medallion, which has now been removed. Dense shrubbery previously characterized the landscaping, which is now significantly more barren.



Figure 4. 1771 Vista del Mar Avenue, north and east elevations, view southwest (ICF 2019)

With the exception of the footprint, roof shape, and portions of the pediment, none of the character-defining features conveying its original Craftsman style remain in place. While the residence retains integrity of location and, to some degree, of setting, integrity of feeling, association, design, materials, and workmanship are completely lacking due to post-period of significance alterations that have eliminated key character-defining features that may have once associated the residence with the District but are now no longer in place.

Evaluation of Significance

Based on research and context developed in ESA 2019, the following provides ICF's independent professional assessment of 1771 Vista del Mar Avenue's NRHP, CRHR, and HCM/HPOZ eligibility.

Criteria Related to Events/Broad Patterns of History

A: National Register of Historic Places

1: California Register of Historical Resources

1: City of Los Angeles Historic Cultural Monuments/Historic Preservation Overlay Zone

Research did not reveal important associations between the residence at 1771 Vista del Mar Avenue and specific events or broad patterns of history consistent with individual eligibility under Criteria A/1/1.

Located within the boundary of the District and previously identified as a contributor, 1771 Vista del Mar Avenue has experienced extensive alterations conducted after the period of significance that have eliminated key character-defining features associated with its original design, the District's period of significance, and the Craftsman style associated with the District. It therefore does not retain the requisite degree of integrity to allow it to contribute to the District. For the same reasons, it would not contribute to an HPOZ should one be established for the District.

Criteria Related to Association with Significant Persons

B: National Register of Historic Places

2: California Register of Historical Resources

2: City of Los Angeles Historic Cultural Monuments

Ownership and telephone directory listings documented in ESA 2019 related to 1771 Vista del Mar Avenue did not reveal any significant persons associated with it.

Therefore, 1771 Vista del Mar Avenue is ineligible under Criteria B/2/2 individually.

Criteria Related to Architectural Quality

C: National Register of Historic Places

3: California Register of Historical Resources

3. City of Los Angeles Historic Cultural Monuments/Historic Preservation Overlay Zone

Originally designed in the Craftsman style by noted architect Frank Tyler, 1771 Vista del Mar Avenue has been too altered after its original construction to convey significance as an example of this style or as the work of a master. Therefore, 1771 Vista del Mar Avenue is not individually eligible under Criteria C/3/3.

Located within the boundary of the District and previously identified as a contributor, 1771 Vista del Mar Avenue has experienced extensive alterations conducted after the original construction and after the period of significance that have eliminated key character-defining features associated with its original design, the District's period of significance, and the Craftsman style associated with the District. Therefore, it does not retain the requisite degree of integrity to allow it to contribute to the District. For the same reasons, it would not contribute to an HPOZ should one be established for the District.

Criteria Related to Archaeology and/or Information Potential

D: National Register of Historic Places

4: California Register of Historical Resources

Archaeological significance is beyond the scope of this analysis. Wood-frame construction has been thoroughly researched and is well understood. 1771 Vista del Mar Avenue is unlikely to yield

information important in prehistory or history. This analysis therefore concludes 1771 Vista del Mar Avenue cannot be considered significant under Criteria D/4.

3.2.3 1765 Vista del Mar Avenue



Figure 5. 1765 Vista del Mar Avenue, east elevation, view west (ICF 2019)

Architectural Description and Integrity Summary

ESA 2019 includes a detailed architectural description, photographic documentation, and integrity assessment of 1765 Vista del Mar Avenue. ICF has independently reviewed this information and attests to its accuracy.

1765 Vista del Mar Avenue consists of a two-story, wood-frame, two-family residence with a rectangular floor plan and a steeply pitched side gable roof punctuated by three hipped gables. Clad in a combination of stucco and siding, the roof is sheathed in non-original composition shingles. Constructed in 1918 as a one-story single-family residence with a flat roof, the second story with gable roof was added in 1935, converting it to a two-story duplex with separate dwelling units on the first and second floors. Set on a north-to-south sloping lot, the primary elevation is symmetrically composed. The first story is three bays wide and features a central entrance sheltered by a non-original shingled shed roof. The wood front door is flanked by sidelights covered with

metal security bars. The northern and southern bays each contain single non-original side-by-side single light sash windows. The non-original second story is also three bays wide. Each bay contains a single non-original double sash window set within a dormer. The dormer in the central and southern bays is gabled while the northern bay dormer is hipped. The landscaping is characterized by several palms trees of various species. The building's original 1918 garage also appears to have been altered in 1935 at the time the second story was added, converting the garage from a single into a double garage and adding new servants' quarters.



Figure 6. 1765 Vista del Mar Avenue, north and east elevation, view southwest (ICF 2019)

As detailed above, this residence has been extensively altered after the period of significance since its original construction in 1918, which did occur during the period of significance. Originally featuring one story with a flat roof, duplex conversion adding a second new residence in a second story with a side gable roof occurred in 1935, effectively altering the original building beyond recognition. The front door appears to date to 1935, while the window sashes have been replaced more recently.



Figure 7. 1765 Vista del Mar Avenue, east and south elevations, view northwest (ICF 2019)

1765 Vista del Mar Avenue retains integrity of location and some degree of setting, although the setting has been substantially altered with the addition of the second story and the alterations to the original garage. Integrity of design, feeling, and association are completely lacking. ESA 2019 identifies interior features that retain integrity of materials and workmanship, but the exterior lacks these elements of integrity.

Evaluation of Significance

Based on research and context developed in ESA 2019, the following provides ICF's independent professional assessment of 1765 Vista del Mar Avenue's NRHP, CRHR, and HCM eligibility.

Criteria Related to Events/Broad Patterns of History

A: National Register of Historic Places

1: California Register of Historical Resources

1: City of Los Angeles Historic Cultural Monuments/Historic Preservation Overlay Zone

Research did not reveal important associations between the residence at 1765 Vista del Mar Avenue and specific events or broad patterns of history consistent with individual eligibility under Criteria A/1/1.

Located within the boundary of the District and previously identified as a contributor, 1765 Vista del Mar Avenue has experienced extensive alterations following the District's period of significance that have eliminated key character-defining features associated with its original design, the District's period of significance, and the Craftsman style associated with the District. It does not retain the requisite degree of integrity to allow it to contribute to the District. For the same reasons, it would not contribute to an HPOZ should one be established for the District.

Therefore, 1765 Vista del Mar Avenue is not eligible under Criteria A/1/1.

Criteria Related to Association with Significant Persons

B: National Register of Historic Places

2: California Register of Historical Resources

2: City of Los Angeles Historic Cultural Monuments/Historic Preservation Overlay Zone

Ownership and telephone directory listings related to 1765 Vista del Mar Avenue documented in ESA 2019 did not reveal significant persons associated with it.

Therefore, 1765 Vista del Mar Avenue is not eligible under Criteria B/2/2.

Criteria Related to Architectural Quality

C: National Register of Historic Places

3: California Register of Historical Resources

3: City of Los Angeles Historic Cultural Monuments/Historic Preservation Overlay Zone

Originally designed as a one-story, single-family residence with a flat roof, 1765 Vista del Mar Avenue is too altered to convey significance as an example of a particular style or building type. Therefore, 1765 Vista del Mar Avenue is not individually eligible under Criteria C/3/3.

Located within the boundary of the District, 1765 Vista del Mar Avenue has been extensively altered. As explained above, it does not retain the requisite degree of integrity to allow it to contribute to the District. For the same reasons, it would not contribute to an HPOZ should one be established for the District.

Therefore, 1765 Vista del Mar Avenue is not eligible under Criteria C/3 nor as an HPOZ contributor expressing high artistic value.

Criteria Related to Archaeology and/or Information Potential

D: National Register of Historic Places

4: California Register of Historical Resources

Archaeological significance is beyond the scope of this analysis. Wood-frame construction has been thoroughly researched and is well understood. 1765 Vista del Mar Avenue is unlikely to yield information important in prehistory or history and is thus not significant under Criteria D/4.

3.2.1 Yucca Argyle Apartments/6210–6224 West Yucca Street and 1756–1760 Argyle Avenue

Architectural Description and Integrity Summary



Figure 8. Yucca Argyle Apartments, 6210–6224 W. Yucca Street, north elevation, view southwest (ICF 2019)

ESA 2019 includes a detailed architectural description, photographic documentation, and integrity assessment of the Yucca Argyle Apartments. ICF has independently reviewed this information and, based on that review and ICF's own research and evaluation, finds it to be accurate.

Constructed in 1953, the Yucca Argyle Apartments are set on a rectangular parcel and consist of an arrangement of three two-story, multi-family residential buildings and a parking structure. All three residential buildings have a flat roof with overhang, stucco cladding, and symmetrical composition. The fenestration consists of non-original vinyl sashes throughout the buildings.



Figure 9. Yucca Argyle Apartments, 1756–1760 Argyle Avenue, north and west elevations, view southeast (ICF 2019)

Two of the residential buildings feature a U-shaped plan and one has a rectangular plan. The rectangular-plan building, the smallest of the three, is arranged at the northwest corner of the parcel, oriented to Argyle Avenue. The two identically sized U-shaped buildings are set to the east of the rectangular building. The bottom of the U faces north onto Yucca Street. The open portion of the U-shape opens south and contains a modestly landscaped space.

Evaluation of Significance

Based on research and context developed in ESA 2019, the following provides ICF's independent professional assessment of the Yucca Argyle Apartments' NRHP, CRHR, and HCM eligibility.

Criteria Related to Events/Broad Patterns of History

A: National Register of Historic Places

1: California Register of Historical Resources

1: City of Los Angeles Historic Cultural Monuments

Research did not reveal important associations between the Yucca Argyle Apartments and specific events or broad patterns of history consistent with individual eligibility under Criteria A/1/1.

Therefore, the Yucca Argyle Apartments are not eligible under A/1/1.

Criteria Related to Association with Significant Persons

B: National Register of Historic Places

2: California Register of Historical Resources

2: City of Los Angeles Historic Cultural Monuments

Research related to the owners and telephone directory listings of tenants at the Argyle Yucca Apartments documented in ESA 2019 did not reveal significant persons associated with it. Therefore, it is not eligible under Criteria B/2/2.

Criteria Related to Architectural Quality

C: National Register of Historic Places

3: California Register of Historical Resources

3: City of Los Angeles Historic Cultural Monuments

As an arrangement of two side-by-side U-shaped buildings, each featuring a modest landscaped area, and a rectangular-plan building, the Yucca Argyle Apartments are an unexceptional example of a courtyard apartment complex. Incorporating elements of the Minimal Traditional style such as horizontal massing and stucco cladding, it is an undistinguished expression of post-war multi-family residential architecture. Therefore, the Yucca Argyle Apartments are not eligible under Criteria C/3/3.

Criteria Related to Archaeology and/or Information Potential

D: National Register of Historic Places

4: California Register of Historical Resources

Archaeological significance is beyond the scope of this analysis. Wood-frame construction has been thoroughly researched and is well understood. Therefore, the Yucca Argyle Apartments are unlikely to yield information important in prehistory or history, and are thus not considered significant under Criteria D/4.

Chapter 4

Impacts Analysis

The following analyzes impacts on the identified individual and district resources that would occur as a result of implementation of the proposed Project.

Direct impacts resulting from the demolition associated with the proposed Project:

Vista del Mar/Carlos Historic District

The District is eligible for listing in the NRHP, is listed in the CRHR, and is eligible as an HPOZ. It is therefore a historical resource for the purposes of CEQA.

1771 Vista del Mar Avenue and 1765 Vista del Mar Avenue are technically, but inappropriately, classified as contributors to the District. As they are appropriately classified as non-contributors and located at the periphery of the District, the proposed demolition of these two resources as part of the Project would have a less-than-significant impact on the District because the District would retain eligibility after their demolition.

1771 Vista del Mar Avenue

1771 Vista del Mar Avenue is individually ineligible for listing in the NRHP, CRHR, and as an HCM. 1771 Vista del Mar Avenue is also ineligible as a contributor to the District due to substantial alterations outside the District's period of significance that have eliminated its integrity as a contributor.

It is therefore not appropriately considered a historical resource under CEQA. Its demolition, therefore, would not result in a significant impact on a historical or cultural resource.

1765 Vista del Mar Avenue

1765 Vista del Mar Avenue is individually ineligible for listing in the NRHP, CRHR, and as an HCM. 1765 Vista del Mar Avenue is also ineligible as a contributor to the District due to substantial alterations outside the District's period of significance that have eliminated its integrity as a contributor.

It is therefore not appropriately considered a historical resource under CEQA. Its demolition, therefore, would not result in a significant impact on a historical or cultural resource.

Yucca Argyle Apartments

The Yucca Argyle Apartments are individually ineligible for listing in the NRHP, CRHR, and as an HCM, and they do not contribute to a historic district.

Therefore, they are not a historical resource for the purpose of CEQA. Their demolition would not result in a significant impact on a historical or cultural resource.

Indirect impacts resulting from operation of the proposed Project:

Vista del Mar/Carlos Historic District

The District is eligible for listing in the NRHP, is listed in the CRHR, and is eligible as an HPOZ. It is therefore a historical resource for the purposes of CEQA.

Planned for the northern edge of the District, Building 2 of the Project would rise to three stories in height, slightly taller than the adjacent one- and two story residences composing the District. Designed in a contemporary version of Prairie style, Building 2's horizontal massing and hipped roof would be compatible with, yet differentiated from, the Craftsman-style residences along Vista del Mar Avenue. Building 2 would serve as a buffer between the low-scale neighborhood and Building 1's 20-story glass tower. Based on its size, scale, and modern style, Building 1 would be clearly differentiated from the District. Set across Argyle Avenue and Yucca Street from recent tall buildings, its location would allow it to blend in with the adjacent new high-rise buildings that immediately surround it to the north and west, and would be therefore appropriately separated from the District consistent with Standard 9.

Although construction of new buildings at the edge of the District constitutes a change to its setting, the elements of the setting itself have already been altered following the period of significance of the District, and the new construction would be sufficiently compatible and differentiated to ensure that the impact on the District would be less than significant. The District would maintain its eligibility for listing following construction of the Project.

Chapter 5

Conclusion

The following four resources would be subject to direct impacts as a result of the demolition required in order to construct the proposed Project.

Table 1. Direct Impact Potential from Construction

Resource	Eligibility/CEQA Historical Resource Status	Direct Impact from Demolition
Vista del Mar/Carlos Historic District	Eligible for listing in the NRHP; Listed in the CRHR; Eligible as an HPOZ	Less than significant
1771 Vista del Mar Avenue	Individually ineligible; Ineligible as a contributor to the Vista del Mar/Carlos Historic District; Not a CEQA historical resource	No impact
1765 Vista del Mar Avenue	Individually ineligible; Ineligible as a contributor to the Vista del Mar/Carlos Historic District; Not a CEQA historical resource	No impact
Yucca Argyle Apartments	Individually ineligible; Not a CEQA historical resource	No impact

The following resource would be subject to indirect impact as a result of the operation of the proposed Project.

Table 2. Indirect Impact Potential from Operation

Resource	Eligibility/CEQA Historical Resource Status	Indirect Impact from Operation
Vista del Mar/Carlos Historic District	Eligible for listing in the NRHP; Listed in the CRHR; Eligible as an HPOZ	Less than significant

Appendix A

Resume of Author

COLLEEN DAVIS

Senior Architectural Historian

Colleen Davis offers 18 years of historic consulting experience. She manages large-scale field surveys and high volume desktop review projects. She is an expert in evaluating properties for National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) eligibility. Colleen specializes in the development of historic contexts and regularly obtains concurrence from State Historic Preservation Officers for determinations of eligibility. Colleen has evaluated hundreds of properties in Los Angeles including work on three Historic Preservation Overlay Zones.

Colleen's agency experience in the Los Angeles area includes work with the City of Los Angeles (Housing and Community Development Departments; Housing and Community Investment & Development; Bureau of Engineering; Department of Recreation and Parks; and General Services Department) and the County of Los Angeles (Public Works Department).

Additionally Colleen has prepared NRHP evaluations, conducted Section 106 analysis, and supported SHPO consultation in states such as California, South Carolina, Montana, Michigan and New Jersey on behalf of a variety of federal government agencies including Housing and Urban Development, Department of Energy, Federal Transit Authority, Federal Railroad Administration, General Services Administration, and Surface Transportation Board. Colleen exceeds the Secretary of the Interior's professional qualifications standards in history and architectural history.

Project Experience

Environmental Services Cultural Assessment for Weatherization Projects—California Department of General Service and Department of Community Services and Development, Statewide, California, 2011 – Present

Program Manager. Since 2011, Colleen has managed a program for the state of California to implement the first amended programmatic agreement among the CEC, Department of Community Services and Development, and the California SHPO Regarding Section 106 compliance for Department of Energy programs to provide National Historic Preservation Act Section 106 compliant reviews. Colleen manages over 30 staff located in six ICF offices to complete Section 106 reviews for over 13,000 properties. Review results are delivered within 2 business days, allowing the projects to proceed to construction without unnecessary delay. Key drivers for this project include accuracy and speed. Its paperless business process relies on customized technology tools and a desktop review protocol, which have been critical to its success. Colleen worked with ICF information technology specialists to develop data management tools including a customized multi-



Years of Experience

- Professional start date: 08/2000
- ICF start date: 06/2006

Education

- MA, History, California State University, Fullerton, 2010
- BA, English, University of California, Los Angeles, 1990

Professional Memberships

- Urban History Association
- Association for Preservation Technology
- Vernacular Architecture Forum
- National Trust for Historic Preservation
- Los Angeles Conservancy
- Chicago Architecture Foundation
- Landmarks Illinois

Professional Development

- Short Courses in Historic Preservation/Summer, University of Southern California, 2000

function Access database that provides workflow for reviewers to save time and ensure accuracy; storage of research notes to support the administrative record; recordation of metadata for reporting; and production of customized reports, including those required by the SHPO. The project workflow includes QA by senior subject matter experts. Additionally, Colleen oversaw development of a program-specific SharePoint site that houses statewide cultural resources data including landmark lists, historic preservation elements and ordinances, and design review guidelines for 600 communities across California which saves research time to expedite reviews. In her role, Colleen ensures that appropriately qualified staff are available daily, quality products are delivered, and timely completion of reviews. Colleen also consults with SHPO on behalf of CSD.

Statewide Cultural Resources Compliance—California Department of General Service, Statewide, California, 2015 – Present

Project Manager. Since 2015, Colleen has managed ICF's on-call contract to provide historical resources evaluation and consultation for state-owned buildings on behalf of DGS. Under this contract, Colleen has overseen evaluation of more than 10 state buildings in Sacramento, Redding, Red Bluff, San Diego, and Fresno. In compliance with Public Resources Code 5024 & 5024.5, Colleen's team evaluated National Register of Historic Places, California Register of Historical Resources, and California Historical Landmark eligibility. Detailed historic contexts prepared for these evaluations included local contexts for each city, statewide contexts tied to relevant events and time periods, Mid-century Modern architecture, Late Modern architecture, and sustainable/energy efficient architecture. In some cases, extensive integrity analysis was required. On behalf of DGS, Colleen's team successfully obtained SHPO concurrence for all eligibility/ineligibility determinations.

Department of Housing and Urban Development (HUD) Section 106 Review—City of Los Angeles, Housing and Community Investment Department, Los Angeles, California, 2006 – 2017

Deputy Project Manager. Colleen oversaw HUD Section 106 reviews for the City of Los Angeles. Colleen deputy managed Section 106 reviews totaling approximately 200 National Register of Historic Places property evaluations each year from 2006 through 2017. In addition to coordinating a team of architectural historians to perform field survey, research, and evaluation of properties potentially affected by proposed undertakings, Colleen's responsibilities included preparing more than 20 determinations of National Register eligibility and 30 Findings of Effect analyzing effects to historic properties; advising on methods to avoid, minimize, or mitigate adverse effects; and consulting with SHPO to resolve adverse effects. Over the thousands of projects reviewed during the 11 years ICF held this contract, a memorandum of agreement to resolve adverse effects was needed on only three occasions.

Camp Hall Rail NEPA Analysis—Surface Transportation Board (STB), Army Corps of Engineers (Corps) Berkeley County, South Carolina, 11/2017 – Present

Cultural Resources Lead. Colleen leads the cultural resources analysis. She is the primary author of the NHPA Section 106 Finding of Effect which concluded no adverse effect would result from the construction and operation of a new 30-mile long proposed rail line with two linear NRHP-eligible historic properties and a historic cemetery in its area of potential effects. SHPO concurred with this finding. She is also the primary author of the environmental document analysis. Federal Railroad Administration and United States Coast Guard are cooperating agencies. ICF is analyzing effects under NEPA and the NHPA

California High-Speed Train, Los Angeles to Anaheim—California High-Speed Rail Authority/STV, Los Angeles to Anaheim, California, 08/2015 – present

Architectural Historian. Colleen supports the built environment team identifying resources, conducting archival research, preparing of technical reports (including Historic Architectural Survey Report and Finding of Effect), and drafting the environmental document section accordance with the guidance provided by the CHSRA. ICF is preparing technical documents and an Environmental Impact Report/Environmental Impact Statement in compliance with CEQA, NEPA, and the NHPA. The HSR Project Alternative utilizes an existing rail corridor that traverses dense urban and suburban neighborhoods developed with a wide variety of residential, commercial, industrial, and transportation building types

California High-Speed Train, Palmdale to Burbank—California High-Speed Rail Authority/ Circlepoint, Palmdale to Burbank, California, 08/2015 – present

Architectural Historian. Colleen supports the built environment team identifying resources, conducting archival research, and preparing technical reports in accordance with the guidance provided by the CHSRA. ICF is providing technical expertise in Biology, Air Quality and Cultural Resources in support of the supplemental alternatives analysis and EIR/EIS for the Palmdale to Burbank Project Section. Three alternatives under analysis travel from the proposed Palmdale Station to the proposed Burbank Station. Alternatives include tunnels through a national forest, as well as at-grade and elevated track through rural, agricultural, suburban and dense urban residential/ commercial areas.

Surface Transportation Board, Tongue River Railroad EIS - Custer, Powder River and Rosebud Counties, Montana, 2012 – 2015

Architectural Historian, Built Environment Lead. ICF prepared a NEPA Environmental Impact Statement for the approximately 83 mile rail line proposed by the Tongue River Railroad Company in southeastern Montana. The draft EIS was issued in April 2015 and the project stopped at the Applicant's request in 2016. To support Section 106 compliance and impacts analysis, Colleen oversaw field survey crews that collected built environment data and photographed potential historic resources across multiple alternatives totaling approximately 200 miles and encompassing over 46,000 acres. Colleen prepared a draft of the historic built environment portion of the cultural resources EIS section including historic context and detailed impacts analysis of potential historic resources. Colleen additionally supported Section 106 consultation with the Montana SHPO, Advisory Council on Historic Preservation, 9 local and national consulting parties, and 21 federally recognized tribes including two multi-day in-person meetings.

Metro Gold Line Eastside Extension Phase II Section 106 and CEQA Cultural Resources—Los Angeles County Metropolitan Transportation Authority and Camp, Dresser & McKee, Inc., California, 2010-2012

Architectural Historian. Colleen served as author for determinations of NRHP eligibility, analyzing property significance, character-defining features, and integrity. ICF, as part of a larger consultant team, conducted cultural resources analyses for the Metro Gold Line Eastside Extension. The project entailed performing historic and cultural surveys of buildings 1985 and older along two alternative routes for future light rail extension. Approximately 600 properties were inventoried, and each required a DPR 523 form.

State of New Jersey, Department of Environmental Protection (NJDEP), Program Management for Environmental and Historic Preservation Reviews related to HUD Community Development Block Grant – Disaster Recovery (CDBG-DR) funded Superstorm Sandy Recovery, 2015 – 2018

Architectural Historian and Section 106 Specialist. Colleen provides technical assistance related to historic preservation and environmental compliance associated with disaster relief funds provided by HUD for the State of New Jersey's Superstorm Sandy recovery effort. New Jersey received \$3.2 billion in CDBG-DR grant funds to support the housing, business, and infrastructure repair needs in the nine counties most impacted by the storm. ICF works directly with NJDEP in managing compliance with the National Environmental Policy Act (NEPA) and Section 106. Section 106 compliance for these undertakings is governed by a programmatic agreement among the Federal Emergency Management Agency, the New Jersey State Historic Preservation Office, the New Jersey State Office of Emergency Management, the Advisory Council on Historic Preservation, and others as a result of Hurricane Sandy. Colleen advises NJDEP on Section 106 compliance and consults with NJSHPO to resolve adverse effects to historic properties.

Echo Park Historic Preservation Overlay Zone (HPOZ) Historic Resources Survey—Los Angeles Department of City Planning, California, 2006

Field Investigator and Researcher. Colleen conducted research and field survey of more than 300 properties. ICF conducted a historic resources survey to evaluate the Echo Park neighborhood as an HPOZ.

Jefferson Park HPOZ Historic Resources Survey—Los Angeles Department of City Planning, California, 2010

Historic Context Statement Author. Colleen served as historic context statement author for a proposed HPOZ that developed extensive architectural contexts and historic contexts that highlight the ethnic, class, and racial diversity of this Los Angeles neighborhood, which is home to one of the most intact and cohesive collections of bungalows in Los Angeles. She photographed over 1,500 properties in the proposed district.

West Adams Terrace HPOZ Historic Resources Survey—Los Angeles Department of City Planning, California, 2001

Field Investigator and Researcher. While employed with Historic Resources Group, Colleen conducted research and field survey for an adopted HPOZ in the West Adams district of Los Angeles containing over 500 properties.

Cultural Survey for State Route 138 (SR-138) Widening Project—Caltrans, Palmdale, California, 2010

QA/QC Reviewer. Colleen performed QA/QC on DPR 523 forms to ensure accuracy. ICF conducted an archaeological survey, architectural survey, and paleontological assessment for this project, involving 10 miles of new ROW for the relocation of SR-138, and five miles of existing ROW for improvements and a new off ramp for SR-14. The project involved close coordination with Caltrans staff to accommodate design changes and to coordinate entry permits with landowners. ICF archaeologists recorded 18 new sites, primarily historical, and prepared an ASR to Caltrans' standards. ICF architectural historians conducted background research, surveyed the built environment of the project APE, wrote a historic context, prepared DPRs forms, and drafted an HRER to document identification, recordation, and evaluation efforts for built environment resources.