

**C-2 Supplement to
Historical Resources
Assessment and
Environmental Impacts
Analysis, 6220 West
Yucca Project, Los
Angeles**

memorandum

date July 8, 2020

to Riley Realty, LP

cc

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subject Supplement to Historical Resources Assessment and Environmental Impacts Analysis, 6220 West Yucca Project, Los Angeles, California

This Memorandum has been prepared as a Supplement to the previous Historic Resources Assessment and Environmental Impacts Analysis (Historical Resources Assessment Report) prepared by ESA in August 2019, included in Appendix D of the Draft EIR for the 6220 W. Yucca Project (ENV-2014-4706-EIR, State Clearinghouse No.: 2015111073). The purpose of this Memorandum is to analyze the potential impacts of the Modified Alternative 2 to historical resources for compliance with the California Environmental Quality Act (CEQA). The analysis of historical resources provided in this Memorandum is based on the *Historical Resources Assessment and Environmental Impacts Analysis Report* (Historical Resources Assessment Report) prepared by ESA's Historic Resources Division in August 2019 and the *6220 Yucca Street Historical Resources Peer Review Report* (Historical Resources Peer Review Report), prepared by ICF in August 2019, both included in Appendix D of the Draft EIR, which are summarized in Chapter IV. C, *Cultural Resources*, of the Draft EIR.

1. Modified Alternative 2 Description

The Modified Alternative 2 would be located on the same approximately 1.16-acre (net area) property as the Project on the south side of West Yucca Street between Argyle Avenue and Vista Del Mar Avenue, with addresses of 6216 Yucca Street, 1777-1779 N. Vista Del Mar Avenue, 1771 N. Vista Del Mar Avenue, and 1765-1767 N. Vista Del Mar Avenue. The Modified Alternative 2 proposes to eliminate the Project's hotel uses (136 rooms) and to build residential uses and ground level/retail restaurant space only. The Modified Alternative 2 would be similar in use to Alternative 2, the "Primarily Residential-Mixed Use Alternative," evaluated in the Draft EIR.

The Modified Alternative 2, as with Alternative 2, would include a total of 271 residential units, as compared to the Project's total of 210 residential units. The residential units under the Modified Alternative 2 would include two single-family residences on N. Vista Del Mar in addition to the 269 multi-family units in the new building, for a total of 271 units. The Project's 3-story, 13-unit Building 2 proposed along N. Vista Del Mar Avenue (within the East Parcels) would not be constructed under the Modified Alternative 2. Under the Modified Alternative 2, the residence at 1771 N. Vista Del Mar Avenue would not be demolished as under the Project, but would remain as a single-family use, and, similarly, the residence at 1765-1767 N. Vista Del Mar Avenue would also be retained.

Furthermore, the residence at 1765-1767 Vista Del Mar Avenue, which had previously been converted from a single-family residence to a duplex with an additional unit over the garage, will be returned to a single-family home under the Modified Alternative 2.

The Modified Alternative 2 would increase the Project's open space from 24,350 square feet to 30,400 square feet. The open space would include a 2,820-square-foot publicly-accessible park at the corner of Vista Del Mar Avenue and Yucca Street. The park would replace the existing fenced and paved parking lot currently occupying that location and would be available for use by the surrounding neighborhood. The proposed park would include passive park facilities (i.e., common open space and landscaped areas with sitting areas shaded by trees) serving the local neighborhood. Parking facilities under the Modified Alternative 2 would be accessed via a single driveway on Argyle Avenue, thus, eliminating the driveway along on Yucca Street proposed by the Project.

The Modified Alternative 2's single building, Building 1, would provide 312,246 square feet of new floor area. Because the existing on-site residences along Vista Del Mar contain 4,702 square feet of existing floor area, the total Modified Alternative 2 floor area would 316,948 square feet, which is the same as the Project. As with the Project, the Modified Alternative 2's anticipated Floor Area Ratio (FAR) would be 6.6:1. The Modified Alternative 2's new Building 1 would provide a total of 269 residential units. That building would be developed with a narrower east/west profile than the Project's Building 1, and as compared to the Project's building height of 20 stories (255 feet), the Modified Alternative 2's building height would be 30 stories (348 feet to the top of the parapet). Building heights are measured from the low point of the property to the top of the parapet. Under the Modified Alternative 2, the building dimensions would be reduced to approximately 80 feet x 180 feet as compared to the Project's high-rise component's dimension of 80 feet x by approximately 257 feet. The reduction would occur along the east/west axis, thus reducing the Modified Alternative 2's high-rise profile as viewed from the north from Yucca Street and from the south. This reduction would also allow for a greater setback of the high-rise component from Vista Del Mar Avenue. The Modified Alternative 2's high-rise component would rise above the five-story parking podium, which would be faced by ground-level retail/restaurant uses. The Modified Alternative 2 would have an east/west dimension of approximately 180 feet. By comparison, the east/west dimension of the Project's 20-story tower would be approximately 257 feet. The north/south dimension of the high-rise component would be 80 feet, similar to the Project.

Similar to the Project, the Modified Alternative 2 would have a 16-foot side yard setback along its southern edge. The Modified Alternative 2's high-rise component would be set back from the Vista Del Mar residential property (East Parcels) by approximately 77 feet and from Vista Del Mar Avenue by approximately 162 feet. It would be set back from the Argyle Avenue sidewalk by 17 feet (similar to the Project) and from Yucca Street by approximately 52 feet (similar to the Project). Similar to the Project, the exterior boundaries of the Project Site under the Modified Alternative 2 along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue would include a streetscape design allowing for pedestrians, potential café tables, parkway planters, and bike parking. All of the open space areas would provide landscaping and detailed hardscape. Street trees would be planted along Yucca Street and Argyle Avenue, and trees would be planted in the park in the eastern portion of the Project Site. The Modified Alternative 2 would plant 76, 24-inch box minimum trees, compared to 68 trees under the LAMC requirements. Along Argyle Avenue, as with the Project, the Modified Alternative 2 would reduce the existing sidewalk width from approximately 12 feet to approximately 9.5 feet, but, like the Project, the narrowed sidewalk would not cause pedestrian capacity constraints on Argyle Avenue. Along Yucca Street, the sidewalk would be widened compared to existing conditions. As with the Project, sidewalk widths under the Modified Alternative 2 would vary along Yucca Street adjacent to the proposed building, with widths ranging from approximately 8.33

feet to 14-feet. Adjacent to the park, the sidewalk width would approximately 5.83 feet and 3.83 feet along Vista Del Mar Avenue.

The conceptual design of the Modified Alternative 2's Building 1 is modern, featuring a mix of glass and solid panel clad exterior walls for the residential components and the parking podium. Building 1 would have two massing components. The lower section with the 5-story parking structure is clad in solid panels, and it would act as a strong base for the glass-clad tower. The base would have natural gray-tinted windows in addition to solid panels. Blue-tinted glass would be used for the tower component's exterior windows. A combination of balcony cutouts and overhangs on the all-glass tower component would create patterns that ripple across the building's facades.

Retail/restaurant uses (7,780 square feet) would be located along the Modified Alternative 2's Yucca Street frontage at Level 1 and at the corner of Yucca Street and Argyle Avenue in the P-1 Level, and would be accessible from the street level at that point. Residential uses would occupy Levels 6 through Level 29 of Building 1. Approximately 14,720-square-feet of open space, including a swimming pool, seating and landscaping would be provided at the top of the 5-level podium at Level 6. Loading, recycling, trash removal, and collection for the residential and commercial/restaurant uses would occur in designated areas within the interior areas of Level 1 such that noise, odor, or other impacts to nearby residents would be minimized. The Modified Alternative 2's features with respect to lighting and signage, site security and sustainability would be similar to the Project's features.

Attachment **Figure 3-1**, *Conceptual Site Plan – Modified Alternative 2*, shows the relative dimensions and setbacks of Building 1. It also shows the location of the two residential properties on the East Parcels that would be single-family dwellings. **Figure 3-2**, *Level 6 Plan – Modified Alternative 2*, illustrates the first residential floor and the standard layout of residential units, as well as the podium open space. The top level of Building 1, Level 30, would provide a 6,260-square-foot roof garden and swimming pool. This level is illustrated in **Figure 3-3**, *Level 30 Plan – Modified Alternative 2*. The profile of the high-rise component is illustrated in **Figure 3-4**, *East/West Building Section – Modified Alternative 2*, and in **Figure 3-5**, *North Elevation – Modified Alternative 2*. The full plan set for the Modified Alternative 2, including renderings, elevations, floor plans, and landscape plans are contained in the Final EIR as Appendix B.

2. Existing Site Improvements

The 1.16-acre (approximately 50,364-square-foot) Project Site consists of four parcels (Assessor Parcel Numbers ("APN") 5546-031-031, 5546-031-007, 5546-031-008, and 5546-031-027) on the south side of West Yucca Street between Argyle Avenue and North Vista Del Mar Avenue (addresses: 1756, 1760 North Argyle Avenue; 6210-6218 and 6220-6224 Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue) in the Hollywood Community Plan area of the City of Los Angeles, approximately five miles northwest of Downtown Los Angeles. The Project Site is bounded by Yucca Street, Kimpton Everly Hotel, and 3-story residential lofts to the north; North Vista Del Mar Avenue and one- and two-story single-family residences and duplexes to the east; vacant land (former Little Country Church of Hollywood) and one- and two-story single-family residences and duplexes followed by a five-story mixed-use residential and commercial development to the south; and Argyle Avenue and the 16-story Argyle House mixed-use project to the west (please see Figure II-2, *Aerial Photograph with Surrounding Land Uses*, in Chapter II, *Project Description*, of the Draft EIR).

The Project Site is currently improved with three two-story apartment buildings (“Yucca Argyle Apartments”) and associated carports and paved surface parking areas, one single-family residence (“1771 Vista del Mar Avenue”), and one duplex with an apartment over the garage (“1765 Vista del Mar Avenue”). The western portion of the Project Site is improved with the Yucca Argyle Apartments constructed in 1953. Two of the apartment buildings are oriented north toward Yucca Street, while the smaller third building faces west toward Argyle Avenue. A parking lot is located behind the buildings and is accessed via two driveways on Yucca Street.

A single-family residence at 1771 Vista del Mar Avenue and a duplex with an apartment over the garage at 1765 Vista del Mar Avenue occupy the east end of the Project Site and are both oriented to the east toward Vista del Mar Avenue. 1765 Vista del Mar Avenue was originally constructed as a one-story single-family residence in 1918. In 1935, the property’s owner added a second floor, converting the residence into a two-story duplex. A detached garage was altered in 1931, adding a second floor to serve as servant’s quarters. Today, the servant’s quarters are used as a studio apartment. Directly adjacent to 1765 Vista del Mar Avenue to the north is 1771 Vista del Mar Avenue. Constructed in 1920 as a Craftsman style bungalow with wood cladding, the residence has been significantly altered with the addition of stucco siding, roofing, and windows after the original construction. All structures over 45 years in age situated on the Project Site were evaluated for their eligibility as potential historic resources and the results were incorporated into the *Historical Resources Assessment and Environmental Impacts Analysis Report* (Historical Resources Assessment Report) included in Appendix D of the Draft EIR, which are summarized in Chapter IV. C, *Cultural Resources*, of the Draft EIR.

3. Previously Identified Historical Resources

a. Historical Resources Identified within the Project Vicinity

The records search and review indicated that 16 previously identified individual historical resources are situated within a 0.25-mile radius of the Project Site that, based on their proximity, were considered and analyzed for any potential to be indirectly affected by the Modified Alternative 2 as the result of alteration of their immediate surroundings.¹ A description of the historical resources in the Project Site vicinity is included in the Historical Resources Assessment Report and the Historical Resources Peer Review Report, both included in Appendix D of the Draft EIR. A summary table listing historical resources identified in the Project Site vicinity is provided in the Historical Resources Assessment Report in Table 8, Previously Recorded Resources within a 0.25 Mile Vicinity of the Project Site, and these resources are summarized in Chapter IV.C, *Cultural Resources*, of the Draft EIR.

b. Historical Resources Identified within the Project Site

For the purposes of the analysis in the Draft EIR, 1771 and 1765-1767 North Vista Del Mar Avenue (contributors to the Vista del Mar/Carlos Historic District), and 6210-6218 and 6220-6224 Yucca Street and 1756-1760 North Argyle Avenue (Yucca Argyle Apartments), were re-evaluated in ESA’s 2019 Historical Resources Assessment Report to determine whether their proposed demolition as part of the original Project would result in a substantial adverse change to the Vista del Mar/Carlos Historic District. The detailed existing conditions architectural description and results of the intensive-level re-evaluation are included in the Historical Resources Assessment Report in Appendix D in the Draft EIR and summarized below.

¹ Historical resources were identified during the 2010 Historical Resources Survey of the Hollywood Redevelopment Project Area.

i. Vista del Mar/Carlos Historic District and 1771 and 1765-1767 North Vista del Mar Avenue

Of the four parcels comprising the Project Site, two parcels (1765-1767 and 1771 North Vista Del Mar Avenue) are situated within the Vista del Mar/Carlos Historic District, a contiguous grouping of 13 contributors and three non-contributors occupying an L-shaped area, including the properties flanking North Vista Del Mar Avenue (part of Tract 2209) and Carlos Avenue (part of Del Mar Tract) between Yucca Street to the north and North Gower Street to the east. A detailed description of the Vista del Mar/Carlos Historic District is provided in the Historical Resources Assessment Report, including a list of contributing buildings in Table 9, a map of the district on Figure 61, *Historic Resources Adjacent to the Project Site*, current survey data is summarized in Table 10, and the previous survey data is provided in Appendix E. The Vista del Mar/Carlos Historic District is comprised of residences constructed between 1908 and 1922 and is characterized by Craftsman, Arts and Crafts, and Spanish Colonial Revival styles with one- and two-story residences setback from the street behind a lawn or yard, with concrete driveways on the side of the lots leading to garages at the rear of the lots. North Vista Del Mar and Carlos Avenue are lined with sidewalks and street trees. Along North Vista Del Mar Avenue, the residences are smaller in scale and are mostly one-story single-family residences improved on small identically-sized lots. The residences along Carlos Avenue are larger in scale, two stories and, are sited on larger lots with deeper setbacks.

In a 1984 local survey, the Vista del Mar/Carlos Historic District was found to be locally significant and assigned a CHR Status Code of 5S2.² Both 1765-1767 and 1771 North Vista Del Mar Avenue were identified as contributors to the Vista del Mar/Carlos Historic District in the 1984 survey. In September of 1994, following the Northridge earthquake, the Vista del Mar/Carlos Historic District was resurveyed and assigned a CHR Status Code of 2D2; determined eligible for the National Register by consensus through the Section 106 process.³ The Vista del Mar/Carlos Historic District was surveyed again during the 2010 Hollywood Survey that identified 14 contributors with a 2D2 CHR Status Code in the Vista del Mar/Carlos Historic District. One residence at 1771 North Vista del Mar Avenue was downgraded to 6Z CHR Status Code (ineligible for listing in the California Register) due to substantial alterations adversely affecting its integrity. This conclusion was reconfirmed and is documented in the Historical Resources Assessment Report and Historical Resources Peer Review Report (included in Appendix D in the Draft EIR).

The residence at 1765-1767 North Vista Del Mar Avenue was originally constructed in 1918 as a one-story single-family residence that had a flat roof. Alterations in 1935 added a second floor with a cross-gabled roof and Minimal Traditional details. The residence no longer retains its original appearance or character-defining features from its original 1918 construction. The residence was originally designed by local Hollywood architect Harold B. Dunn. However, alterations in 1935 have compromised Dunn's original design and therefore the Residence no longer conveys Dunn's original design intent. Substantial alterations including the addition of a second floor have transformed the original single-family residence into a duplex, which occurred outside the identified period of significance for the district. These alterations have resulted a substantial adverse change that materially impairs the property's integrity and significance. Furthermore, 1765-1767 North Vista Del Mar Avenue was incorrectly

² Vista del Mar/Carlos Neighborhood District DPR Form, Prepared by L. Heumann and C. McAvoy, Hollywood Heritage/CRA (September 1984).

³ L. Heumann and C. McAvoy, Vista del Mar/Carlos Neighborhood, Department of Parks and Recreation Historic Resources Inventory form, 19-176308. HRI #100892, July 1, 1994. The following 16 properties were identified as contributors to the Vista del Mar/Carlos Historic District in the 1994 survey: 1735 Gower Street, 6118 Carlos Ave., 6122 Carlos Ave., 6128 Carlos Ave., 6136 Carlos Ave., 6142-44 Carlos Ave., 1750 Vista del Mar Ave., 1751 Vista del Mar Ave., 1756 Vista del Mar Ave., 1757 Vista del Mar Ave., 1760 Vista del Mar Ave., 1763 Vista del Mar Ave., 1764 Vista del Mar Ave., 1767 Vista del Mar Ave., 1770 Vista del Mar Ave., 1771 Vista del Mar Ave.

identified in previous surveys beginning in 1984, when the residence was first identified as a contributor to the Vista del Mar/Carlos Historic District, despite the survey noting the residence has a second-story addition (1935) that altered the original 1918 residence beyond recognition. It appears that subsequent surveys also repeated this error. Therefore, based upon the property research and documentation of the property in the Historical Resources Assessment Report, the intensive-level analysis concluded that 1765-1767 North Vista Del Mar Avenue was incorrectly identified previously as a contributor to the Vista del Mar/Carlos Historic District, and that the property should be reassigned a 6Z CHR Status Code. This conclusion was based on the substantial alterations to the exterior and interior of the building following its initial construction in 1918, including, most-significantly, the second-story addition, as well as the replacement of the original flat roof with a cross-gabled roof in 1935 after the end of the period of significance for the Vista del Mar/Carlos Historic District (1908-1922). Both the second-story addition and roof replacement effectively eliminate the ability of the building to convey its historic associations with early twentieth-century residential neighborhood development in Hollywood, or architect Harold Dunn, and, thus, it cannot be considered significant either as an individual resource or as a contributor to the Vista del Mar/Carlos Historic District.

The assessment of both 1765-1767 and 1771 North Vista Del Mar Avenue in the Historical Resources Assessment Report and Historical Resources Peer Review Report in Appendix D of the Draft EIR concluded that the two residences on the Project Site have both been substantially altered and no longer retain their historic integrity or significance and are, therefore, not eligible at the federal, State, or local levels either individually or as contributors to the Vista del Mar/Carlos Historic District. Neither residence retains integrity, nor are they representative of the development of Tract 2209 and the early settlement of Hollywood. Furthermore, they are not associated with historic events or personages. Lastly, the residences are not exceptional, distinctive, outstanding, or singular examples of a type or style. Therefore, they were both assigned a CHR Status Codes of 6Z, found ineligible for NR, CR or Local designation through survey evaluation, in the Historical Resources Assessment Report, and in the Historical Resources Peer Review Report (Appendix D in the Draft EIR).

ii. 6210-6218 and 6220-6224 Yucca Street and 1756-1760 North Argyle Avenue (Yucca Argyle Apartments)

The Yucca Argyle Apartments were surveyed during the 2010 Hollywood Survey, which concluded that the apartments were ineligible for listing in the National Register, California Register, or as a local landmark. The re-evaluation of the Yucca Argyle Apartments in the Historical Resources Assessment Report and in the Historical Resources Peer Review Report included in Appendix D of the Draft EIR similarly concluded that the Yucca Argyle Apartments appear ineligible for listing under any federal, State or local eligibility criteria. Built in 1953, the Yucca Argyle Apartments were constructed much later than the development of the surrounding neighborhood and, therefore, do not contribute to the earlier development history of the area. As a product of the post-war era, the Yucca Argyle Apartments are properly associated with Los Angeles' mid-century population growth after World War II. However, the Yucca Argyle Apartments are physically isolated from other similar multi-family housing developments in Hollywood and do not appear to hold any significant associations with this period of development. Furthermore, the Yucca Argyle Apartments do not appear associated with persons significant to local, State, or national history. Finally, the Yucca Argyle Apartments are common examples of mid-century multi-family residences built as income producing properties and do not meet the threshold of being excellent examples of the courtyard apartment building type or any other building type. Alterations to the Yucca Argyle Apartments after its final construction, including the replacement of all windows with modern vinyl sliding windows, have significantly affected the buildings' integrity of design, materials, and workmanship. For the additional reason of a loss of

integrity, the buildings are not eligible as excellent examples of the courtyard apartment building type. Furthermore, the Yucca Argyle Apartments are not the work of a master architect or builder. As a result, the Yucca Argyle Apartments were assigned a CHR Status Code of 6Z, “found ineligible for National Register, California Register or local designation through survey evaluation.”

4. Impacts Analysis

a. Thresholds of Significance

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

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

In assessing the Project’s potential impacts related to historical resources in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G question:

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

b. Methodology

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 may otherwise impact any historic resource(s), and, if so, (2) a determination of whether the Project would result in a “substantial adverse change” in the significance of the identified resource or resources.⁴

A Historical Resources Assessment Report, and Historical Resources Peer Review Report included in Appendix D, were conducted by personnel that meet and exceed the Secretary of the Interior’s Professional Qualification Standards in history, architectural history and historic architecture. The key steps taken in completing the Historical Resources Assessment Report, which serves as the basis for this section of the Draft EIR, are listed below.

- A review of the existing properties within the Project Site.
- A review of any previous evaluations of Project Site properties through historic survey or other official action.
- Analysis and evaluation of any potential historical resources within a one block radius of the Project Site.
- Review of the required consideration of historical resources under CEQA.
- The following documents related to the Project Site’s development were consulted:

⁴ Pub. Res. Code § 21084.1; CEQA Guidelines § 15064.5

- Historic permits and assessor records for properties within the Project Site
- Sanborn Fire Insurance maps
- Historic photographs, aerial photos and local histories
- California State Historical Resources Inventory for Los Angeles County
- Department of Parks and Recreation Historical Resources Inventory Forms
- Community Redevelopment Agency Historic Survey Matrix
- SurveyLA Eligibility Requirements

c. Analysis of the Modified Alternative 2

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

i. Impacts to Resources Within the Project Site

1. Yucca Argyle Apartments, 6210-6218 and 6220-6224 Yucca Street and 1756-1760 North Argyle Avenue

The Yucca Argyle Apartment complex has poor integrity and does not meet the threshold for listing as a historical resource under any of the applicable federal, state, or local criteria, and is not considered a historical resource pursuant to CEQA.⁵ Therefore, similar to the Project, the Modified Alternative 2 would not have a significant impact on a historical resource with respect to the proposed removal of the Yucca Argyle Apartments, and no further evaluation is required for compliance with CEQA.

2. 1765-1767 and 1771 North Vista Del Mar Avenue/ Vista del Mar/Carlos Historic District

As discussed above, substantial alterations have materially impaired the integrity and significance of the residences at 1765-1767 and 1771 North Vista Del Mar Avenue such that they do not meet the criteria for federal, State, or local eligibility as individual resources or as contributors to the Vista del Mar/Carlos Historic District. The Project's 3-story, 13-unit Building 2 proposed along Vista Del Mar Avenue (within the East Parcels) would not be constructed under the Modified Alternative 2. While 1765-1767 and 1771 North Vista Del Mar Avenue would be demolished under the Project for construction of Building 2, the Modified Alternative 2 would retain 1765-1767 and 1771 North Vista Del Mar Avenue. Under the Modified Alternative 2, the existing single-family residence at 1771 Vista Del Mar would be retained as is, unchanged. Under the Modified Alternative 2, the three residences that currently comprise 1765-1767 Vista Del Mar (duplex plus 1 studio apartment over garage = 3 units), would be returned to a single-family residence, involving reconfiguration of the interior of the building, only, and no exterior changes.

Under the Modified Alternative 2, a 2,820-square-foot publicly accessible park would be constructed at the corner of Vista Del Mar Avenue and Yucca Street. The park would replace the existing fenced and paved parking lot

⁵ See Appendix D, Historical Resource Assessment and Historical Resources Peer Review Report.

currently occupying that location and would be available for use by the surrounding neighborhood. The proposed park would include passive park facilities (i.e., common open space and landscaped areas with sitting areas shaded by trees) serving the local neighborhood. The parking lot has not been identified as a contributor in the Vista del Mar/Carlos District. Under the Modified Alternative 2, the proposed park would provide a landscaped open space at the north entrance to the district that would be compatible with the characteristics of the district including its landscaped residential setbacks and tree-lined streets, and the proposed park would also provide a buffer between the district and the surrounding built environment to the north and west. The construction of the proposed park under the Modified Alternative 2 would not physically impact any identified historical resources, it would be compatible with the district's character, it would visually and physically enhance the district, and it would protect the integrity of the Vista del Mar/Carlos District; therefore, the proposed park would have no adverse impact on the Vista del Mar/Carlos District.

In comparison to the Project, which would demolish 1765-1767 and 1771 North Vista Del Mar Avenue in order to construction the Project's 3-story, 13-unit Building 2, the Modified Alternative 2 would retain both 1765-1767 and 1771 North Vista Del Mar Avenue, and would not construct the Project's Building 2. The Modified Alternative 2's proposed park would provide a landscaped open space at the north entrance to the district that would be compatible with the characteristics of the district and provide a buffer between the district and the surrounding built environment that would protect the integrity of the district. Accordingly, the Modified Alternative 2 would have no adverse impact on the Vista del Mar/Carlos Historic District as a whole, 1765-1767 and 1771 North Vista Del Mar Avenue, or any other contributing historical resources within the district.

ii. Impacts to Resources in the Project Site Vicinity

Indirect impacts of the Modified Alternative 2 as compared with Project were also analyzed. As evaluated in the Historical Resources Assessment Report (Chapter V, Section B, Part 3, Impacts Analysis Using Los Angeles CEQA Thresholds), there are seven (7) historical resources in the Project Site vicinity identified above that would have views of the Project; however, changes to the setting caused by the Project would have no effect on the listing eligibility of these resources. Based upon survey and review of existing conditions, the predominant character within the Project Site vicinity is made up of mixed commercial low-rise to high-rise developments and residential single-family low-rise to multi-family high-rise developments of varying densities, heights, footprints and architectural styles that span from the 1900s to the 2000s, including two recent tower projects located adjacent to the Project Site. As explained below, similar to the Project, the Modified Alternative 2 would not alter the setting of any of the seven (7) historical resources located in the Project Site vicinity in a manner that would materially impair the historical significance or integrity of any of them.

In comparison to the Project, which includes a 20-story tower (Building 1) at the western portion of the Project Site, the Modified Alternative 2 would reduce the bulk and massing of Building 1 while at the same time increasing its scale. Under the Modified Alternative 2, Building 1 would be developed with a narrower east/west profile than the Project and would increase the building height from 20 stories (255 feet) under the Project, to 30 stories (348 feet to the top of the parapet) under the Modified Alternative 2. Under the Modified Alternative 2, the Modified Alternative 2's high-rise component's dimension would be approximately 80 feet x 180 feet, as compared to the Project's high-rise component's dimension of 80 feet x approximately 257 feet. This reduction would occur along the east/west axis, thus reducing the high-rise profile as viewed from the north from Yucca Street and from the south. This reduction would also allow for a greater setback of the high-rise component from Vista Del Mar Avenue. As such, the Modified Alternative 2 would have an east/west dimension of approximately 180 feet. By

comparison, the east/west dimension of the Project's 20-story tower would be approximately 257 feet. The north/south dimension of the high-rise component would be 80 feet, similar to the Project. Like the Project, the scale and massing of the Modified Alternative 2 would alter the visual context of nearby resources, such as the Vista del Mar/Carlos Historic District, the site of the former Little Country Church of Hollywood, Capitol Records Building, Pantages Theatre, Hollywood Equitable Building, Hollywood Boulevard Commercial and Entertainment District, and the Hollywood Walk of Fame. However, the historic settings for these resources have already been altered by changes and redevelopment in the area after the period of significance of these resources, including, without limitation, the construction of the Yucca Argyle Apartments in 1953 and the Hollywood Freeway completed by the late 40s and early 50s to the northeast of the Project Site. Neither the Project nor the Modified Alternative 2 would physically alter any previously identified historical resources in the Project Site vicinity or alter the contributing setting of any nearby historical resources. Similar to the Project, the Modified Alternative 2 would have no adverse impacts to resources in the Project vicinity.

1. Vista del Mar/Carlos Historic District

Like the Project, the Modified Alternative 2 would have a less than significant indirect impact to the adjacent Vista del Mar/Carlos Historic District. Similar to the Project, the contemporary design and materials of the Modified Alternative 2 would be differentiated from the historic styles and materials of the residences in the Vista del Mar/Carlos Historic District. Similar to the Project (20-story tower), the scale of the Modified Alternative 2's Building 1 (30-story tower) is a large contrast to the low-scale, one- and two-story residences in the Vista del Mar/Carlos Historic District. However, in contrast to the Project, as discussed above, the bulk and massing of the Modified Alternative 2's Building 1 would be reduced as compared to the bulk and massing of the Project's Building 1, although the scale of the Modified Alternative 2's Building 1 would increase as compared to the Project's Building 1. The Modified Alternative 2 would also increase setbacks, open space and green space as compared to the Project, would not construct a second building (Building 2) in the district, and would thus eliminate the Project's proposed physical intrusion into the district. Therefore, while similar to the Project, because of the Modified Alternative 2's reduction in mass and bulk and increased setbacks, and introduction of a community park, the Modified Alternative 2 would be more compatible with the district than the Project, with regard to massing, size and location, and would better protect the historic integrity of the district and its environment. As a result, the Modified Alternative 2 would better align with the Secretary of the Interior's Standards for Rehabilitation than the Project.⁶ In addition, if removed in the future, the essential form and integrity of the existing Vista del Mar/Carlos Historic District would be unimpaired. The Modified Alternative 2's alignment with Standards 9 (compatibility) and 10 (reversibility) of the Secretary of the Interior's Standards for Rehabilitation further substantiates the conclusion that the Modified Alternative 2's impacts on the Vista del Mar/Carlos Historic District would be less than significant under CEQA.

2. Little Country Church of Hollywood

Abutting the southern end of the Project Site is the Little Country Church of Hollywood (HCM No. 567), which was designated in 1992. Following the designation of the Little Country Church of Hollywood, the church was destroyed in a fire and no longer exists (burned remnants were removed from the site). However, the property remains listed as a HCM. Similar to the Project, the Modified Alternative 2 would be located directly adjacent to (north of) the Little Country Church of Hollywood property, and the Modified Alternative 2 it would not materially

⁶ U.S. Dept. of Interior, The Secretary of Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating and Reconstructing Historic Buildings (2017), at p. 76.

impair its already diminished integrity. As such, the Modified Alternative 2 would not result in the de-listing of the building, and no adverse impact to the property would occur.

3. Capitol Records Building

The Capitol Records Building, a designated HCM, has a view of the Project Site. However, the Argyle House project, now complete and located at 6230 Yucca Street, would block the current views between the Capitol Records Building and the Project Site. While the Project Site is located across the street from the Capitol Records Building, the immediate surroundings of the Capitol Records Building on its immediate block would not be impacted. Furthermore, similar to the Project, the Modified Alternative 2 would not block any of the Capitol Records Building's notable views along Vine Street or Hollywood Boulevard, and would minimally block non-focal views from the Hollywood Freeway. As discussed above, the bulk and massing of Building 1 would be reduced under the Modified Alternative 2 as compared to the Project, while the scale (height) would be increased under the Modified Alternative 2 as compared to the Project. The aesthetics and visual resources analysis presented in Section IV.A, *Aesthetics*, of this Draft EIR, describes the Project's potential impairment of views of the Capitol Records Building in depth and recognizes the Project would not block any valued views of the Capitol Records Building. Because of its location, design, massing and scale, the potential impacts of the Modified Alternative 2 would be similar to the Project, and therefore, the aesthetics and visual analysis results for the Modified Alternative 2 would be similar to the Project. Additionally, neither the Project nor the Modified Alternative 2 would have a significant direct impact or affect the integrity of location, design, materials, workmanship, feeling, association, or setting of the Capitol Records Building. Neither the Project nor the Modified Alternative 2 would materially impair the integrity, immediate surroundings or significance of the Capitol Records Building that would make the building ineligible for listing as a historical resource. Therefore, the Modified Alternative 2 would not have a significant indirect impact on this historical resource.

4. Pantages Theatre, Hollywood Equitable Building, Hollywood Boulevard Commercial and Entertainment District, Hollywood Walk of Fame

There are four historical resources with partial views of the Project Site: The Pantages Theatre (LAHCM No. 193), the Hollywood Equitable Building (LAHCM No. 1088), the Hollywood Boulevard Commercial and Entertainment District (National Register District), and the Hollywood Walk of Fame (LAHCM No. 194). These historical resources front onto Hollywood Boulevard, and are oriented away from the Project Site with focal views along Hollywood Boulevard, where views are taken in conjunction with other contributors to the Hollywood Boulevard Commercial and Entertainment District. Within the boundaries of the district, the historic setting of the area has been retained. However, to the north in the vicinity of the Project Site, the original historic setting of the area has been compromised by significant amounts of alteration and infill development over time. As such, neither the Project nor the Modified Alternative 2 would have any significant impact on any of these resources or their contributing contextual settings. Furthermore, neither the Project nor the Modified Alternative 2 would materially impair the integrity of the Pantages Theatre or the Hollywood Equitable Building, both contributors to a National Register-listed district and individually listed at the State and local levels. Both properties face away from the Project Site towards Hollywood Boulevard. While portions of the Hollywood Boulevard Commercial and Entertainment District, and the Hollywood Walk of Fame, would have partial views of the Project Site from a distance, the character of the built environment within these views has been continually altered over time and both the intervening built environment and the current Project Site do not contribute to their eligibility for listing.

Furthermore, neither the Project nor the Modified Alternative 2 would physically impact any contributors in the Hollywood Boulevard Commercial and Entertainment District or adversely affect its historic significance or integrity. Its eligibility as a historic district would not be materially impaired by the Project or the Modified Alternative 2 and therefore the Modified Alternative 2 would not cause a substantial adverse change in the significance of these resources. Therefore, the Modified Alternative 2 would have no significant indirect impact on any of these four historical resources.

As discussed above, the Modified Alternative 2 does not involve construction that would demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site or reduce the integrity or significance of any historical resources adjacent to the Project Site or in the Project Site vicinity. All identified resources would maintain the same level of eligibility as historical resources with the Modified Alternative 2 in place. Therefore, the Modified Alternative 2 would not have any significant impacts on any historical resources within the Project Site or in the Project Site vicinity.

iii. Cumulative Impacts to Historical Resources

Cumulative impacts to historical resources evaluate whether impacts of a Project and related projects, when taken as a whole, would substantially diminish the number of historical resources within the same or similar context or property type. Impacts to historical resources, if any, tend to be site-specific. However, cumulative impacts would occur if a Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same style or property type as those within the Project Site.

Chapter III, *General Description of Environmental Setting*, of the Draft EIR provides a list of related projects that are planned or under construction in the Project area. Of the 137 related project sites, nineteen (19) may have historical resources located on the same site or may impact views of historical resources. These projects are summarized in **Table 1, Summary of Related Projects**.

Similar to the Project, the Modified Alternative 2 together with related projects, would not significantly affect historical resources in the immediate vicinity cumulatively or involve resources that are examples of the same style or property type as those within the Project Site. Of the 19 related projects identified above, only three are located in the immediate vicinity of the Project Site. Related Project 5, the Argyle House project, is located across the street from the Project Site between Argyle Avenue and Vine Street and is a new 18-story residential condominium building. The Argyle House project would block secondary views of the Capitol Records Building at the intersection of Yucca and Argyle. However, the view from this intersection is not considered a valued vantage point. Views of the Capitol Records Building become available and primary as the viewer moves to the west along Yucca Street, away from the Project Site and the Argyle House project. Accordingly, the Argyle House project and the construction of the Modified Alternative 2 would not have any impact on protected views of the historic Capitol Records Building. Furthermore, views of the Capitol Records Building would remain primary along Argyle Avenue and the Hollywood Freeway. Therefore, the two projects would not cumulatively alter primary views of a historical resource.

TABLE 1
SUMMARY OF RELATED PROJECTS

Related Project No.	Description	HCM or CHR Status Codes
Related Project 4:	Sunset Bronson Studios, 5800 W. Sunset Boulevard. Location of the Executive Office Building, built in 1923, listed in the National Register	CHR Status Code 1S
Related Project 5:	Argyle House, 6230 Yucca Street. Construction of a new 18-story residential condominium that may impact the setting. No historical resources are being removed or altered as a part of this project.	N/A
Related Project 16:	Hotel Argyle, 1800 N. Argyle Avenue. Construction of a new 15-story hotel that may impact the setting. No historical resources are being removed or altered as a part of this project.	N/A
Related Project 19:	Hotel & Restaurant Project, 6381 W. Hollywood Boulevard. Location of the Security Trust and Savings Bank, built in 1920, and listed in the National Register and the California Register as a contributor to a district.	CHR Status Code 1D
Related Project 21:	Hollywood Center Studios, 6601 W. Romaine Street. Location of a Streamline Moderne style commercial building, built in 1937.	Appears eligible at the local level but has not been formally evaluated
Related Project 23:	Hudson Building, 6523 W. Hollywood Boulevard. Location of the Holly Cinema, built in 1920, and listed in the National Register and the California Register as a contributor to a district.	CHR Status Code 1D
Related Project 26:	Restaurant and Deli, 5500 W. Hollywood Boulevard. Location of a historic property built in 1928, Hollywood Western Building, which is individually eligible for the National Register and listed in the California Register.	CHR Status Code 2S2
Related Project 29:	Millennium Hollywood Mixed-Use Project, 1740 N. Vine Street. Location of a historic property built in 1956, Capitol Records Building.	HCM No. 857
Related Project 36	Columbia Square Mixed-Use, 6121 Sunset Boulevard. Location of Columbia Square, CBS, KNXT, built in 1937, which is eligible for listing in the National Register.	CHR Status Code 3S
Related Project 42:	Ametron, 1546 N. Argyle Avenue. Location of Famous Players-Lasky Studio Film Laboratory built in 1923, which appears individually eligible for listing in the California Register.	CHR Status Code 3CS
Related Project 45:	Hollywood Palladium Residences Project, 6201 W. Sunset Boulevard. Location of a Hollywood Palladium built in 1940, which appears eligible for listing in National Register.	CHR Status Code 3S
Related Project 49:	6250 Sunset (Nickelodeon) Project, 6250 W. Sunset Boulevard. Location of a historic property built at 6230 Sunset Boulevard in 1938, Earl Carroll Theater, which appears eligible for local and State listing.	CHR Status Code 5S3, 3S
Related Project 53:	1717 Bronson Avenue Apartments, 1717 N. Bronson Avenue. Location of a historic property built in 1904, which appears individually eligible for listing in the National Register.	CHR Status Code 3S
Related Project 61:	Academy Square, 1341 Vine Street, Location of a historic property built in 1962 that was identified in a reconnaissance survey but not evaluated.	CHR Status Code 7R
Related Project 75:	Retail & Office Building, 6904 W Hollywood Boulevard. Built in 1920, the property is a contributor to Hollywood Boulevard	CHR Status Code 5S1 and 1D

TABLE 1
SUMMARY OF RELATED PROJECTS

Related Project No.	Description	HCM or CHR Status Codes
	Commercial and Entertainment District, a listed National Register District, that is also locally eligible.	
Related Project 78:	Apartments, 7046 W Hollywood Boulevard. Location of the Hollywood Professional building built in 1925, which is listed as HCM No. 876 on June 5, 2007 and contributor to Hollywood Blvd Commercial & Entertainment District, a listed National Register District that is also locally eligible.	CHR Status Codes 5S1 and 1D
Related Project 84:	John Anson Ford Theater, 2580 Cahuenga Boulevard. Location Hollywood Pilgrimage Memorial Monument erected in 1923 and listed as HCM No. 617 on July 25, 1999.	CHR Status Code 5S1
Related Project 117:	Hollywood & Wilcox, 6430-6440 W Hollywood Boulevard. Location of the Attie Building, which is one of 63 contributors to the Hollywood Boulevard Commercial and Entertainment District, a National Register District.	CHR Status Code 1D
Related Project 125:	Montecito Senior Housing, 6650 W Franklin Avenue. Location of "The Montecito," which is listed in the National Register and California Register, constructed in 1931 and currently operated as an affordable senior living facility.	CHR Status Code 1S

SOURCE: ESA, 2020.

Two other related projects in the immediate vicinity of the Project Site include the 15-story Kimpton Everly Hotel (formerly called the Hotel Argyle) at the northeast intersection of Yucca Street and Argyle Avenue, and the Millennium Hollywood Mixed-Use Project southwest of the intersection of Yucca Street and Argyle Avenue. While construction of the Kimpton Everly Hotel and Millennium Hollywood Mixed-Use Project (now called the Hollywood Center project) are not demolishing or altering any historical resources, the projects anticipate introducing improvements with greater densities on their respective sites. While both of these projects may block views of the Capitol Records Building, they would not create a cumulative effect in conjunction with the Modified Alternative 2 because the Project Site does not provide views of the Capitol Records Building from any valued vantage points, and the views of the Capitol Records Building that it does provide would be blocked by the Argyle House project, which is closer to the Capital Records Building than the Project Site is, as discussed above. The cumulative impact on views of the Capitol Records Building as a result of the Kimpton Everly Hotel and Millennium Hollywood Mixed-Use Project would not have any impact on the setting of the Capitol Records Building and would not involve any blockage of views of the building from any valued vantage points. Following implementation of the Modified Alternative 2, adjacent historical resources would retain their eligibility for historic designation and, for the above-stated reasons, the Modified Alternative 2's contribution to cumulative impacts in light of the Argyle House, Kimpton Everly Hotel, and Millennium Hollywood Mixed-Use projects would not be cumulatively considerable. Accordingly, the cumulative impact of the Modified Alternative 2 on surrounding historical resources would be less than significant.

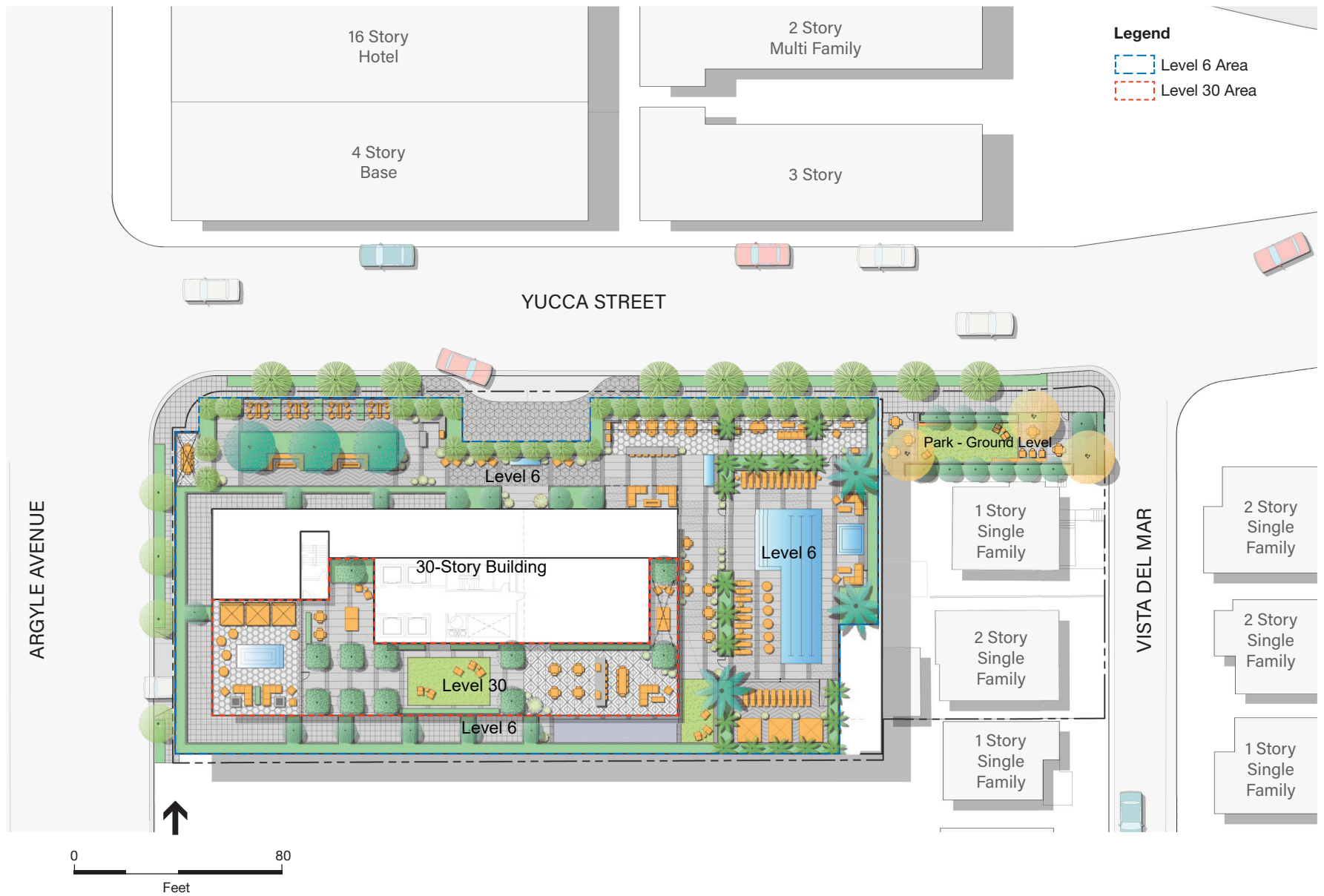
The other 16 related projects are located at minimum distances ranging from approximately 1,380 feet (Related Project 19, 6381 W. Hollywood Boulevard) to 5,905 feet (Related Project 21, 6601 W. Romaine Street) from the Project Site, isolated by intervening development and located in a number of locations of varying character and context. Similar to the Project, the change in visual character within the Hollywood Community, as further described in Chapter IV.A, *Aesthetics*, of the Draft EIR, the Modified Alternative 2, in combination with related projects, would not block notable focal or panoramic views within the Hollywood Community. Additionally, no

related projects involve resources that are examples of the early twentieth century residential architecture; instead, the majority of the historical resources being affected by the related projects are commercial properties.

Further, as previously stated, the Modified Alternative 2 would have a less-than-significant impact on historical resources. **Therefore, the Modified Alternative 2 would not result in a cumulatively considerable contribution to significant cumulative impacts, and its cumulative impact on historical resources would be less than significant.**

Attachments

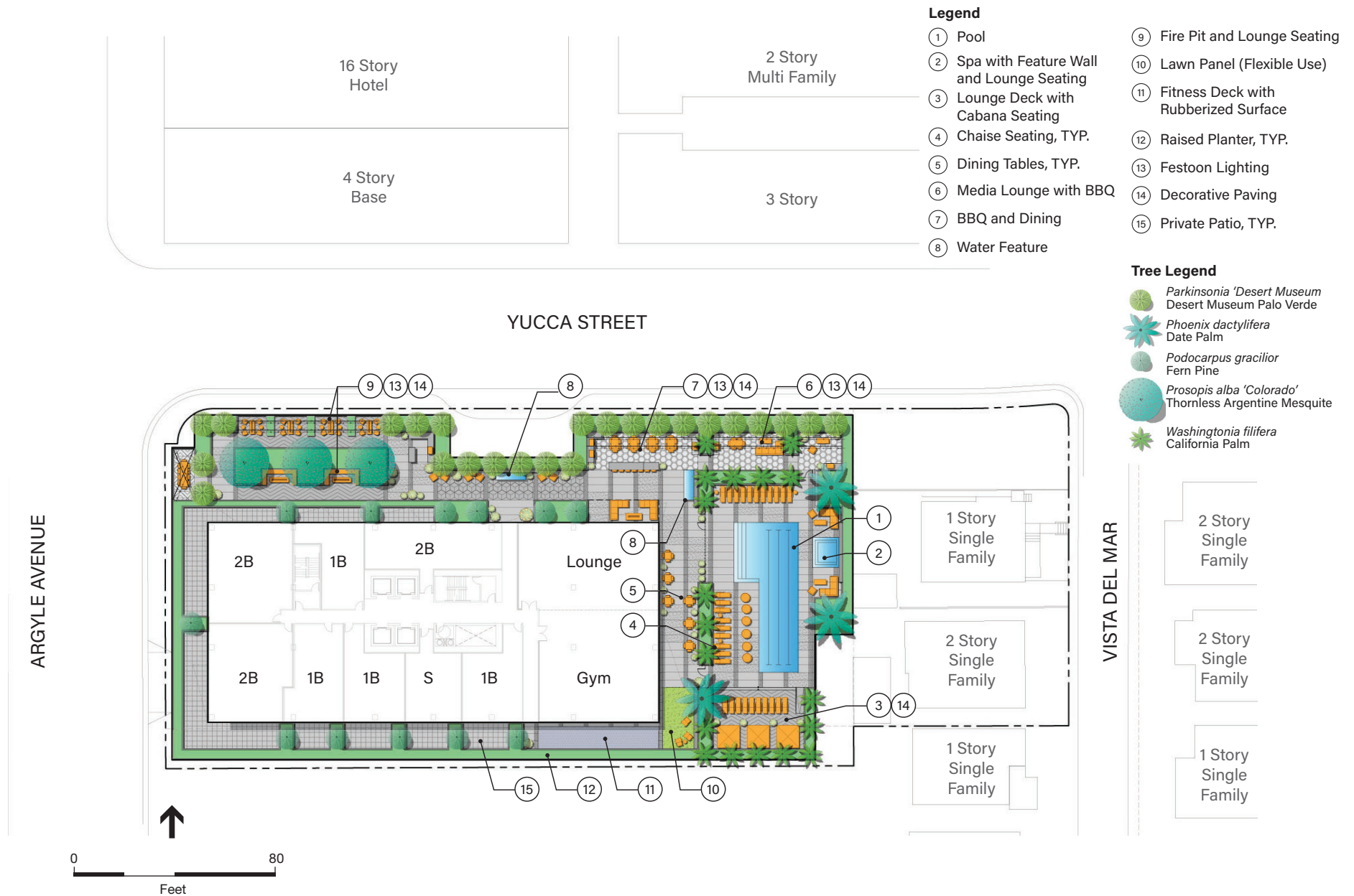
- Figure 3-1, Conceptual Site Plan – Modified Alternative 2
- Figure 3-2, Level 6 Plan – Modified Alternative 2
- Figure 3-3, Level 30 Plan – Modified Alternative 2
- Figure 3-4, East/West Building Section – Modified Alternative 2
- Figure 3-5, North Elevation – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project

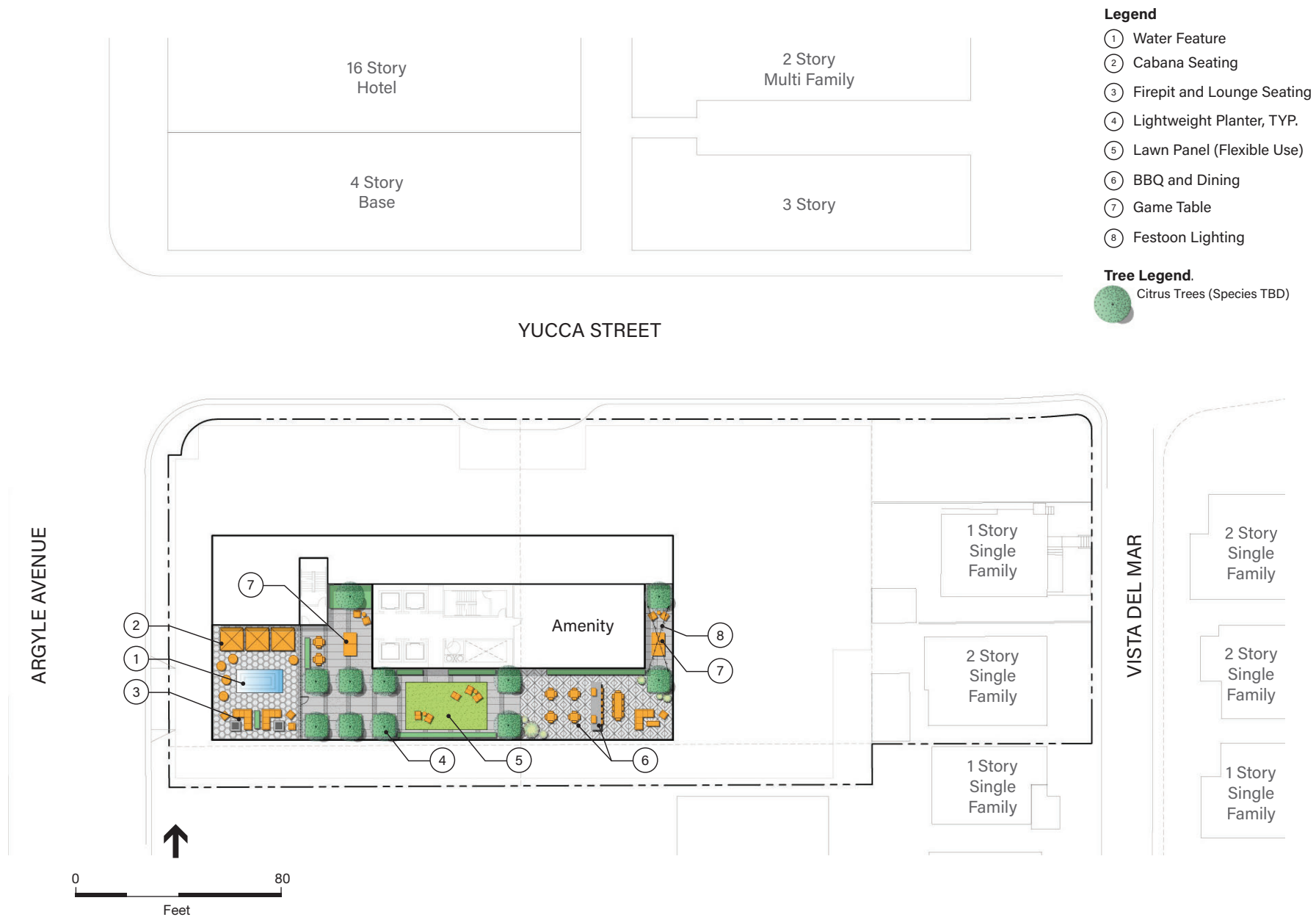
Figure 3-1
Conceptual Site Plan – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project

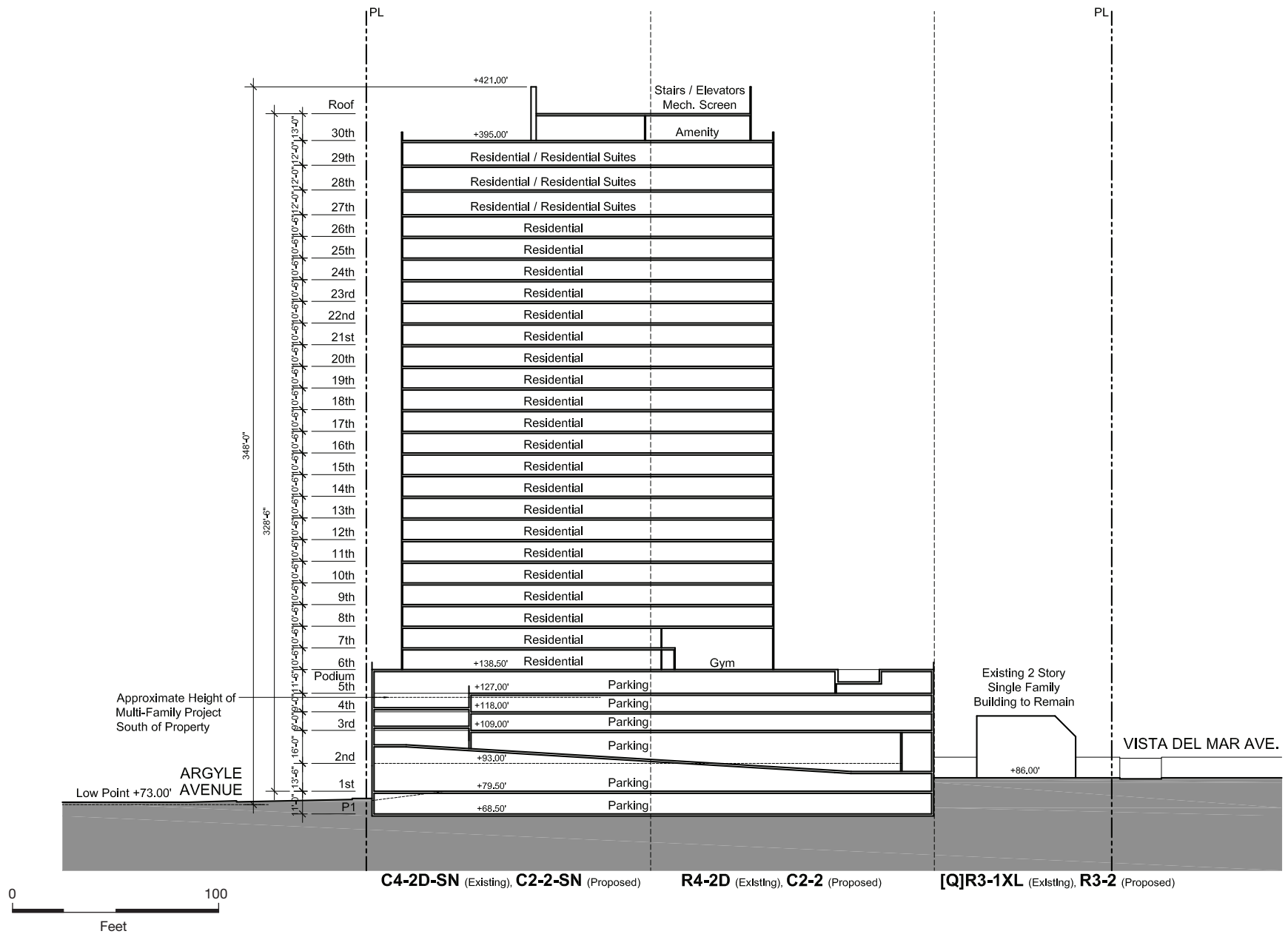
Figure 3-2
Level 6 Plan – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

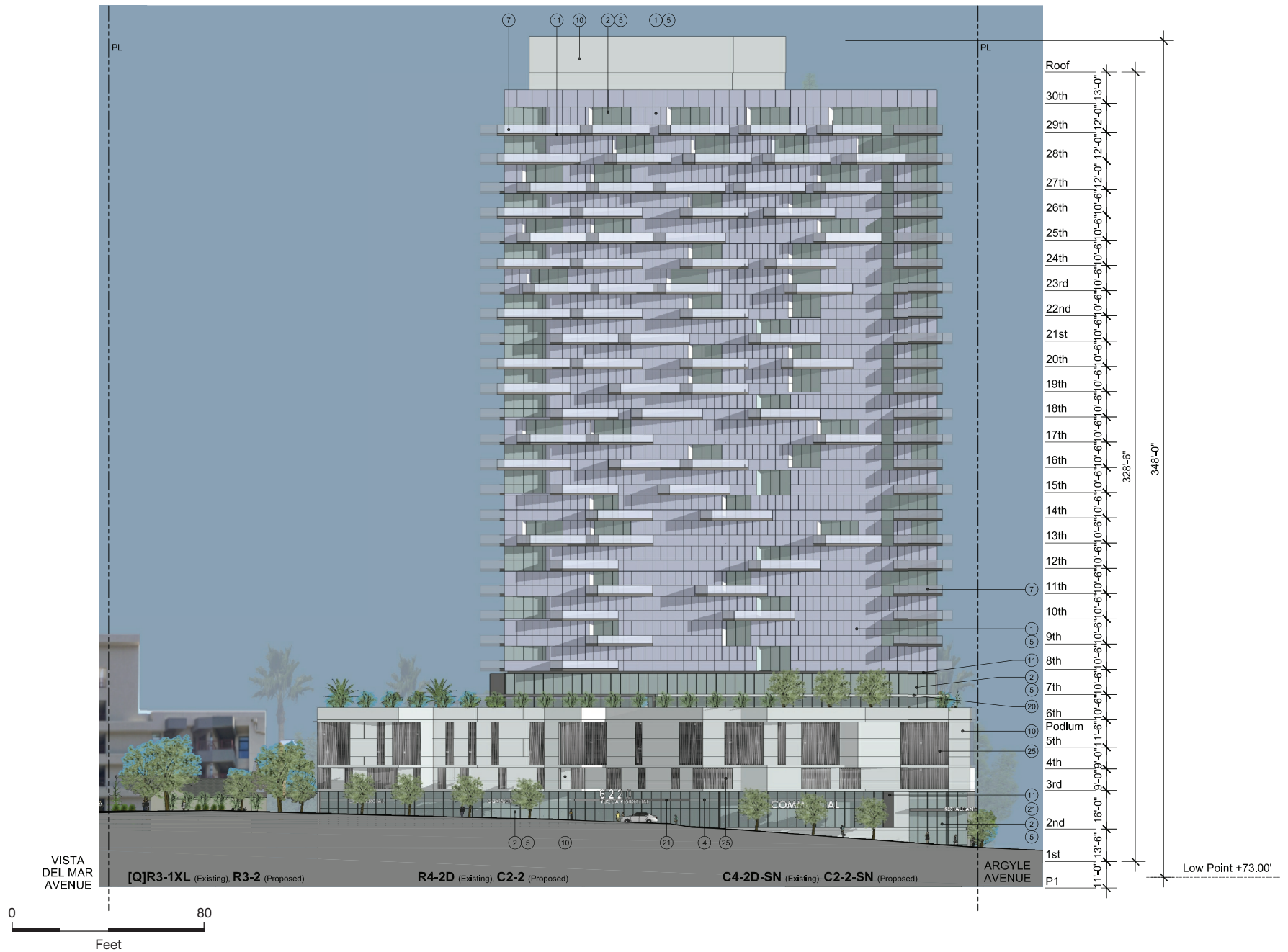
6220 West Yucca Project

Figure 3-3
Level 30 Plan – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project
Figure 3-4
 East/West Building Section – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project

Figure 3-5
North Elevation – Modified Alternative 2

