

## **IV. Environmental Impact Analysis**

---

### **C. Cultural Resources**

#### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project's potential impacts on cultural resources, including historic resources, archaeological resources, and human remains. This section is based in part on the *1718 N. Vine Street, Los Angeles, California, Historical Resource Report* (Historical Resource Report) prepared by GPA Consulting (May 2018) included as Appendix C.1 of this Draft EIR. The analysis of potential impacts to archaeological resources is based on a records search included as Appendix C.2 of this Draft EIR, as well as a review of previous, existing, and proposed on-site conditions.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) Historic Resources**

Historic resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historic resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, state, and local laws governing and influencing the preservation of historic resources of national, state, regional, and local significance include the National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); National Register of Historic Places (National Register); the California Register of Historical Resources (California Register); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171 *et seq.*), all of which are summarized below.

###### *(a) National Register of Historic Places*

The National Register was established by the NHPA 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.”<sup>1</sup> Under the administration of the National Park Service (NPS), the National Register recognizes properties that are significant at the national, state, and/or local levels.

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 Code of Federal Regulations, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history; or
- B. It is associated with the lives of persons significant in our past; or
- C. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. It yields, or may be likely to yield, information important in prehistory or history.<sup>2</sup>

In addition to meeting one or more of the above criteria, district sites, buildings, structures, and objects that are 50 years in age must also retain enough historic integrity to be eligible for listing. Historic integrity is defined as “the ability of a property to convey its significance” and “the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”<sup>3,4</sup> NPS has identified seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. *Location* is the place where the historic property was constructed or the place where the historic event occurred. *Design* is the combination of elements that create the form, plan, space, structure, and style of a property. *Setting* is the physical environment of a historic property. *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. *Materials* are the physical elements that were combined or deposited during a particular period of time

---

<sup>1</sup> 36 Code of Federal Regulations 60, Section 60.2.

<sup>2</sup> 36 Code of Federal Regulations 60, Section 60.4.

<sup>3</sup> U.S. Department of the Interior, National Park Service, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, pg. 44.

<sup>4</sup> U.S. Department of the Interior, National Park Service, National Register Bulletin 16A: How to Complete the National Register Registration Form, pg. 4.

and in a particular pattern or configuration to form a historic property. *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time. *Association* is the direct link between an important historic event or person and a historic property.<sup>5</sup> To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when a property is significant.

*(b) Secretary of the Interior's Standards*

Projects that may affect historic resources are considered to be mitigated to a less-than-significant level if they are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards. NPS issued the Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. Although none of the four treatments as a whole applies specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Standards for Rehabilitation provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

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

---

<sup>5</sup> U.S. Department of Interior, National Park Service. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington, DC: National Park Service, 1995.

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

It is important to note that the Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

*(c) California Register of Historical Resources*

The California Register is similar to the National Register program. The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP).

The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify the State's historic and archaeological resources and indicate what properties are to be protected, to the extent prudent and feasible, from

substantial adverse change.<sup>6</sup> State law provides that in order for a property to be considered eligible for listing in the California Register, it must be significant under any of the following four criteria identified by OHP, which parallel National Register criteria.<sup>7</sup> A property is eligible if it:

1. 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;
2. Is associated with the lives of persons important to local, California, or national history;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or,
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

An historic resource eligible for listing in the California Register must meet one or more of the significance criteria described above and retain enough of its historic character or appearance to be recognizable as an historic resource and to convey the reasons for its significance. As described above, integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. Unlike the National Register, the California Register does not exclude resources less than 50 years of age. California Register regulations contained in Title 14, Division 3, Chapter 11.5 of the California Code of Regulations (CCR) include Section 4852(c), which provides that “it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register.” According to Section 4852(d), a resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

The California Register also includes properties that: (1) have been formally determined eligible for listing in, or are listed in, the National Register; (2) are registered State Historical Landmark Number 770, and all consecutively numbered landmarks above

---

<sup>6</sup> *California Public Resources Code, Section 5024.1(a).*

<sup>7</sup> *California State Parks, Office of Historic Preservation, California Register of Historical Resources, [http://ohp.parks.ca.gov/?page\\_id=21238](http://ohp.parks.ca.gov/?page_id=21238), accessed June 4, 2019.*

Number 770; or (3) are points of historical interest, which have been reviewed by the California OHP and recommended for listing by the State Historical Resources Commission. Resources that may be nominated for listing in the California Register include: individual historical resources; historical resources contributing to the significance of an historic district; historical resources identified as significant in historical resources surveys; historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts; and local landmarks.<sup>8</sup>

With regard to properties identified during historical resource surveys, the survey must meet all of the following criteria:<sup>9</sup>

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [OHP] procedures and requirements;
3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

*(d) California Environmental Quality Act*

For purposes of CEQA, Public Resources Code (PRC) Section 21084.1 defines an historical resource as:

*[A] resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The*

---

<sup>8</sup> California Public Resources Code, Section 5024.1(e).

<sup>9</sup> California Public Resources Code Section 5024.1(g).

*fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource.*

CEQA Guidelines Section 15064.5(a)(3) also provides additional guidance on this subject:

*[A]ny object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California may be considered to be 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 the resource meets the criteria for listing on the California Register of Historical Resources.*

*(e) City of Los Angeles Cultural Heritage Ordinance*

The City's Cultural Heritage Ordinance, originally adopted by the Los Angeles City Council in 1962 (sections 22.171 *et seq.* of the Los Angeles Administrative Code), created the City's Cultural Heritage Commission and established criteria for designating City of Los Angeles Historic-Cultural Monuments (HCMs). Section 22.171.7 of the Los Angeles Administrative Code defines the criteria for designation as any site, building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites that:

1. Reflect or exemplify the broad cultural, political, economic, or social history of the nation, state, or community; or
2. Are identified with historic personages or with important events in national, state, or local history; or
3. Embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style, or method of construction; or
4. Are a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.<sup>10</sup>

---

<sup>10</sup> *Cultural Heritage Ordinance: Section 22.171 et seq. of the City of Los Angeles Administrative Code.*

Designation recognizes the unique historical, cultural, or architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for HCM status. Buildings may be eligible for HCM status if they meet at least one of the criteria in the Cultural Heritage Ordinance and retain their historic design characteristics and materials. Unlike the National and California Registers, the Cultural Heritage Ordinance does not require properties to reach a minimum age requirement and does not identify concepts such as physical integrity or period of significance. However, although the City does not require that a resource be a certain age before it can be designated, the City of Los Angeles Department of City Planning's (DCP) Office of Historic Resources (OHR) does qualify that "enough time needs to have passed since the resource's completion to provide sufficient perspective that would allow an evaluation of its significant within a historical context."<sup>11</sup>

The City of Los Angeles also recognizes historic districts as Historic Preservation Overlay Zones (HPOZs).<sup>12</sup> The HPOZ is a planning tool that adds a level of protection to an area by creating a review board to evaluate proposals for alterations, demolitions, or new construction. An HPOZ is intended to include a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Contributing resources must meet at least one of the following criteria:<sup>13</sup>

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 a historic place or area of historic interest in the City.

*(f) City of Los Angeles Historic Resources Survey (SurveyLA)*

The Los Angeles Historic Resources Survey, or SurveyLA, is conducted under the DCP's OHR. SurveyLA is the City's comprehensive program to identify and document

---

<sup>11</sup> *City of Los Angeles, Department of City Planning, Office of Historic Resources, Historic-Cultural Monuments, Frequently Asked Questions (FAQs), <http://preservation.lacity.org/commission/frequently-asked-questions-faqs>, accessed June 4, 2019.*

<sup>12</sup> *Los Angeles Municipal Code Section 12.20.3*

<sup>13</sup> *Los Angeles Municipal Code Section 12.20.3.F.3(c).*



potentially significant historic resources. Surveys conducted under SurveyLA cover the period from approximately 1865 to 1980 and include individual resources such as buildings, structures, objects, natural features, and cultural landscapes, as well as areas and districts. Archaeological resources will be included in a future survey phase. Significant resources reflect important themes in the city's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys commenced in 2010, were undertaken in phases by Community Plan Area, and were completed in 2016.<sup>14</sup> SurveyLA findings are currently being published at HistoricPlacesLA, the City's online information and management system created to inventory, map, and help protect historic resources.<sup>15,16</sup>

As described in detail in the SurveyLA Field Survey Results Master Report, the surveys identify and evaluate properties according to standardized criteria for listing in the National Register, California Register, and for local designation as HCMs and HPOZs. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings. SurveyLA utilizes the Los Angeles Citywide Historic Context Statement (HCS) to provide a framework for identifying and evaluating the City's historic resources. Development of the HCS is ongoing with oversight by OHR.

*(g) City of Los Angeles General Plan*

The City of Los Angeles General Plan includes a Conservation Element. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes a policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the

---

<sup>14</sup> *City of Los Angeles, Department of City Planning, Office of Historic Resources, Field Survey Results Master Report, August 2016. Note that field surveys were not conducted for certain redevelopment project areas where existing historical surveys had been performed, including the Hollywood Redevelopment Project Area, which encompasses the Project Site.*

<sup>15</sup> *City of Los Angeles, Department of City Planning, Office of Historic Resources, SurveyLA, SurveyLA Findings and Reports, <https://preservation.lacity.org/survey-la-findings-and-reports#Survey List>, accessed June 4, 2019.*

<sup>16</sup> *City of Los Angeles, Department of City Planning, Office of Historic Resources, HistoricPlacesLA, [www.historicplacesla.org/index.htm](http://www.historicplacesla.org/index.htm), accessed June 4, 2019.*

related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>17</sup>

The City of Los Angeles General Plan also includes 35 Community Plans that comprise a part of the General Plan's Land Use Element. As discussed in Section IV.G, Land Use, of this Draft EIR, the Project Site is located within the Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following general policy that is relevant to cultural resources:

- It is the City's policy that the Hollywood Community Plan incorporate the sites designated on the Cultural and Historic Monuments Element of the General Plan; furthermore, the Hollywood Plan encourages the addition of suitable sites thereto.

*(h) Hollywood Redevelopment Project/Hollywood Redevelopment Plan*

The Project Site is also located within the Hollywood Redevelopment Project area. The Hollywood Redevelopment Project area was established in 1984 by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The Hollywood Redevelopment Project's goals include "the retention, restoration and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria."<sup>18</sup> Policies and guidelines for the preservation, rehabilitation and retention of historic properties are discussed in Section 511 of the Redevelopment Plan.<sup>19</sup>

As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA/LA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations from historic surveys in 1986, 1997, and 2003 were compiled in a data table that was made available on the CRA/LA website. A more intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2010.<sup>20</sup> It provided relevant information regarding the status of properties

---

<sup>17</sup> *City of Los Angeles General Plan, Conservation Element. September 2001; pages II-4, II-5, and II-8.*

<sup>18</sup> *City of Los Angeles, Hollywood Redevelopment Plan, as first amended in May 2003 and effective July 2003, p. 3.*

<sup>19</sup> *City of Los Angeles, Hollywood Redevelopment Plan, as first amended in May 2003 and effective July 2003, p. 34-36.*

<sup>20</sup> *Community Redevelopment Agency, Historic Resources Survey, Hollywood Redevelopment Project Area, February 2010.*

within the redevelopment area and is used by agencies and the community to identify potential historic resources.

## (2) Archaeological Resources

Federal, state, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Environmental Policy Act (NEPA), National Historic Preservation Act, and CEQA are the basic federal and state laws governing the preservation of historic and archaeological resources of national, regional, state, and local significance. As archaeological resources are also considered historic resources, regulations applicable to historic resources are also applicable to archaeological resources. Whereas federal agencies must follow federal archaeological regulations, most projects by private developers and landowners do not require this level of compliance. Thus, as the Project would not require a federal permit and would not use federal money, federal archaeological regulations are not applicable to the Project.

### *(a) California Environmental Quality Act*

State archaeological regulations affecting the Project include the statutes and guidelines contained in CEQA (PRC Sections 21083.2 and Section 21084.1) and the CEQA Guidelines (CCR, Title 14, Section 15064.5). CEQA requires lead agencies to carefully consider the potential effects of a project on archaeological resources. Several agency publications, including the technical assistance bulletins produced by OHP, provide guidance regarding procedures to identify such resources, evaluate their importance, and estimate potential effects.

CEQA recognizes that archaeological resources are part of the environment, and a project that “may cause a substantial adverse change in the significance of an historical resource [including archaeological resources] is a project that may have a significant effect on the environment” (PRC Section 21084.1). For purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the California Register (PRC Section 21084.1). Refer to the previous discussion in this section regarding the California Register for a list of the criteria used to determine whether a resource is eligible for listing in the California Register and is, therefore, considered a historical resource under CEQA.

Archaeologists assess sites based on all four criteria but usually focus on the fourth criterion previously provided, which is whether the resource “[h]as yielded, or may be likely to yield, information important in prehistory or history.” The CCR also provides that cultural resources of local significance are eligible for listing in the California Register (CCR, Title 14, Section 4852).

In addition to archaeological resources that qualify as historical resources, CEQA requires consideration of project impacts to unique archaeological resources, defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person [PRC Section 21083.2(g)].

In addition to having significance in accordance with the applicable criteria, resources must have integrity for the period of significance. The period of significance is the date or span of time within which notable events transpired at a site, or the period that notable individuals made their important contributions to a site. Integrity is the ability of that property to convey its significance.

With regard to human remains, CEQA Guidelines Section 15064.5 addresses consultation requirements if an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project site. This section of the CEQA Guidelines, as well as Health and Safety Code Section 7050.5 and PRC Section 5097.9, also address treatment of human remains in the event of accidental discovery.

*(b) Los Angeles General Plan Conservation Element*

Section 3 of the Los Angeles General Plan Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>21</sup>

---

<sup>21</sup> *City of Los Angeles General Plan, Conservation Element, September 2001, pp. II-6 through II-9.*

## **b. Existing Conditions**

### **(1) Description of the Project Site**

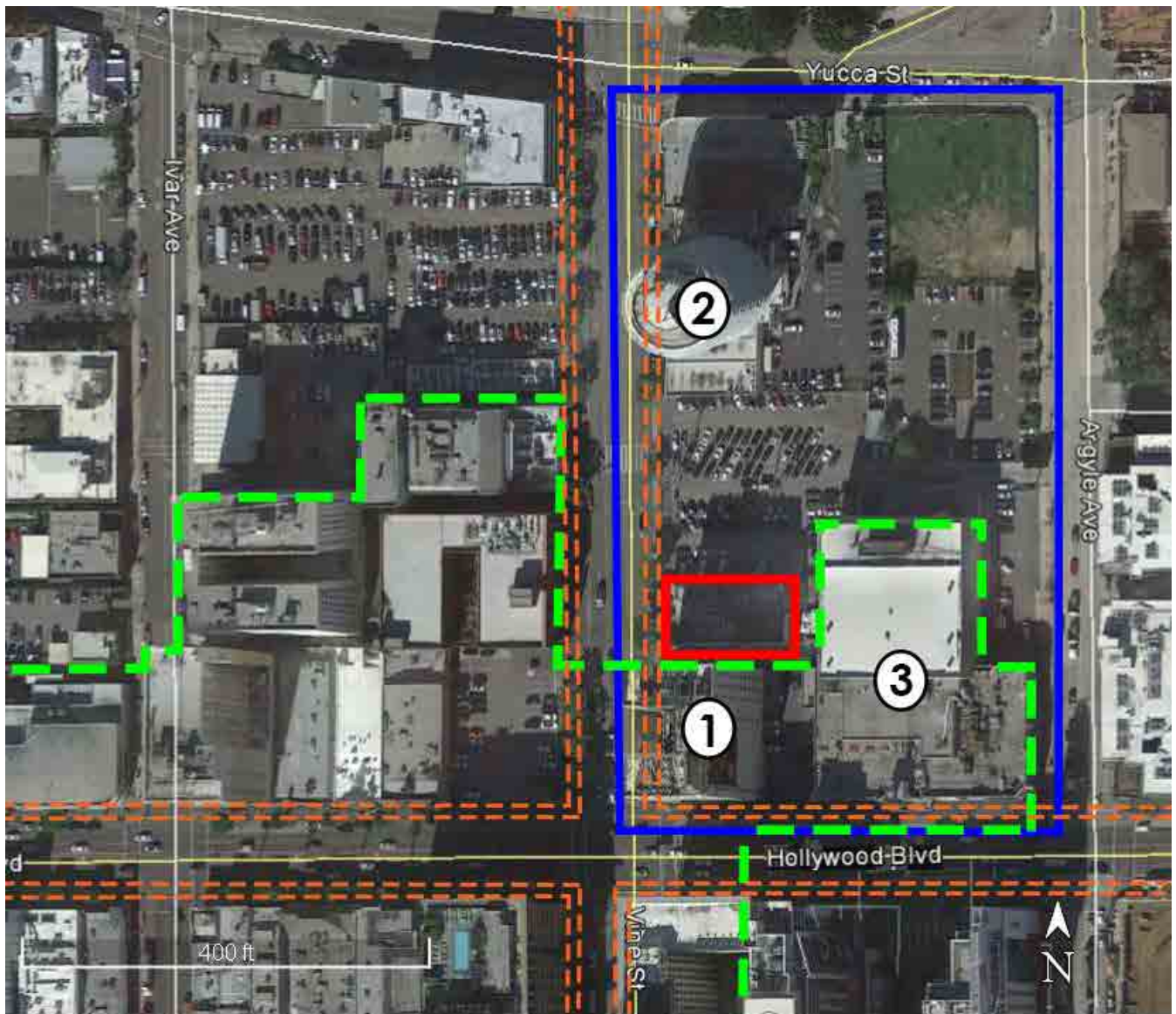
The Project Site is located within the Hollywood community of the City of Los Angeles and is surrounded by a surface parking lot to the north, the 12-story Equitable Building to the south, the Pantages Theatre to the east, and Vine Street to the west. The Project Site is also adjacent to the Hollywood Walk of Fame, which runs along the eastern sidewalk of Vine Street, and to the Hollywood Boulevard Commercial and Entertainment District, which encompasses the Equitable Building and Pantages Theatre, but does not include the Project Site.

A two-story rectangular commercial building, a 15-foot easement area, and a small parking area occupy the Project Site. The existing building was constructed in approximately 1915 and has two interior floors and an outdoor patio on the second floor at the southeast corner. The building has been altered numerous times since its construction and does not appear to have any intact, original features. Changes to the building over time have included window and door replacements, infill of storefronts, changes to the roofline, additions and subsequent removals of additions, installation of new awnings and lighting, and numerous interior remodels. Building permit records also revealed that the building has changed hands and uses many times, and the building was remodeled constantly to suit the needs of new tenants.

As determined in the Historical Resources Report, the existing building does not appear to be a historical resource for the purposes of CEQA. Although the building was constructed in 1915, the building lacks integrity and has no ability to convey any potential significance due to the extent of alterations since its original construction. In addition, the building was not identified as a historical resource in previous surveys of Hollywood, including surveys conducted for the CRA/LA as recently as 2010. Furthermore, the building is not a contributor to the Hollywood Boulevard Commercial and Entertainment District. Therefore, there are no historical resources on the Project Site.

### **(2) Historical Resources in the Project Study Area**

As shown on Figure IV.C-1 on page IV.C-14, the study area for the Historical Resources Report was defined by GPA Consulting as the single block bound by Yucca Street to the north, Hollywood Boulevard to the south, Argyle Avenue to the east, and Vine Street to the west. The Historical Resources Report identified five historical resources within the study area. These resources are described below:



- ① Equitable Bldg
  - ② Capitol Records Bldg
  - ③ Pantages Theatre
- |   |                  |   |                   |
|---|------------------|---|-------------------|
|  | Project Location |  | Historic District |
|  | Study Area       |  | Walk of Fame      |

**Figure IV.C-1**  
Historical Resources within the  
Project Study Area

*(a) Hollywood Boulevard Commercial and Entertainment District*

The Project Site is located just outside of the boundaries of the Hollywood Boulevard Commercial and Entertainment District (Historic District). The Historic District is located in the commercial core of Hollywood and is a 12-block area that generally extends along Hollywood Boulevard from El Cerrito Place to Argyle Avenue, and also includes adjacent blocks on Ivar Avenue, Highland Avenue, and Vine Street. The Historic District was listed on the National Register in 1985 and included 102 buildings. Of the 102 buildings, 59 buildings were identified as contributing to the significance of the Historic District. The vast majority of the contributing buildings were constructed between 1915 and 1939, when Hollywood Boulevard was transformed from a residential street of stately homes to a bustling commercial center of the film industry. While the Historic District is representative of Hollywood's heyday during the 1920s and 1930s, it is characterized by a wide variety of building types and architectural styles. There are two contributing buildings in the study area for the Project: the Equitable Building and the Pantages Theatre. Both are considered individual historical resources, as well, and described separately below.

*(b) Equitable Building*

The Equitable Building is located at 6253 Hollywood Boulevard on the northeast corner of the Hollywood Boulevard and Vine Street, immediately south of the Project Site. The Equitable Building is a contributor to the Historic District and is also considered an individual historical resource due to its designation as Los Angeles Historic-Cultural Monument #1088. The 12-story reinforced concrete building was constructed between 1929 and 1930 and designed by Aleck Curlett in a blend of the Neo-Gothic and Art Deco styles. The building has a two-story rectangular base topped by a U-shaped, ten-story office tower, and displays a strong vertical emphasis through continuous pilasters stretching between window bays. Cast concrete ornament and balconies create variation along the street-facing façades. The building is generally intact, but has sustained alterations to its storefronts. The storefront alterations are minor in comparison with common alterations to similar buildings from the time period.

*(c) Pantages Theatre*

The Pantages Theatre is located at 6233 Hollywood Boulevard on the northwest corner of the Hollywood Boulevard and Argyle Avenue, immediately east of the Project Site and the Equitable Building. The Pantages Theatre is a contributor to the Historic District and is also designated as Los Angeles Historic-Cultural Monument #193. The two- and four-story concrete building was constructed in 1930 and designed by B. Marcus Priteca in the Art Deco style. A large blade sign reading "PANTAGES" in vertical lettering is located above a broad theater marquee near the center of the south elevation along Hollywood Boulevard. The south elevation of the building features ornate detailing in the form of stone reliefs, Egyptian lotus motifs, metal zigzag patterns, and sculptures of goddesses. The

east and west elevations of the theater volume feature thin, cast concrete ornamentation applied to solid concrete walls. The cast concrete is especially ornate on the east elevation, facing Argyle Avenue; in contrast, the west elevation facing the Project Site has very limited ornamentation. The theatre building is generally intact, with the exception of some storefront alterations. The storefront alterations are minor in comparison with common alterations to similar buildings from the time period.

*(d) Capitol Records Building*

The Capital Records Building is located on the east side of Vine Street at 1750 N. Vine Street and sits north of the Project Site separated by a surface parking lot. The building is not located within the Historic District's boundaries; however, both the building and its rooftop sign are designated as Los Angeles Historic-Cultural Monument #857. The 13-story building was designed by Welton Becket and completed in 1956. The reinforced concrete building is an excellent example of both the International Style, with its simple geometry, podium and tower parti, continuous bands of windows, and lightweight aesthetic, and Programmatic architecture, due to its resemblance to a stack of records on a turntable. At the top of the building is a rooftop sign spelling out "CAPITOL RECORDS" in illuminated lettering. The tall spire that forms the needle of the turntable features a flashing light at the top that spells out "HOLLYWOOD" in Morse Code. The building remains substantially intact, especially at its most visible upper stories.

*(e) Hollywood Walk of Fame*

The Hollywood Walk of Fame is 2.3 miles long and lines the north and south sides of Hollywood Boulevard between Gower Street and Sycamore Avenue, and the east and west sides of Vine Street from Yucca Avenue to Sunset Boulevard. It is designated as Los Angeles Historic-Cultural Monument #194. The stars, which are dedicated to individuals in the entertainment industry, consist of charcoal colored terrazzo squares, embedded with coral terrazzo stars outlined in bronze. The portion of the Hollywood Walk of Fame along the Project street frontage includes stars for Mickey Rooney, Al Jolson, and Bebe Daniels, to name a few.

### (3) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. The area surrounding the Project Site is a highly urbanized area and has been subject to disruption throughout the years. On July 15, 2016, a cultural/archaeological resources records search was conducted by the South Central Coastal Information Center (SCCIC), which has been included in Appendix C of this Draft EIR. The results of the record search indicate that a total of 21 cultural resource studies have been conducted within a 0.5-mile radius of the Project Site, five of which included the Project Site. The records search also found that there are no archaeological resources located



within the Project Site and one archaeological resource is located within a 0.5-mile radius of the Project Site. However, according to the recommendations of the SCCIC, the Project Site is potentially sensitive for archaeological resources. Due to the existing development on the Project Site, it is unlikely that an archaeological survey would result in the observation of surface artifacts.

### 3. Project Impacts

#### a. Significance Thresholds

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

***Threshold (a): Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5.***

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

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate cultural resources:

#### (1) Historical Resources

- If the project would result in a substantial adverse change in the significance of an historical resource due to:
  - Demolition of a significant resource;
  - Relocation that does not maintain the integrity and significance of a significant resource;
  - Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or,
  - Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

## (2) Archaeological Resources

- If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:
  - Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
  - Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
  - Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
  - Is at least 100-years-old<sup>22</sup> and possesses substantial stratigraphic integrity; or
  - Involves important research questions that historical research has shown can be answered only with archaeological methods.

### b. Methodology

The Historical Resources Report is based, in part, on historic building permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos, and site plans, as well as review of the National Register and its annual updates, the California Register, the Statewide Historical Resources Inventory (HRI) database maintained by the California Office of Historic Preservation and the California Historical Resources Information System, and the City of Los Angeles's inventory of historic properties to identify any previously recorded properties within or near the Project Site. An intensive pedestrian survey was also undertaken to document the existing conditions of the Project Site and the surrounding vicinity. Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historically significant resource or resources, and if so; (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the resource or resources.

To address potential impacts associated with archaeological resources, a formal records search was conducted to assess the archaeological sensitivity of the Project Site and vicinity. In addition, an evaluation of existing conditions and previous disturbances

---

<sup>22</sup> Although the CEQA criteria state that "important archaeological resources" are those which are at least 100- years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.

within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources.

The State Legislature, in enacting the California Register, also amended CEQA to clarify which properties are considered historical resources, as well as which project impacts are considered to be significantly adverse. A project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

### **c. Project Design Features**

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

### **d. Analysis of Project Impacts**

***Threshold (a): Would the Project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?***

#### **(1) Direct Impacts**

The Project would require the demolition of the existing two-story commercial building. However, as previously discussed, the existing building on the Project Site is not a historical resource. In addition, the five identified historical resources within the study area identified in the Historical Resources Report would not be demolished or physically altered by the Project. However, the Equitable Building and the Pantages Theatre are located in very close proximity to the Project Site. Thus, the Project has the potential to impact these historical resources through the excavation and vibration associated with new construction. Each of these activities could cause damage to the historic buildings if adequate protections are not provided. The Project would implement Mitigation Measure CUL-MM-1, which would require a pre-construction survey by a qualified structural engineer to establish baseline conditions. In addition, Section IV.H, Noise, of this Draft EIR includes Mitigation Measure NOI-MM-2, which would implement a vibration monitoring program during the demolition, excavation, and construction of the proposed subterranean parking garage. These mitigation measures would ensure that potential impacts to historical resources during construction activities would be less than significant.

**Thus, the Project would not cause any change in the significance of a historical resource as defined in Section 15064.5 and direct impacts on historic resources would be less than significant with mitigation.**

## (2) Indirect Impacts

Potential indirect impacts were also analyzed to determine if the Project would result in a substantial material change to the integrity and significance of the identified historical resources or their contributing setting within the Project Site vicinity. Potential indirect impacts to the historical resources in the Project vicinity are summarized below.

### *(a) Hollywood Boulevard Commercial and Entertainment District*

Impacts to the Historic District would occur if the Project would affect its physical integrity to the degree that it would no longer be eligible for listing in the National Register. Such an effect would only occur if the Historic District no longer retained sufficient integrity to convey its significance as the main street of the Hollywood community during the 1920s and 1930s after completion of the Project. Of the seven aspects of integrity, the only relevant aspects with respect to the impact of a new building on an established historic district are setting and feeling. Thus, the analysis of potential impacts on the Historic District considers how the Project would affect the District's integrity of feeling and setting in terms of the relative number, size, scale, design, and location of visual intrusions.

The Project Site is not located within the boundaries of the Historic District and therefore the Project would not affect the number of buildings in the Historic District or the ratio of contributing to non-contributing buildings. Similarly, the Project would have no impact on the relative number of intrusions within the Historic District. The Project Site is located near a section of the Historic District that has a mix of high-rise and low-rise commercial buildings, ranging from two to 12 stories in height. Although the Project is immediately adjacent to the two-story and four-story Pantages Theatre, which is a contributor to the Historic District, the theatre would not share street frontage with the Project. The only contributing building that shares street frontage with the Project is the 12-story Equitable Building. The 13-story building proposed for the Project Site is slightly taller, but is compatible in both size and scale with the Equitable Building, as well as with the other contributors further south on Vine Street, including the 12-story Taft Building and the nine-story Dyas Building. Constructing a new building at the Project Site of similar height to some of the tallest buildings is both appropriate and compatible with this portion of the Historic District. Furthermore, the relatively small footprint of the proposed new building and the narrow width of the Project Site's frontage on Vine Street prevent the Project from overwhelming the nearby contributors. In addition, the contemporary style of the proposed new building is simple, clean, and has an overall lightness due to the extensive use of glass on the Vine Street façade that blends well with the Historic District. Therefore, the Project as currently designed would not have such a significant visual impact that it would impair the integrity of the Historic District as a whole to the degree that it is no longer eligible for the listing in the National Register. The Project would be sufficiently compatible with the Historic District in terms of size, scale, and design.

Lastly, the Project is located next to the east end of the Historic District, which is an ideal location for new construction since it is outside of the boundaries of the Historic District and has little potential to obstruct views of contributors or interfere with historic development patterns. The Project would not affect the integrity of the Historic District because of an inappropriate location.

**Based on the above, the Project would not diminish the Historic District's integrity. Impacts would be less than significant and no mitigation measures would be required.**

*(b) Equitable Building*

Similar to impacts to the Historic District, impacts to the Equitable Building would occur if its integrity of setting and feeling would be so diminished by the new construction that the building would no longer qualify as a historical resource. In addition, Standard #9 of the Secretary of Interior Standards, which is relevant to impacts to individual resources, states that “[n]ew additions, exterior alterations, or related new construction will not destroy historic materials, features, or spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, massing, size, scale and proportion, and architectural features to protect the historic integrity of the property and its environment.” Since the Project is in close proximity to and highly visible from the Equitable Building, it is considered “related new construction.”

The Project is compatible with the Equitable Building in terms of size and proportion. Although the proposed building would be taller than the Equitable Building, the difference in height would not be substantial. The relatively small footprint of the proposed building and the narrow width of the Project frontage on Vine Street prevent it from overwhelming the Equitable Building. Thus, the Project would be mostly compatible in terms of massing and scale. The two-story base and U-shaped plan of the upper stories of the proposed building mimics that of the Equitable Building. The Project's materials and features would be modern and differentiated, but generally compatible with that of Equitable Building. Similar to the Equitable Building, the primary façade of the proposed building would also be articulated primarily by bays of windows. The Project as currently designed would substantially comply with Standard #9 and would not have such a significant visual impact that it would impair the integrity of the Equitable Building as a whole to the degree that it is no longer eligible for the listing as both a contributor to the Historic District and as an individual building.

Based on the above, the Project would substantially comply with Standard #9 and would not impact the Equitable Building's integrity of setting and feeling to the degree that it would no longer be eligible as both a contributor to the Historic District and as an individual

landmark building. **The Project would have a less than significant impact on the Equitable Building and no mitigation measures would be required.**

*(c) Pantages Theatre*

The primary visual interaction between the Project and the Pantages Theatre would occur at the east elevation of the Project and west elevation of the theatre. As shown in Figure IV.A-6 provided in Section IV.A, Aesthetics, of this Draft EIR, the visibility of the Project from the theatre's primary elevations along Hollywood Boulevard and Argyle Avenue would be indirect as the new building would become part of the background. Thus, the Project would not constitute "related new construction" and Standard #9 would not apply. However, the Project would have the potential to impact the historical resource's integrity of setting by introducing a new visual feature in its vicinity. Therefore, impacts to the Pantages Theatre would occur if its integrity of setting would be diminished by the Project to the degree that it would no longer qualify as a historical resource.

While the Project would obstruct the view of the theatre's west elevation more substantially than the existing two-story building on the Project Site, the west elevation of the Pantages Theatre is relatively blank with no openings and very minimal ornamentation. The view of the west elevation is not considered a key view of the theatre or its larger setting. Therefore, partially obstructing the west elevation would not impact the theatre's integrity of setting. The most important view of the Pantages Theatre is the view of its south elevation from Hollywood Boulevard. The Project would not have street frontage on Hollywood Boulevard, but would be visible behind the theatre from viewing positions to the east and south of the theatre. The addition of a new building to the background of the theatre, which currently includes the Equitable Building and the Capitol Records Building, would not impact the Pantages Theatre's setting to a significant degree. The theatre's low, two-story height is unique along this stretch of Hollywood Boulevard, where most of the other buildings are at least nine stories. Thus, the Project would be generally compatible with the scale of the surrounding buildings and larger setting. Furthermore, the east elevation of the proposed building, which is the only elevation that would be visible behind the theater, does not include any bright or bold features, such as signage, that would detract from the view of the Pantages Theatre, or become a dominant visual element of Hollywood Boulevard. The theater would remain highly visible and continue to be a prominent feature of Hollywood Boulevard. Therefore, the Project would not impact the integrity of the Pantages Theatre to the degree that it would no longer be eligible for listing on the National Register. **The Project would have a less than significant impact on the Pantages Theatre and mitigation measures would not be required.**

*(d) Capitol Records Building*

As shown in Figure IV.A-6 provided in Section IV.A, of this Draft EIR, the Capitol Records Building is separated from the Project Site by a relatively large surface parking lot.

Due to this physical separation, the Project would not be considered “related new construction” and Standard #9 would not apply. However, the Project would have the potential to impact the Capitol Records Building’s integrity of setting by introducing a new visual feature in its vicinity. Thus, impacts to the Capitol Records Building would occur if its integrity of setting would be diminished the Project to the degree that it would no longer qualify as a historical resource.

The Project has the potential to affect the visibility of the Capitol Records Building from Hollywood Boulevard, which is key to its setting. The Project would partially obscure the visibility of the Capitol Records Building from the corner of Hollywood Boulevard and Vine Street from a limited number of viewpoints. However, even when partially obscured, the majority of the Capitol Records Building would remain highly visible beyond the proposed new building on the Project Site, which would be lower than the Capitol Records Building’s spire and flashing red light. Furthermore, the Capitol Records Building would remain fully visible from most vantage points in the vicinity of the Project Site, and would continue to dominate the view from the Vine Street and Yucca Avenue intersection. Therefore, the Project would not impact the integrity of the Capitol Records Building to the degree that it would no longer qualify as a historical resource. **The Project would have a less than significant impact on the Capitol Records Building and no mitigation measures would be required.**

*(e) Hollywood Walk of Fame*

The Project would involve construction of a new 30-foot wide driveway and curb cut along Vine Street, which would require the temporary removal of a portion of the Hollywood Walk of Fame, consisting of terrazzo pavement and approximately five stars. Such work could result in a significant impact. As specified in Mitigation Measure CUL-MM-2, all construction activities, including the removal, storage, and replacement of the terrazzo pavement, stars, and associated materials located within the Hollywood Walk of Fame, would be conducted in full compliance with the City’s adopted “Hollywood Walk of Fame Specifications and Details” (February 24, 2011). Pursuant to these adopted regulations, the Project Applicant would be required to obtain approval of a Preservation Plan encompassing all construction, repair, and relocation work from the City’s Bureau of Engineering, Office of Historic Resources, and Cultural Heritage Commission, as well as the Hollywood Historic Trust and the Hollywood Chamber of Commerce. During construction of the driveway, the stars and associated materials (lettering, plaques, etc.) would be stored in a secured off-site location. Following completion of the new driveway and curb cut, the terrazzo pavement and stars would be reinstalled. **Implementation of Mitigation Measure CUL-MM-2 would ensure that any Project impacts to the Hollywood Walk of Fame would be mitigated to a less-than-significant level.**

(f) *Summary of Indirect Impacts*

Based on the above, the Project's indirect impacts on the Hollywood Boulevard Commercial and Entertainment District, the Equitable Building, the Pantages Theatre, and the Capitol Records Building would be less than significant and no mitigation measures would be required. However, Project construction would require the temporary removal of a portion of the Hollywood Walk of Fame, which would require mitigation. Implementation of Mitigation Measure CUL-MM-2 would ensure that any Project impacts to the Hollywood Walk of Fame would be mitigated to a less-than-significant level. **Therefore, the Project would not cause any change in the significance of a historical resource as defined in Section 15064.5 and indirect impacts to historic resources in the vicinity of the Project Site would be less than significant with mitigation.**

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

As previously discussed, the results of the archaeological records search indicate that there are no identified archaeological resources within the Project Site and one archaeological resource is located within a 0.5-mile radius of the Project Site. While these findings do not preclude the potential for an archaeological site to be identified during construction activities associated with the Project, it is considered unlikely since the Project Site has previously been graded as part of previous construction activities. However, excavation to construct the Project's subterranean parking garage would extend to a depth of approximately 55 feet below grade, which is greater than previously excavated depths. Therefore, it is possible that archaeological resources that were not identified during prior construction or other human activity may be present, which could result in significant impacts. As set forth in Mitigation Measure CUL-MM-3, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The implementation of Mitigation Measure CUL-MM-3 would ensure that any potential impacts related to archaeological resources would be less than significant. **Therefore, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and any potential impacts related to archaeological resources would be less than significant with mitigation.**

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



As discussed in Section VI, Other CEQA Considerations (Subsection IV.6.e.), of this Draft EIR, and the Initial Study (Appendix A of this Draft EIR), no human remains are known to have been found on the Project Site. While the uncovering of human remains is not anticipated, compliance with all applicable regulatory requirements would ensure that the Project's impacts to unknown human remains would be less than significant.

**Therefore, the Project would not be expected to disturb any human remains, including those interred outside of dedicated cemeteries, and impacts would be less than significant.**

## 4. Cumulative Impacts

As provided in Section III, Environmental Setting, of this Draft EIR, there are 106 related development projects, in the Project Site vicinity, as well as the Hollywood Community Plan Update. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects involve a variety of residential uses (i.e., apartments and condominiums), retail, restaurant, commercial, and office uses, consistent with existing uses in the Project Site area.

Although impacts to historic resources tend to be site-specific, cumulative impacts would occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As discussed above, there are no historical resources located on the Project Site. All Project development would remain onsite and, as described above, impacts to historic resources located within the vicinity of the Project Site would not occur. Specifically, the Project is designed to minimize potential physical or visual impacts that could reduce the integrity and/or eligibility of nearby off-site historical resources. As noted above, the Project would partially obscure the visibility of the Capitol Records Building from the corner of Hollywood Boulevard and Vine Street from a limited number of viewpoints, as would the proposed Millennium Hollywood project (Related Project No. 1). However, the proposed Millennium Hollywood building is set back from Vine Street and curves inward, reducing its potential obstruction of views from Hollywood Boulevard and Vine Street. Even when partially obscured, the majority of the Capitol Records Building would remain highly visible from this location. Furthermore, the Capitol Records Building would remain fully visible from most vantage points in the vicinity of the Project Site, including along Vine Street, and would continue to dominate the view from the Vine Street and Yucca Avenue intersection. Therefore, the Project in conjunction with nearby projects would not substantially change the existing look and feel of the surrounding area to the extent that the significance of the Capitol Records Building or any other nearby historical resource would be impaired, and

impacts would be less than significant. **Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.**

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources and human remains are uncovered, each related project would be required comply with existing regulatory requirements as well as comply with a similar mitigation measure for archaeological resources and to comply with applicable regulatory requirements regarding human remains. **Therefore, cumulative impacts to archaeological resources and human remains would be less than significant and would not be cumulatively considerable.**

## 5. Mitigation Measures

**CUL-MM-1:** Prior to commencement of new construction, a qualified structural engineer shall survey the existing foundations and other structural aspects of the Pantages Theatre and the Equitable Building to establish baseline conditions and provide a shoring design to protect each building from potential damage (See also Mitigation Measure NOI-MM-2 in Section IV.G, Noise, of this Draft EIR). Pot holing or other destructive testing of the below grade conditions on the project site and immediately adjacent to the Pantages Theatre and Equitable Building may be necessary to establish baseline conditions and prepare the shoring design. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have demonstrated experience specific to rehabilitating historic buildings and applying the Secretary's Standards to such projects. The lead agency shall determine qualification prior to any work being performed. The qualified structural engineer shall submit to the lead agency a pre-construction survey that establishes baseline conditions to be monitored during construction, prior to issuance of any building permit for the project.

**CUL-MM-2:** A Preservation Plan shall be prepared consistent with the Hollywood Walk of Fame Specifications and Details dated February 14, 2011. The Preservation Plan shall be submitted to the Los Angeles City Planning Department, Office of Historic Resources, and shall be approved by the Office of Historic Resources, the Hollywood Historic Trust, the Hollywood Chamber of Commerce, the City's Bureau of Engineering, and the Cultural Heritage Commission. No changes to the Walk of Fame, including the construction of the proposed driveway for the project, shall be made prior to the approval of the Preservation Plan.

**CUL-MM-3:** A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

## **6. Level of Significance After Mitigation**

As discussed above, Mitigation Measures CUL-MM-1 and CUL-MM-2 would ensure that potential Project-level impacts to historic resources would be less than significant. Mitigation Measure CUL-MM-3 would reduce potential Project-level impacts associated with archaeological resources to a less-than-significant level. Compliance with regulatory requirements would ensure that impacts to human remains would be less than significant. In addition, cumulative impacts associated with historic resources, archaeological resources, and human remains would also be less than significant.