

IV. Environmental Impact Analysis

B. 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. The analysis of potential impacts to historic resources is based, in part, on the *Cultural Resources Technical Appendix—6430–6440 Hollywood Boulevard and 1624–1636 Wilcox Avenue, Los Angeles, CA* (Cultural Resources Report) prepared by Jenna Snow (April 2019), included as Appendix D.1 of this Draft EIR. The analysis of potential impacts to archaeological resources is based on a records search conducted on May 24, 2017, through the South Central Coastal Information Center (SCICC), included as Appendix D.2 of this Draft EIR.

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); the California Register of Historical Resources (California Register); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.120 *et seq.*), all of which are summarized below.

(a) National Register of Historic Places

The National Register of Historic Places (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.”¹ Under the administration of the National Park Service, 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 property must be significant within a historic context. The significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific... property or site is understood and its meaning... is made clear.”² A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Furthermore, 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 (CFR), 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.*³

In addition to meeting one or more of the above criteria, district sites, buildings, structures, and objects that are at least 50 years of 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

¹ 36 CFR 60, Section 60.2.

² U.S. Department of Interior, National Park Service, National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, pp.45-46, 1995.

³ 36 CFR 60, Section 60.4.

the survival of physical characteristics that existed during the property's historic period.”^{4,5} The National Park Service has identified seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. *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. *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. *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. *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.⁶ 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 for the Treatment of Historic Properties

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 (Secretary of the Interior's Standards). Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Secretary of the Interior's Standards. The National Park Service issued the Secretary of the Interior's Standards with accompanied guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction.

The Secretary of the Interior's 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.

⁴ U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, 1995, p. 44.

⁵ U.S. Department of the Interior, National Park Service, *National Register Bulletin 16A: How to Complete the National Register Registration Form*, 1995, p. 4.

⁶ U.S. Department of Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, pp.45-46, 1995.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

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.⁷ State law provides that in order for a property to be considered eligible for listing in the California Register, it must be found by the State Historical Resources Commission to be significant under any of the following four criteria identified by OHP, which parallel National Register criteria.⁸ 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.

A 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 a historic resource and to convey the reasons for its significance. As described above, integrity is evaluated with regard to the retention of feeling, association, workmanship, location, design, setting, and materials. The resource must also be judged with reference to the particular criteria under which it is proposed for

⁷ PRC Section 5024.1(a).

⁸ California State Parks, Office of Historic Preservation, California Register of Historical Resources, http://ohp.parks.ca.gov/?page_id=21238, accessed January 7, 2020.

eligibility. 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.” Unlike the National Register, the California Register does not exclude resources less than 50 years of age. 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 historic 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 Number 770; or (3) are California Points of Historical Interest, which have been reviewed by the California OHP and recommended for listing by the State Historical Resources Commission.⁹ Resources that may be nominated for listing in the California Register include: individual historic resources; historic resources contributing to the significance of a historic district; historic resources identified as significant in historic resources surveys; historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts; and local landmarks.¹⁰

The primary difference between eligibility for listing in the National and California Registers is integrity. Properties eligible for listing in the National Register generally have a higher degree of integrity than those only eligible for listing in the California Register. There is, however, no difference with regard to significance.

(d) California Environmental Quality Act

CEQA offers protection for identified historic resources. In general, for purposes of CEQA and environmental review, a “historical resource” is that which has been determined eligible for listing in the California Register, or one that is designated at the local level. For purposes of CEQA, Public Resources Code (PRC) Section 21084.1 defines a historic 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

⁹ PRC Section 5024.1(d).

¹⁰ PRC Section 5024.1(e).

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 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 (under Division 22, Chapter 7 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). On April 2, 2007, pursuant to Ordinance 178,402, the Cultural Heritage Ordinance was moved to Division 22, Chapter 9 of the Los Angeles Administrative Code. Specifically, Section 22.171.7 of the Los Angeles Administrative Code defines the criteria for designation as any site, building, or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites that:

1. Reflect or exemplify the broad cultural, 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.¹¹

Designation recognizes the unique historic, 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."¹²

The City of Los Angeles also recognizes historic districts as Historic Preservation Overlay Zones (HPOZ).¹³ The Cultural Heritage Commission, City Planning Commission, and the City Council are responsible for establishing HPOZs.¹⁴ Areas within these historic districts have an HPOZ overlay added to its zoning and are subject to LAMC Section 12.20.3. As such, HPOZs are considered a planning tool that adds a level of protection to an area. Each HPOZ has a five-member HPOZ Board, which is an advisory body to the DCP, 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. An HPOZ does not change the underlying zoning, but adds an additional layer of protection over a zone through local board oversight. Contributing resources must meet at least one of the following criteria:¹⁵

¹¹ *Los Angeles Administrative Code, Cultural Heritage Commission, Section 22.171.7.*

¹² *City of Los Angeles, Department of City Planning, Office of Historic Resources, Historic-Cultural Monuments, Frequently Asked Questions (FAQs), <https://preservation.lacity.org/commission/frequently-asked-questions-faqs>, accessed January 7, 2020.*

¹³ *LAMC Section 12.20.3.*

¹⁴ *City of Los Angeles, Department of City Planning, Historic Preservation Overlay Zones (HPOZs), About the HPOZ Program, <https://preservation.lacity.org/hpoz/homepage/about-hpoz-program>, accessed January 7, 2020.*

¹⁵ *LAMC Section 12.20.3 F.3(c).*

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.

None of the buildings on the Project Site are located within the boundaries of an existing HPOZ.

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

The Los Angeles Historic Resources Survey, or SurveyLA, is conducted under OHR. SurveyLA is the City's comprehensive program to identify and document potentially significant historic resources. Surveys conducted under SurveyLA cover the period from approximately 1850 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 by Community Plan Area and were completed in 2016.¹⁶ 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.^{17,18}

To implement field surveys, OHR developed a framework for a citywide Historic Context Statement (HCS), which is a narrative, technical document that provides a framework for completing historic resources surveys. As discussed in the SurveyLA Field Survey Results Master Report, the applied HCS consists of nine broad contexts from 1850 to 1980, including: Spanish Colonial and Mexican Era Settlement, Pre-Consolidation

¹⁶ City of Los Angeles, Department of City Planning, Office of Historic Resources, *Field Survey Results Master Report*, August 2016.

¹⁷ 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](https://preservation.lacity.org/survey-la-findings-and-reports#Survey%20List), accessed January 7, 2020.

¹⁸ City of Los Angeles, Department of City Planning, Office of Historic Resources, *HistoricPlacesLA*, www.historicplacesla.org/index.htm, accessed January 7, 2020.

Communities of Los Angeles, Residential Development and Suburbanization, Commercial Development, Industrial Development, Public and Private Institutional Development, Architecture and Engineering, Entertainment Industry, and Cultural Landscapes. The HCS not only identifies contexts and themes within which a property may be significant, but also includes eligibility standards that provide physical and associative characteristics a property must have to convey its significance.

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.

(g) City of Los Angeles General Plan

The City of Los Angeles General Plan adopted its Conservation Element in 2001. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historic 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 related objective to protect important cultural and historic sites and resources for historic, cultural, research, and community educational purposes.¹⁹

The City of Los Angeles General Plan also includes 35 Community Plans that comprise the General Plan's Land Use Element. As discussed in Section IV.D, Land Use, of this Draft EIR, the Project Site is located within the planning boundary of the Hollywood Community Plan, adopted in December 1988. The City is currently in the process of updating the Hollywood Community Plan. An updated plan has been drafted and the corresponding EIR is underway. In the meantime, the existing Hollywood Community Plan remains in effect.

The Hollywood Community Plan does not specifically address historic resources; however, a stated objective of the Hollywood Community Plan is to "encourage the protection and enhancement of the varied and distinctive residential character of the Community." In addition, the Housing Policy in the Hollywood Community Plan version "encourages the preservation and enhancement of well defined residential neighborhoods

¹⁹ *City of Los Angeles General Plan, Conservation Element, September 2001, p. II-6 through II-9.*

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

(h) Hollywood Redevelopment Plan and Community Redevelopment Agency of Los Angeles

The Hollywood Redevelopment Plan and Hollywood Redevelopment Project Area were established by the City of Los Angeles Community Redevelopment Agency (CRA) in 1986 to encourage development in the Hollywood community, which was in a state of economic decline. The Hollywood Redevelopment Project Area is generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The goals of the Hollywood Redevelopment Plan include “the retention, restoration, and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.”²¹ As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations were compiled from historic surveys in 1986, 1997, and 2003 and were made available on the CRA website. The most recent intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2009 and made available on the SurveyLA website to provide information regarding the status of properties in the Hollywood Redevelopment Project Area and to help identify potential historic resources (2009 CRA Survey).²² The CRA was dissolved on February 6, 2012, and administration of the Hollywood Redevelopment Project area has been transferred to the CRA/LA, a Designated Local Authority (DLA) and successor to the CRA, and may transfer to the DCP in the future.

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

²¹ *Community Redevelopment Agency of Los Angeles, Hollywood Redevelopment Plan, As First Amended on May 20, 2003.*

²² *Chattel Architecture, Planning & Preservation, Inc., “Intensive Historic Resources Survey, Hollywood Redevelopment Project Area,” prepared for the Community Redevelopment Agency of the City of Los Angeles, February 2010, revised January 2012.*

(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), NHPA, 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 Section 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 the State 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 a historic 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 historic 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 historic 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 historic 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.²³

With regard to human remains, CEQA Guidelines Section 15064.5, 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.

PRC Section 5097.5 states that violation of the following section would be a misdemeanor:

*No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*²⁴

(b) City of Los Angeles General Plan Conservation Element

Section 3 of the Los Angeles General Plan Conservation Element 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.

As described above, Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historic heritage. The Conservation Element establishes the policy to continue to protect historic and cultural

²³ PRC Section 21083.2(g).

²⁴ PRC Section 5097.5 specifies that "public lands" means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historic sites and resources for historic, cultural, research, and community educational purposes.²⁵

b. Existing Conditions

(1) Project Site

The Project Site is located in a highly urbanized area within the Hollywood Community Plan area. Specifically, the Project Site is comprised of five parcels on 1.4 acres located on the southeast corner of Hollywood Boulevard and Wilcox Avenue. The Project Site is located within the Hollywood Redevelopment Project Area, for which a historic resources survey was prepared in 2009 by Chattel Architecture, Planning, and Preservation, Inc. for the former Community Redevelopment Agency of the City of Los Angeles (2009 CRA Survey).

Four of the five parcels that comprise the Project Site are currently developed with one building each (6430 Hollywood Boulevard, 6436 Hollywood Boulevard, 1624–1626 Wilcox Avenue, and 1636–1644 Wilcox Avenue). The fifth parcel does not have street frontage and is currently developed with a surface parking lot. All four buildings are constructed to the sidewalk edge along Hollywood Boulevard and Wilcox Avenue. As further described below, the Attie Building located at 6436 Hollywood Boulevard is a contributing structure to the historic Hollywood Boulevard Commercial and Entertainment District. The Attie Building directly abuts a commercial building located at 6430–6434 Hollywood Boulevard to the east. A shallow walkway along its south elevation separates the Attie Building from a commercial building located at 1636–1644 Wilcox Avenue. The building at 1624–1626 Wilcox Avenue is located at the south side of the Project Site, separated from 1636–1644 Wilcox Avenue by driveways to the surface parking lot that surrounds two sides of the subject properties on Wilcox Avenue. The National Register-listed Hollywood Walk of Fame runs along the sidewalk of Hollywood Boulevard adjacent to the Project Site. A mural, painted in 1983, is located on the west elevation of the Attie Building.

(2) Hollywood Boulevard Commercial and Entertainment District

As shown in Figure IV.B-1 on page IV.B-15, the Hollywood Boulevard Commercial and Entertainment District consists of 63 contributing properties along both sides of Hollywood Boulevard between El Cerrito Place to the west and Argyle Avenue to the east.

²⁵ *City of Los Angeles General Plan, Conservation Element, September 2001, pp. II-6 through II-9.*

LEGEND




-  Boundary of Hollywood Boulevard Commercial and Entertainment District
-  Contributing Resources
-  Location of Project

Figure IV.B-1

Hollywood Boulevard Commercial and Entertainment District

The Hollywood Boulevard Commercial and Entertainment District was listed in the National Register in 1985 for its significance under three criteria: A, B, and C.²⁶ The National Register nomination form provides the following description of the historic Hollywood Boulevard Commercial and Entertainment District:²⁷

The Hollywood Boulevard District is a 12 block area of the commercial core along Hollywood's main thoroughfare, which contains excellent examples of the predominant architecture styles of the 1920s and 1930s. The area contains a mix of Classical Revival, Spanish Colonial Revival, and Art Deco structures. Over 100 buildings are included. The development pattern of the 1920s, with high-rise buildings at major intersections, flanked by one and two-story retail structures, remains intact to this day...

Hollywood Boulevard, the main street of the film capital of the world, has been famous since the 1920s. The Golden Era of Hollywood is clearly depicted in this area of the commercial corridor with its eclectic and flamboyant architectural mix. The district is a thematic one, representing the retail, financial, and entertainment functions of the street and the relationship of the various structures to the movie industry, a 20th century phenomenon which helped to shape the culture of the nation as a whole.

Hollywood Boulevard within the Project vicinity consists of commercial and mixed-use buildings with a mix of architectural styles. Contributing buildings to the historic district range from one to 12 stories, with taller buildings generally anchoring corners and major intersections. Within the Hollywood Boulevard Commercial and Entertainment District and north of the Project Site at the northeast corner of Wilcox Avenue and Hollywood Boulevard is the five-story Hollywood Pacific Theater, also known as the Warner Pacific Theatre or Warner Hollywood Theatre (6423 Hollywood Boulevard), built in 1927 and a district contributor, with two radio antennas along the east and west sides of its roof. Other nearby contributing resources to the historic district along Hollywood Boulevard include: the 12-story Guaranty Building, built in 1923, located at the northeast corner of Hollywood Boulevard and Ivar Avenue (6331 Hollywood Boulevard); the four-story Creque Building, built in 1913 with a “facelift” in 1931, located at the southeast corner of Hollywood Boulevard and Cahuenga Boulevard (6400 Hollywood Boulevard); the seven-story Security Trust building, built in 1921 and located at the northeast corner of Hollywood and Cahuenga Boulevards (6381 Hollywood Boulevard); the two-story Holly Cinema, built in

²⁶ *Hollywood Heritage, Inc., Policies and Procedures*, www.hollywoodheritage.org/policies-and-procedures, accessed January 7, 2020.

²⁷ *National Park Service, National Register of Historic Places Inventory—Nomination Form, Hollywood Boulevard Commercial and Entertainment District*, dated April 4, 1985.

1920 and located at the southeast corner of Hollywood Boulevard and Hudson Avenue (6523 Hollywood Boulevard); and the four-story Hillview Apartments, built in 1917 and located at the southwest corner of Hollywood Boulevard and Hudson Avenue (6531 Hollywood Boulevard).

Separately listed as an individual resource in the National Register in 1985, the United States Post Office, Hollywood Station, at 1615 Wilcox Avenue is also located in the vicinity of the Project Site across Wilcox Avenue at the northwest corner of Wilcox Avenue and Selma Avenue. The United States Post Office is significant for both its architecture and “as a sign that the federal government recognized the importance of the Hollywood community.”

(3) Historic Background

(a) History of Hollywood²⁸

In 1903, Hollywood was established as an independent city with a small agricultural community of 700 people. At the time, Hollywood Boulevard was called Prospect Avenue and was developed with large estates. In 1910, the independent City of Hollywood, with over 4,000 residents, became incorporated into the neighboring City of Los Angeles. As commerce in Hollywood increased, Hollywood developed into a high-density urban core. By 1913, the block between Cahuenga Boulevard and Wilcox Avenue on Hollywood Boulevard had become completely commercial, and more than one hundred businesses were located along the length of the boulevard by 1915.

By the beginning of the 1920s, Hollywood was the largest of the outlying commercial centers in the Los Angeles area. More than 200 stores lined Hollywood Boulevard in the eight blocks between Cahuenga Boulevard and Highland Avenue. The district was promoted as an exclusive metropolitan center and a wealthy community outside the city center (despite the visibility of prostitution and poverty). Hollywood’s exclusiveness was reflected in the types of stores (e.g., department stores) located within the district, the goods offered for sale, and in the patrons themselves. Companies such as Maytag, Frigidaire, and General Electric contributed to such appeal by offering new consumer goods that were still unattainable for many people. While restaurants catered to the wealthy, chain drug and food stores also catered to more commonplace needs as well.

²⁸ Chattel Architecture, Planning & Preservation, Inc., “Intensive Historic Resources Survey, Hollywood Redevelopment Project Area,” prepared for the Community Redevelopment Agency of the City of Los Angeles, February 2010, revised January 2012.

As the 1920s progressed, under the direction of the newly-formed Hollywood Chamber of Commerce, residential uses built from previous decades along Hollywood Boulevard were transitioned into intensive commercial uses. Developers such as C.E. Toberman helped to establish Hollywood as an important financial and office center by expanding services that could compete with those in the downtown area. Such efforts to recast Hollywood as a center for commerce were successful. In the years preceding the Depression, the rate of Hollywood's skyscraper construction was unprecedented both within Los Angeles as well as in the rest of the nation. Seven tall office buildings, including the Taft Building (6290 Hollywood Boulevard built in 1924) and the Hollywood First National Bank (6777 Hollywood Boulevard built in 1927), were developed along Hollywood Boulevard. New commercial buildings rose at a rapid rate along what was increasingly becoming defined as Hollywood's business core, and these new buildings often replaced not only residential buildings but even smaller scale commercial buildings built just years beforehand. Furthermore, the first height-limit building to be constructed was the 12-story Guaranty Building (6331 Hollywood Boulevard built in 1923), followed by others such as the First National Bank (6777 Hollywood Boulevard built in 1927) and the Hollywood Equitable Building (6253 Hollywood Boulevard built in 1929).

As Hollywood developed quickly from a rural but wealthy enclave in the 1910s to a bustling commercial district in the 1920s, the Chamber of Commerce explicitly mandated that Hollywood Boulevard stores reflect the quality of those in the East, such as New York and Chicago. By the mid-1920s, styles offered in Hollywood stores increasingly defined the district as a center of fashion. In 1923, I. Magnin, the northern California department store known for its distinguished ambience, opened its first branch in Hollywood at 6340 Hollywood Boulevard. By 1928, Hollywood's commercial ascendancy had become increasingly apparent when downtown based Dyas Department store opened a branch in Hollywood at 6300 Hollywood Boulevard that was larger than its downtown branch. With department stores such as the CRS Co. (later Robertson's) having as many as 43 individual departments within its enclosure, the Hollywood Boulevard Association proudly proclaimed Hollywood the "World's Largest Department Store" shortly after the group's foundation in 1928.

Following World War II, Hollywood Boulevard gradually shifted from a center of fashion and department stores to a seedier scene by the 1970s. Such a shift coincided with the transition of the entertainment industry, and television and radio studios began to occupy buildings previously used primarily for movie making. In addition, the change in the transportation industry also signaled a change in culture, as the 1954 completion of the Hollywood Freeway (Highway 101) through the Cahuenga Pass further allowed automobile transport to become the dominant transportation mode into and through the Hollywood area instead of the interurban Pacific Electric Railway. By the 1960s, youth culture also began to establish itself in Hollywood. The Playmates store was the first place in

Los Angeles to offer hip-hugging bellbottoms for sale while nearby the Frederick's of Hollywood store was the first in the nation to offer French bikinis.

During this period, business interests attempted to revive an earlier, more glamorous image of Hollywood by creating the National Register-listed Walk of Fame. The Walk of Fame was funded through a tax bill and required every owner along Hollywood Boulevard to pay an assessment, which led to the placement of the first eight names in 1958. Currently, the Walk of Fame extends along Hollywood Boulevard from La Brea Avenue to Gower Street and along three blocks of Vine Street from Yucca Street to Sunset Boulevard. Walk of Fame stars located in the sidewalk in front of the Attie Building include those for actress Irene Dunne, alternative rock band Jane's Addiction, and comedian Richard Pryor.

(b) Art Deco Architecture

As discussed below, the Attie Building is designed in the Art Deco architectural style. Art Deco originated as an early Modernism movement first introduced in Paris and featured prominently at the 1925 Exposition Internationale des Arts Décoratifs et Industriels Modernes—a world's fair from which the movement derived its name. Art Deco was unlike other Modernist architectural movements, which completely avoided ornamental reference to earlier periods. Art Deco combined updated interpretations of ancient Egyptian, Mayan, Aztec, Greek, Roman, and Medieval Gothic ornamentation, which can be attributed to the era's numerous archaeological discoveries, with elements from emerging abstract design movements, like cubism and futurism. It also celebrated the beauty of technology in the early twentieth century, in a society where technology and machines were being increasingly idolized.

Art Deco buildings emphasize simple geometric forms and repetition. They often have a sleek, linear appearance with stylized, often geometric ornamentation. Primary façades often feature a series of setbacks that create a stepped outline. Chevrons, zigzags, and other geometrical motifs are common forms of ornament. In applied arts, the Art Deco movement combined technology and geometry. Paintings from this time period contain many references to trains, planes, cars, and skyscrapers, mixing art with scientific advancement.

(c) Description of Existing Project Site Buildings

(i) 6436 Hollywood Boulevard—The Attie Building

Physical Description—Exterior

Designed in the Art Deco style, the Attie Building is a rectangular commercial and office building, with its narrower frontage on Hollywood Boulevard. The Attie Building is two stories high along Hollywood Boulevard and steps down to one story along North

Wilcox Avenue. A decorative parapet extends above the roofline and conceals the vaulted shape of the roof and several pyramidal skylights from street view. An elevator and mechanical penthouse are also located on the roof, along with three, solid-panel roof signs mounted on superstructures. Fenestration generally consists of double-hung wood sash windows.

Art Deco elements are concentrated at the second floor on north and west elevations. Providing a strong sense of verticality, a single row of second floor windows is separated by fluted pilasters of glazed terracotta that extend above the roofline. Windows are generally grouped in threes, with a wider, more dramatic fluted pilaster every third window. Decorative cast stone spandrel panels of geometric and floral bas-relief are located above and below window openings. Walls are capped in a narrow, glazed terracotta cornice with a vertical line pattern. Second floor decorative elements wrap the west edge of the south elevation and north edge of the east elevation.

The north elevation ground floor contains two retail storefronts, with the west storefront roughly the width of one architectural bay,²⁹ and the wider, east storefront roughly the width of two bays. Both storefronts have contemporary glazed storefront door and window systems, each with a pair of swinging doors flanked by fixed storefront windows and transoms above. Both have exterior, wall-mounted, metal roll-up security gates. Above storefronts are blank wall areas for tenant signage. The wall area above the east storefront extends up to the base of second floor window sash, while the wall area above the west storefront sits lower, revealing decorative spandrel panels below second-floor windows.

The west elevation ground floor contains two large, fixed-sash windows in its northernmost bay, with a blank wall area above for tenant signage. To the south, the second, third, and fourth architectural bays encompass a solid wall with a Hollywood-themed painted mural at the ground floor (further described below). Decorative horizontal trim extends south across the remaining portion of the elevation. The fifth bay is two-thirds of the width of the other bays and includes a single swinging door surrounded by a glass tile block wall with a small marquee sign above. The sixth bay encompasses the entire one-story portion of the building, and has a blank, smooth stucco wall with space for small advertisements including movie posters.

The south elevation is secondary and void of ornament, with the exception of the previously noted decoration that wraps a portion of the second floor. It is clad in smooth stucco and contains several secondary doors and windows. The east elevation directly

²⁹ The architectural term “bay” refers to the vertical divisions of the building. Typically, a bay is defined either by fenestration, piers, or some other organizing principal.

abuts 6430–6434 Hollywood Boulevard such that only a portion of the elevation is visible above the adjacent building. This portion is secondary and void of ornament, with exception of the terracotta horizontal trim that wraps from the north elevation. The east elevation is finished in smooth stucco and has several casement windows at the second floor.

History of Alterations

Constructed in 1931, the Attie Building replaced an earlier, two-story, Classical Revival style Bank of Italy on the site. The Attie Building was designed as a commercial building for stores and offices and constructed for owner Capital Company, a subsidiary of Bank of America, which later relocated to the Transamerica Building in Los Angeles.³⁰ The reinforced concrete building was completed for \$38,000, indicating a substantial investment. Although not listed on the original permit, architect Henry A. Minton and contractor Herbert M. Baruch Corporation are listed on permits that were issued a week later, indicating they were likely the original architect and contractor.

With the exception of the storefronts, the Attie Building appears much as it did when it was constructed in 1931. In 1946, the east storefront was altered again to accommodate Graysons, a lower price clothing store for women. The alterations were designed by the firm Gruen + Krummeck and are described in several building permits, dated between February and April 1946.³¹ Historic photos show a deeply inset, glazed entrance, enhanced by a curved lintel. Bars of neon create a swooping effect, and script lettering outlined in neon stretches across the lintel.

In 1964, interior alterations were made to the west storefront to accommodate a new tenant, See's Candies. In 1983, the east storefront windows were altered again, removing the distinctive, curved lintel. There are no remaining features or materials of the Gruen + Krummeck designed storefront. In 1941 and 1963, the building was re-roofed. Between 1946 and 1978, there are multiple permits for new signage, likely changing with both tenants and styles.³² It is not known when the entrance to the second-floor offices

³⁰ *Bank of America was the name of the holding company formed by Amadeo Peter Giannini in the 1920, the largest of which was Transamerica Company. Giannini had previously established Bank of Italy in 1904, which became the largest commercial bank in the world by serving members of the community such as the working class, immigrant populations, and small businesses that had not previously had access to financial institutions.*

³¹ *Permit details are listed on page 13 of the Cultural Resources Report included as Appendix D.1 of this Draft EIR.*

³² *A description of tenant history of 6440 Hollywood Boulevard, 6438/6436 Hollywood Boulevard, and 1646 (1648) Wilcox Avenue is provided in the Cultural Resources Report included as Appendix D.1 of this Draft EIR.*

along the west elevation was altered. However, it is possible the work was completed in the 1980s, based on the use of glass brick surrounding the door, which was a common material during that time period.³³

In 1983, a mural titled “You are the Star” was painted on the west elevation of the building along Wilcox Avenue in preparation for the 1984 Summer Olympics in Los Angeles. The 20-foot by 30-foot mural, painted by Thomas Suriya, depicts movie stars as an audience in a movie theater. In 2007, Suriya restored the mural with the assistance of art conservator Nathan Zakheim Associates and with funds provided by the CRA. The mural has been identified by the Mural Conservancy of Los Angeles.

(ii) *6430–6434 Hollywood Boulevard*

Physical Description

The building located at 6430–6434 Hollywood Boulevard directly abuts the Attie Building (6436 Hollywood Boulevard) to the east. The building is oriented north and contains a one-story commercial building that is rectangular in plan and built to lot lines. The building has a barrel-vaulted roof and flat parapet at the primary north façade and has no discernible architectural style. The north facade is one architectural bay wide, with simple storefronts with full-height glazing, covered with a corrugated metal security door, and a metal cornice and blank stucco wall above. East and west elevations are not visible, as they directly adjoin adjacent buildings. The south elevation is utilitarian in character, though fenestration and doors are not readily visible.

History of Alterations

The existing 6430–6434 Hollywood Boulevard building replaced an earlier commercial building that housed a Bank of America and Postal Telegraph Company. Permits were issued to demolish that building in 1931, and another permit was issued the same year to construct a retail and office building. The new building was to be one-story, 50 feet by 130 feet in size, built to lot lines, 30 feet in height, with reinforced concrete exterior walls, frame, and foundation, and wood joists, floors, and roof. Similar to the adjacent Attie Building, the 6430–6434 Hollywood Boulevard building was constructed for Capital Company by architect Henry A. Minton and contractor Herbert M. Baruch Corporation. The building was completed by 1932.

³³ *Widespread use of glass block as an architectural element began in the 1930s and coincided with the popularity of Streamline Moderne architecture, signifying modernity and innovation. While it lost popularity when that architectural style was replaced in favor of other more “Modern” architectural styles, it regained a modicum of popularity in the 1980s. (Elizabeth Fagan, Building Walls of Light: The Development of Glass Block and its Influence on American Architecture in the 1930s, MS Thesis, Columbia University Graduate School of Architecture, Planning, and Preservation, May 2015.)*

The 6430–6434 Hollywood Boulevard building has been extensively altered since its original construction. As shown in the Cultural Resources Report, storefronts and retail spaces have changed numerous times with each change in tenant, the building bears no resemblance to its initial appearance.³⁴

Additional permits describe alterations to the property. Two separate permits were issued to remove and/or remodel storefronts in 1936. In 1946–1947, major changes were made to the building, including the addition of a 17-foot-high, 120-foot-long partition to the interior, reconfiguring the space to house multiple tenants; removal of the roof to the first truss; removal of non-structural terra cotta (presumably at façade); addition of a new curtain wall and furred ceiling; and additional remodeling of storefronts.³⁵ Permits from later decades show storefronts and signage were repeatedly altered over ensuing years. Additionally, building permits dating back to 1933 reference a mezzanine, which is no longer extant. Permits were issued over time to modify the mezzanine, including expansion to house offices in 1948.

(iii) *1624–1626 Wilcox Avenue*

Physical Description

The property at 1624–1626 Wilcox Avenue is oriented west toward Wilcox Avenue. The property contains one commercial building that is wrapped by an L-shaped surface parking lot to the north and east. The building is one story high and rectangular in plan with a flat roof and does not consist of a predominant architectural style. Exterior elevations are finished in smooth stucco. The primary west façade has two vertical divisions corresponding to two separate retail spaces. Primary building entrances are contained within storefronts with awnings. The north storefront has the main entrance in its south end, with fixed storefront windows to the north, while the south storefront has the main entrance centered, recessed, and flanked by fixed metal sash storefront windows. The north and east elevations are secondary and unadorned. The south elevation is located immediately adjacent to the building to the south and is not visible.

History of Alterations

The current building at the property was constructed in 1939 for the Muller Brothers. While no architect was listed on the building permit, the engineer was listed as John. E. Mackel and the contractor was listed as Horace Shidler. The one-story building was built

³⁴ A description of tenant history of 6430–6434 Hollywood Boulevard is provided on page 19 of the Cultural Resources Report included as Appendix D.1 of this Draft EIR.

³⁵ Permit details are listed on page 20 of the Cultural Resources Report included as Appendix D.1 of this Draft EIR.

with wood frame construction, stucco walls, and composition roof. In 1947, under continued ownership by the Muller Brothers, the building underwent storefront remodeling at 1624 Wilcox Avenue to install new doors and plate glass windows. In 1957, a permit was issued to owner M. Greenstein for interior work, including partitions and a new ceiling at 1626 Wilcox Avenue.³⁶

(iv) 1636–1644 Wilcox Avenue

Physical Description

The property at 1636–1644 Wilcox Avenue is located immediately south of the Attie Building and consists of one commercial building wrapped by an L-shaped surface parking lot to the south and east. The building is one story high and rectangular in plan with a flat roof. While there is no predominant architectural style, the building does have elements of Art Deco, as seen from stepped, vertical pilasters that serve as divisions between the five storefronts. Exterior elevations are clad in smooth stucco with tile bulkheads at the storefronts. Primary building entrances are contained within storefronts. They are recessed and consist of single doors with transom lights flanked by fixed metal-sash storefront windows. Awnings shade each storefront. South and east elevations are secondary and unadorned. The north elevation is not visible due to its close proximity to the Attie Building.

History of Alterations

The 1636–1644 Wilcox Avenue parcel underwent its initial phase of construction in 1940, when a permit was issued to the Muller Brothers for construction of a new store building at 1642–1644 Wilcox Avenue. The new building was 40 feet by 80 feet, one and two stories, and 20 feet in height with wood frame construction, exterior walls of stucco, and a composition roof. The engineer was John E. Mackel, and the contractor was Horace Shidler. Ray V. Anderson was the contractor for the two following phases. In 1945, the Muller Brothers selected to add a 40-foot by 80-foot wood-frame and stucco addition to install two stores to the existing building. The address of the new addition was 1638–1640 Wilcox Avenue. In 1947, a permit was issued to owner Muller Holding and Investment Company to add an 80-foot by 85-foot, one-story wood-frame addition to install another store to the existing building. The address of the new addition was 1636 Wilcox Avenue.³⁷

³⁶ A description of tenant history for 1624–1626 Wilcox Avenue is provided in the Cultural Resources Report included as Appendix D.1 of this Draft EIR.

³⁷ A description of tenant history for 1636, 1638, 1640, 1642, and 1644 Wilcox Avenue is provided in the Cultural Resources Report included as Appendix D.1 of this Draft EIR.

(4) Evaluation of Historical Significance

As shown in Figure IV.B-2 on page IV.B-26, the Project Site includes a historic resource and is located within the National Register-listed historic Hollywood Boulevard Commercial and Entertainment District. An evaluation of the historical significance of each of the on-site buildings is provided below.

(a) 6436 Hollywood Boulevard—The Attie Building

The period of significance for the Attie Building begins with its construction in 1931 and ends in 1939, which coincides with the end of the period of significance for the Hollywood Boulevard Commercial and Entertainment District.

As a contributing building to the historic district, the Attie Building is primarily significant for its distinctive architectural style and design by notable architect Henry A. Minton, under National Register Criterion C/3/3.³⁸ The building, with its glazed terra cotta, fluted pilasters, spandrel panels of geometric and floral bas-relief, and cornice with a vertical line pattern, is an excellent example of the style and embodies a high quality of design and essential character-defining features. As detailed in the Cultural Resources Report, Minton was the architect of many of Bank of Italy buildings and also worked for the San Francisco Archdiocese of the Catholic Church. Minton was recognized in his time as an important architect, as evidenced by the 12-page publication dedicated to him in one of the leading publications of the time, *The Architect and Engineer*.

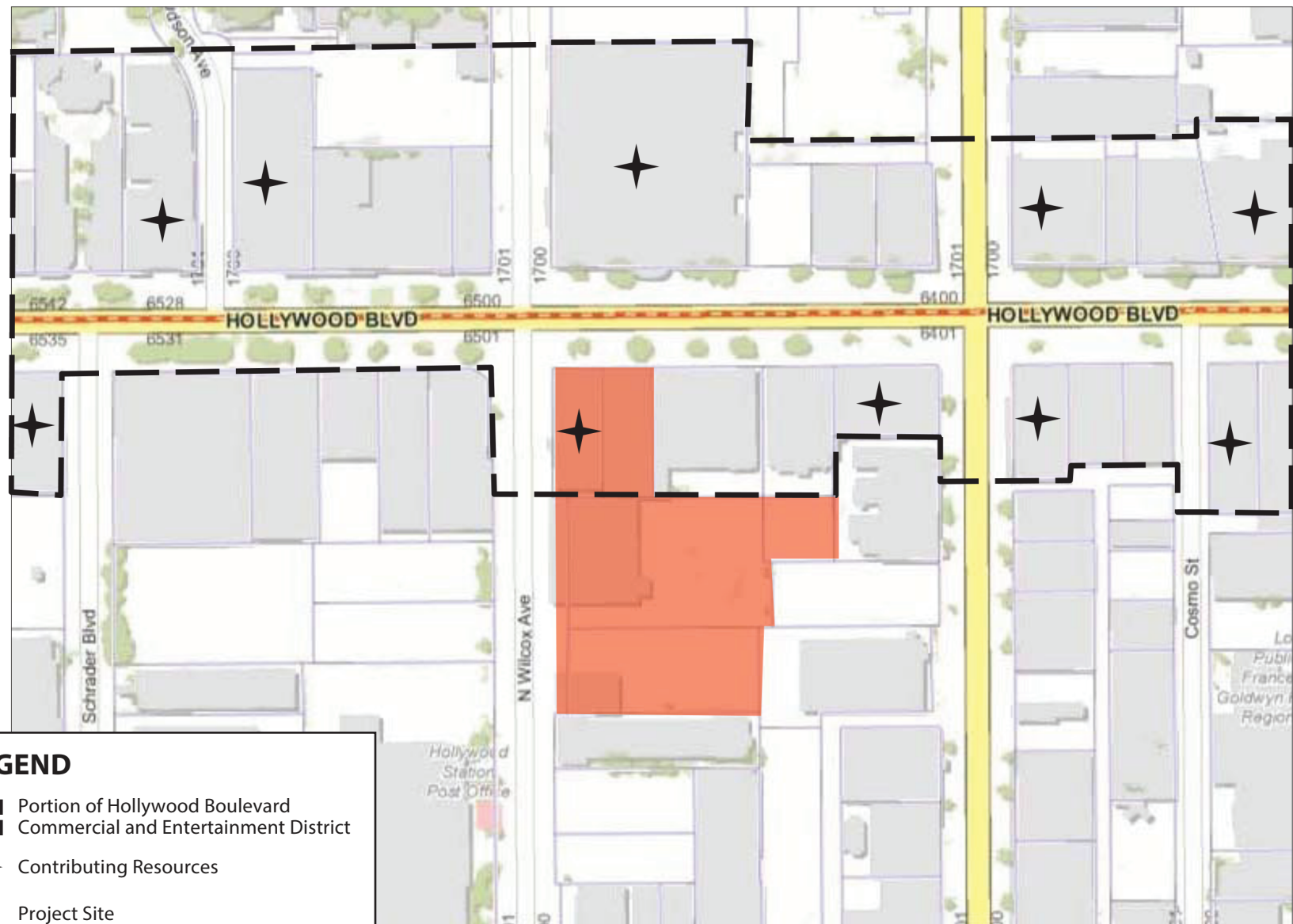
The Hollywood Boulevard Commercial and Entertainment District is significant as a commercial center under Criterion A/1/1.³⁹ While the Attie Building may have contributed to that significance when it was constructed and through the 1950s, it no longer retains sufficient integrity to convey that significance. Ground floor retail spaces have been significantly altered on both the exterior and interior and do not retain any physical features of earlier tenants. In addition, while there are many people associated with the Attie Building, as discussed further in the Cultural Resources Report, none rise to the level of significance to warrant consideration under Criterion B/2/2.⁴⁰

Although painted in 1983 outside of the period of significance, the “You are the Star” mural may be significant as one of the oldest and last surviving murals in Hollywood from

³⁸ Criterion C/3/3: Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual or possesses high artistic values.

³⁹ Criterion A/1/1: Is associated with events that have made a significant contribution to the broad patterns of our history and cultural heritage.

⁴⁰ Criterion B/2/2: Is associated with the lives of persons important in our past.



LEGEND




-  Portion of Hollywood Boulevard Commercial and Entertainment District
-  Contributing Resources
-  Project Site

Figure IV.B-2
Historic Resources in the Project Study Area

the early 1980s, an area of the city that once had a concentration of murals. It is also important to note that the “You Are a Star” mural was painted in preparation for the 1984 Summer Olympics. Highly visible from Hollywood Boulevard, the mural depicts an entertainment industry–related theme appropriate to popular imagination of Hollywood. Therefore, while it may not be eligible for designation, it is culturally important to Hollywood and included in this discussion as part of a conservative analysis. As described above, the mural has been identified by the Mural Conservancy of Los Angeles.

(b) 6430–6434 Hollywood Boulevard

As detailed in the Cultural Resources Report, the 6430–6434 Hollywood Boulevard building has repeatedly and consistently been found ineligible as a contributing resource to the historic Hollywood Boulevard Commercial and Entertainment District due to its numerous alterations over the years. While the building may have, at one time, contributed to Hollywood Boulevard as a commercial center, it has never been considered an architecturally distinguished building. Historically, 6430–6434 Hollywood Boulevard was a one-story, undistinguished commercial building. Ground-floor retail spaces have been significantly altered on both the exterior and interior and do not retain any physical features of earlier architectural design or tenants.

As discussed in more detail in the Cultural Resources Report, due to multiple and substantial alterations, the building at 6430–6434 Hollywood Boulevard does not retain any semblance to how it looked when constructed in 1931, or from any other date during the period of significance for the Hollywood Boulevard Commercial and Entertainment District. It, therefore, does not retain sufficient integrity to convey any significance connected to Hollywood Boulevard as a commercial center and is not a contributing resource to the historic district.

(c) 1624–1626 Wilcox Avenue

The 1624–1626 Wilcox Avenue building was previously evaluated in the 2009 CRA Survey and found ineligible as a historic resource with California Historical Resource Status Code “6Z.” The eligibility of the building is described below under each of the criterion at federal, state and local levels.

- Criterion A/1/1: The 1624–1626 Wilcox Avenue building has not been shown to have made a significant contribution to the broad patterns of our history. Constructed in 1939, the building is modestly sized and was constructed as an investment. The property followed the pattern of commercial development in the surrounding area by nearly a decade. As 1624–1626 Wilcox Avenue cannot be shown to have made any contribution to the broad patterns of our history, it is not individually eligible under criterion A/1/1. Located off of Hollywood Boulevard, 1624–1626 Wilcox Avenue was constructed at the end of the period of

significance for the historic district and cannot be shown to be occupied the year of its construction. As such, it is also not eligible to contribute to Hollywood Boulevard as a commercial center under Criterion A/1/1 as part of the historic district.

- Criterion B/2/2: Few individuals can be associated with 1624–1626 Wilcox Avenue building. The building was constructed as an investment property for the Muller Brothers and housed several tenants over the years. The property was not the only investment of the Muller Brothers, who have not been shown to be persons important in our past. Since no individual associated with the tenants could be identified, the building does not warrant consideration related to association with the lives of persons important in our past. Therefore, 1624–1626 Wilcox Avenue is not eligible under Criterion B/2/2.
- Criterion C/3/3: The 1624–1626 Wilcox Avenue building does not possess distinctive characteristics or high artistic values. It is a very modest building with no architectural style. No architect is listed on the original building permit, and engineer John E. Mackel and contractor Horace Shidler do not appear to have been important creative individuals. Therefore 1624–1626 Wilcox Avenue is not eligible under Criterion C/3/3.
- Criterion D/4: The 1624–1626 Wilcox Avenue building cannot be reasonably expected to yield information important in prehistory or history; therefore, it is not eligible under Criterion D/4.

(d) 1636–1644 Wilcox Avenue

The 1636–1644 Wilcox Avenue building was previously evaluated in the 2009 CRA Survey. The property was found ineligible as a historic resource in that survey and assigned California Historical Resource Status Code “6Z.” The Cultural Resources Report confirms that finding. The following considers 1636–1644 Wilcox Avenue for eligibility under each of the criterion at federal, state and local levels under a single heading.

- Criterion A/1/1: The 1636–1644 Wilcox Avenue building has not been shown to have made a significant contribution to the broad patterns of our history. Constructed in several phases beginning in 1940, the building was constructed as an investment. The property followed the pattern of commercial development in the surrounding area by a decade. As 1636–1644 Wilcox Avenue cannot be shown to have made any contribution to the broad patterns of our history, it is not individually eligible under Criterion A/1/1. In addition, 1636–1644 Wilcox Avenue was constructed after the period of significance for the historic district. As such, it is not eligible to contribute to Hollywood Boulevard as a commercial center under criterion A/1/1 as part of the historic district.
- Criterion B/2/2: Few individuals can be associated with the 1636–1644 Wilcox Avenue building. The building was constructed as an investment property for the

Muller Brothers and housed several tenants over the years. The property was not the only investment of the Muller Brothers, who are not considered as persons important in our past, as described above. Since no individual associated with the tenants could be identified, the building does not warrant consideration related to association with the lives of persons important in our past. Therefore, 1636–1644 Wilcox Avenue is not eligible under Criterion B/2/2.

- Criterion C/3/3: The 1636–1644 Wilcox Avenue building does not possess distinctive characteristics or high artistic values. As described above, the building was constructed in several phases, and stepped pilasters somewhat reminiscent of Art Deco style separated each construction phase. This one feature appears to be accidental, however, and was not a deliberate application of the style. As such, the building is not a distinctive example of any architectural style. No architect is listed on any building permit, and engineer John E. Mackel and contractor Horace Shidler do not appear to have been important creative individuals, as also mentioned above. Therefore 1636–1644 Wilcox Avenue is not eligible under Criterion C/3/3.
- Criterion D/4: The 1636–1644 Wilcox Avenue building cannot be reasonably expected to yield information important in prehistory or history; therefore, it is not eligible under Criterion D/4.

(e) Conclusion

As discussed above and as discussed in detail in the Cultural Resources Report, the Attie Building is the only historic resource within the Project Site. The remaining Project Site buildings have not been identified as eligible for designation, either individually or as part of the Hollywood Boulevard Commercial and Entertainment District after numerous applications.

(5) 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 May 24, 2017, a cultural resources records search was conducted through the SCICC (see Appendix D.2 of this Draft EIR). The results of the record search indicate that a total of 43 cultural resource reports and studies have been conducted within a 0.5-mile radius of the Project Site, seven of which included the Project Site. The records search also found that there are no archaeological resources located within the Project Site; however, two archaeological resources are located within a 0.5-mile radius of the Project Site. Although the Project Site has been previously developed and graded, it has not been previously surveyed for the presence of archaeological resources. In addition, the existing development on the Project Site does not allow for an adequate surface survey. Thus, there is potential for an archaeological site to be identified during construction activities associated with the Project.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

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

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

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

(2) 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following factors to evaluate cultural resources:

(a) Historic Resources

- If the project would result in a substantial adverse change in the significance of a historic resource, including 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; and/or construction that reduces the integrity or significance of important resources on the site or in the vicinity.

(b) 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;
- 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 can provide information which is both of demonstrable public interest and useful in

addressing scientifically consequential and reasonable archaeological research questions;

- 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 has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind; and
- 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 at least 100 years old⁴¹ and possesses substantial stratigraphic integrity.

In assessing impacts related to cultural resources in this section, the City will use Appendix G as the thresholds of significance. The factors identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

b. Methodology

The Cultural Resources Report provided in Appendix D.1 of this Draft EIR was prepared using sources related to the development of the Project Site. These include primary and secondary sources related to the development history of the Project Site and vicinity. The Cultural Resources Report was also prepared using historic permits for the Project Site, the Los Angeles Historic Resources Inventory website, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, local histories, and previous evaluations of the Project Site and vicinity.

Under CEQA, the evaluation of impacts to historic resources requires 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. A “substantial adverse change” in the significance of an historical resource is an alteration that materially impairs the physical characteristics that convey its historical significance and justify its eligibility for listing.

To address potential impacts associated with archaeological resources, formal records searches were conducted to assess the archaeological sensitivity of the Project

⁴¹ 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.

Site and vicinity. In addition, an evaluation of existing conditions and previous disturbances 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.

c. Project Design Features

(1) Project Design Features

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

(2) Relevant Project Characteristics

The Project involves rehabilitation of the Attie Building, including restoration of storefronts based on historic photographs. As discussed in the Cultural Resources Report, no physical evidence of the historic storefronts exists, and no physical evidence of earlier storefronts was revealed.⁴² Existing contemporary storefronts are proposed to be removed, including removal of contemporary signage. As part of the Project, the cornice line above the storefronts is proposed to be continued from Wilcox Avenue along Hollywood Boulevard. At the corner, the fluted pier would be extended to the ground. The Hollywood Boulevard elevation would be restored to a three-bay configuration with new sign bands above each of the three bays. Inset entrances will be placed within each bay with display windows at the sidewalk line. A low bulkhead would run along the base of the storefronts. Display windows would also be restored along the north side of the west elevation. Storefront surrounds would be clad in masonry. Terra cotta spandrel panels, which are currently covered or have been removed by existing contemporary signage, would also be restored or recast, based on the pattern evident along the west elevation. Terra cotta cladding throughout the building envelope would be cleaned and repaired as necessary. Window sash and frames would be stripped and repaired as necessary and would be repainted an olive-green color, as described in the Cultural Resources Report. Along the west elevation, the “You are the Star” mural is proposed to be retained, while glass block surrounding the entrance to the second floor would be removed. Finishes in interior retail spaces would be removed and rebuilt with contemporary materials. Roof skylights would be retained and restored.

A new, one-story, commercial building is proposed to replace 6430–6434 Hollywood Boulevard building immediately adjacent to the Attie Building. The new building would be contemporary in style and is proposed to be approximately 34 feet high, aligning with the

⁴² GBG Geotechnics USA Inc. undertook non-destructive evaluation of the Attie Building to determine if any historic fabric of the earlier storefronts is extant hidden behind existing materials. Results indicated that there was not any extant historic fabric.

adjacent Attie Building. The new building would be divided into three bays by simple pilasters with the main entrance inset in the center bay at grade. Thin fins are proposed to break up glazing on the first and second floors. The cornice and pilasters separating bays would be finished in white marble.

As part of the Project, the 1624–1626 Wilcox Avenue and 1636–1644 Wilcox Avenue buildings are proposed to be demolished and replaced with a new, mixed-use building constructed along Wilcox Avenue. The new building would be 11 stories high along the north elevation set back from Hollywood Boulevard (or 125 feet) and four stories along the Wilcox Avenue (or 160 feet). The Project includes five parking levels: two subterranean, one at-grade level, and two above-grade levels along the east elevation. The new building is proposed to be contemporary in style with floors grouped in pairs with strong horizontal elements. This grid steps out from the plane of the building with nearly continuous fenestration behind. The building is proposed to be clad in white fiber cement with colored vertical bands spanning between paired floors. Commercial spaces and residential pedestrian access would be located along the west elevation facing Wilcox Avenue, along with vehicle parking access. A connection to the new commercial building on Hollywood Boulevard would occur at the fourth floor of the mixed-use building, with a pool deck located on the roof of the new commercial building. Above the third floor, units would be arranged along a U-shaped, double-loaded corridor. A roof deck is proposed for the north elevation of the 12th floor.

Project grading is expected to include excavations for construction of the proposed subterranean parking levels. Such excavations would extend to approximately 40 feet in depth, which would be a greater depth than previous excavations on the Project Site.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Direct Impacts

As discussed above, the only historic resource on the Project Site is the Attie Building. As the buildings located at 6430–6434 Hollywood Boulevard, 1624–1626 Wilcox Avenue, and 1636–1644 Wilcox Avenue have been identified as ineligible for designation, either individually or as part of the Hollywood Boulevard Commercial and Entertainment District, demolition of such buildings would not constitute a direct impact on historic resources.

As discussed in detail in the Cultural Resources Report, rehabilitation of the Attie Building and restoration of the storefronts would conform to Secretary of the Interior's Standards for Rehabilitation. Specifically, in conformance with Standard for Rehabilitation No. 1, the Attie Building would be used as it was historically, with retail on the ground floor and offices on the second floor. In conformance with Standard for Rehabilitation No. 2, the historic character of the building would be retained and preserved. No distinctive materials would be removed; rather, contemporary materials, such as contemporary signage, would be removed to reveal historic material. Through study of historic photographs and extensive non-destructive testing, the Project would provide for accurate composition of the storefronts from the 1931–1939 period of significance. While there is some evidence of deeply inset display windows at the east storefront, these alterations likely occurred in the late 1940s. This alteration is outside the period of significance and has not taken on significance over time. Similarly, interior retail spaces do not retain any distinctive materials. Furthermore, in conformance with Standard for Rehabilitation No. 3, no changes would be added that create a false sense of historic development. Restoration of storefronts would be based on careful study of historic photographs (see specifically Historic Photographs 1–6 in Attachment D of the Cultural Resources Report included as Appendix D.1 of this Draft EIR). In conformance with Standard of Rehabilitation No. 4, changes to the property that have acquired historic significance, specifically the mural along the west elevation, would be retained and preserved. In conformance with Standard of Rehabilitation No. 5, distinctive materials, including the terra cotta cladding, would be preserved, cleaned, and repaired as necessary. In addition, window sash and frames would be stripped of paint, repaired as necessary, and painted a color from the building's period of significance. In conformance with Standard of Rehabilitation No. 6, deteriorated historic features, such as missing spandrel panels behind contemporary signage, would be replaced to match the existing spandrel panels in design, material, color, and texture. In conformance with Standard of Rehabilitation No. 7, the building would be cleaned using the gentlest means possible. In conformance with Standard of Rehabilitation No. 9, new masonry storefront surrounds would be compatible with other materials used throughout the building but differentiated from the old.⁴³

Removal of a non-contributing resource and construction of a new, one-story commercial building adjacent to the Attie Building at 6430–6434 Hollywood Boulevard, would also conform with the Secretary's Standards and would not have a direct impact on the Hollywood Boulevard Commercial and Entertainment District. As noted above, due to multiple and substantial alterations, the building at 6430–6434 Hollywood Boulevard does not retain any semblance to how it looked historically when it was constructed in 1931, or even from any other date during the period of significance for the Hollywood Boulevard

⁴³ *Standard of Rehabilitation No. 8, which focuses on archaeology, and Standard of Rehabilitation No. 10, which focuses on additions, do not apply to rehabilitation of the Attie Building.*

historic district. In fact, due to these alterations, the building at 6430–6434 Hollywood Boulevard no longer has any visual relationship to its earlier appearance and can be read as having had a damaging impact on the historic district.⁴⁴ Rehabilitation standards 9 and 10 deal specifically with new additions and the proposed new building at 6430–6434 Hollywood Boulevard meets both standards. The new building is proposed to be compatible with surrounding retail buildings, specifically the Attie Building, in size, scale, proportion, and massing, in conformance with Standard 9. The building would align in height with the Attie Building and the rhythm of three bays separated by pilasters is informed by the Attie Building. However, the design is contemporary, differentiating it from surrounding historic buildings and not competing architecturally with contributing resources to the historic district. In addition, in conformance with Standard 10, the new building could be removed in the future without destroying the essential form and integrity of the historic district.

Therefore, the Project would not directly impact or cause a substantial adverse change in the significance of the Attie Building. Rather, rehabilitation of the Attie Building, and restoration of the storefronts and other missing features, would have a beneficial impact on the building, as well as the Hollywood Boulevard Commercial and Entertainment District as a whole by restoring a lost feature. As many historic storefronts have been substantially altered on Hollywood Boulevard, restoration of the storefronts at the Attie Building would serve as an example to other buildings. Accordingly, direct impacts to historic resources would be less than significant.

(b) Indirect Impacts

As the proposed development consists of new construction immediately adjacent to identified historic resources, specifically the Hollywood Boulevard Commercial and Entertainment District as a whole and the Attie Building specifically, there is the potential for indirect impacts to the setting of historical resources. In general, CEQA describes an indirect impact as one that results from the “...alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1)). For the Project to have an indirect impact, it would have to destroy the setting to such a degree that the Attie Building would no longer be eligible as a contributing resource to the historic district.

As described above, within the vicinity of the Project Site, Hollywood Boulevard consists of commercial and mixed-use buildings that vary greatly in height (i.e., from one to 12 stories). In addition, the new 10-story Dream Hotel development was recently

⁴⁴ See historic photographs in Attachment D of the Cultural Resources Report included as Appendix D.1 of this Draft EIR.

completed located near the Project Site, mid-block on Selma Avenue between Wilcox Avenue and Cahuenga Boulevard. While the Project's proposed new building along Wilcox Avenue would also be considered tall with 11 to 15 stories, it would not be out of scale with the varied heights along Hollywood Boulevard. Such varied heights are attributed to contributing resources to the National Register District, including the radio towers atop the Hollywood Pacific Theater across Hollywood Boulevard from the Project Site, the seven-story Security Trust Building at the northeast corner of Hollywood Boulevard and Cahuenga Boulevard, and the 12-story Guaranty Building near the northeast corner of Hollywood Boulevard and Ivar Avenue. Furthermore, the Project's proposed new building along Wilcox Avenue would step back from Hollywood Boulevard by constructing the tallest section at the south side of the building. Given the slope of the topography down to the south, this proposed new building would not appear taller than surrounding buildings and would not alter the varied pattern of building heights in the area. The proposed building along Wilcox Avenue would also be set apart from the Attie Building by an alley.

In addition, the proposed building would be compatible with proportions and design elements of the Attie Building. The building would continue the height of the cornice above the storefronts along Wilcox Avenue and along the cornice line of the storefronts of the new building. The paired floors of the building would be approximately the same height as the second floor of the Attie Building, which would further create visual continuity. Vertical elements of the new building would also provide continuity from the fluted terra cotta pilasters of the Attie Building. By breaking up the mass through both strong horizontal elements and colorful vertical elements, the building would not destroy the spatial relationships that characterize the Hollywood Boulevard Commercial and Entertainment District or the Attie Building, in conformance with Standard of Rehabilitation No. 9. In conformance with Standard of Rehabilitation No. 3, the proposed new building would provide a contemporary design that would not create a false sense of historic development.

As described above and in the Cultural Resources Report included as Appendix D.1 of this Draft EIR, the United States Post Office, Hollywood Station, which is individually listed in the National Register, is also one partial block south of the Project Site at the northwest corner of Wilcox Avenue and Selma Avenue. As the Post Office is significant for its architecture and signifies the federal government's recognition of Hollywood, the surrounding environs is not considered a character-defining feature of the property. Thus, such significance is unrelated to the relationship of the building to surrounding buildings. Moreover, the Post Office is surrounded by surface parking on two sides and is separated from the Project Site by Wilcox Avenue. Therefore, the Project's new one-story commercial building immediately adjacent to the Attie Building and the proposed 11- to 15-story, mixed-use building along Wilcox Avenue, which are also some distance to the north, would not pose an indirect impact to the setting of the Post Office as a historical resource.

(c) Conclusion

Based on the above, the Project would rehabilitate and restore the Attie Building in conformance with the Secretary of the Interior's Standards, while the proposed new development on Hollywood Boulevard and Wilcox Avenue would also conform with such standards. The Project would not adversely affect the significance of the Attie Building, the only historic resource on the Project Site, and would instead provide a beneficial impact to the building and the Hollywood Boulevard Commercial and Entertainment District through rehabilitation of the building and restoration of the storefronts and other missing features. In addition, the Project's development adjacent to the Attie Building and along Wilcox Avenue would not materially alter historic resources and impair their eligibility as such resources. Specifically, the new building on Hollywood Boulevard, located at 6430–6434 Hollywood Boulevard, conforms with the Secretary of the Interior's Standards 9 and 10, addressing new construction. **As such, the Project would not cause direct or indirect impacts to historic resources, including the Hollywood Boulevard Commercial and Entertainment District. Impacts to historic resources would be less than significant, and no mitigation is required.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to historic resources would be less than significant without mitigation.

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

(1) Impact Analysis

As previously discussed, the results of the archaeological records search indicate that there are no identified archaeological resources within the Project Site and that two archaeological resources are 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, encountering archaeological resources is unlikely since the Project Site has previously been graded as part of previous construction activities. However, the Project would require excavation to depths up to 40 feet below grade for construction of the subterranean parking levels, which is greater than previously excavated depths and would reach native soils. Therefore, it is possible that

archaeological resources that were not identified during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-1, 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-1 would ensure that any potential impacts related to archaeological resources would be less than significant. **Therefore, with implementation of Mitigation Measure CUL-MM-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and, as such, any potential impacts related to archaeological resources would be less than significant.**

(2) Mitigation Measures

The following mitigation measure is proposed with respect to archeological resources:

Mitigation Measure CUL-MM-1: 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.

(3) Level of Significance After Mitigation

Project-level impacts with regard to archaeological resources would be less than significant with implementation of Mitigation Measure CUL-MM-1.

Threshold (c): Would the project disturb any human remains, including those interred outside of dedicated cemeteries.

(1) Impact Analysis

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A of this Draft EIR), the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional have burial sites been identified on the Project Site. Nonetheless, as the Project would require excavation at depths greater than those having previously occurred on the Project Site, the potential exists for the Project to uncover human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. **Impacts would be less than significant and no mitigation measures are required.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to human remains would be less than significant without mitigation.

e. Cumulative Impacts

(1) Impact Analysis

As provided in Section III, Environmental Setting, of this Draft EIR, there are 107 related projects in the Project Site vicinity. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects involve a variety of residential uses (i.e., apartments and condominiums), retail, restaurant, commercial, and office uses, consistent with existing uses in the Project Site area.

Although impacts to historic resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. While the majority of

the related projects are located more than a block beyond the Hollywood Boulevard Commercial and Entertainment District, three are located within the district and an additional eight are located within one block of the historic district. The three projects within the Hollywood Boulevard Commercial and Entertainment District are Related Project No. 13, Pantages Theater Office, 6225 W. Hollywood Boulevard; Related Project No. 17, Hotel and Restaurant Project, 6381 W. Hollywood Boulevard; and Related Project No. 22, Hudson Building, 6523 W. Hollywood Boulevard. The eight projects located within one block of the Hollywood Boulevard Commercial and Entertainment District are Related Project No. 26, Mixed-Use, 1600–1610 N. Highland Avenue; Related Project No. 36, Las Palmas Residential, 1718 N. Las Palmas Avenue; Related Project No. 66, Crossroads Hollywood, 1540–1552 Highland Avenue; Related Project No. 67, Wilcox Hotel, 1717 N. Wilcox Avenue; Related Project No. 80, citizenM Hotel, 1718 Vine Street; Related Project No. 92, 1600 Schrader; Related Project No. 102, 1723 North Wilcox Residential, 1723 N. Wilcox Avenue; and Related Project No. 105, 1719 Whitley Hotel, 1719 N. Whitley Avenue. Of the related projects listed above, only one, Related Project No. 66, Crossroads Hollywood, identified impacts to historic resources. However, impacts to historic resources in that project's EIR did not identify impacts to the Hollywood Boulevard Commercial and Entertainment District.

CEQA Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or compound or increase other environmental impacts.” The Project has not been shown to have either a direct or indirect impact on historic resources. In addition, no impacts to the Hollywood Boulevard Commercial and Entertainment District were identified for either the three projects within the district or the eight projects within one block of the historic district. **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, 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 are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering archaeological resources. **Therefore, cumulative impacts to archaeological resources would be less than significant and would not be cumulatively considerable.**

(2) Mitigation Measures

Cumulative impacts with regard to cultural resources would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to cultural resources would be less than significant without mitigation.