

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, archaeological, and paleontological resources, as well as human remains. This section is based in part on the *Historic Resources Assessment* (Historic Report) prepared by Historic Preservation Consulting (November 2017) included as Appendix C.1 of this Draft EIR. The analysis of potential impacts to archaeological and paleontological resources is based on records searches included as Appendices C.2 and C.3 of this Draft EIR, respectively, as well as a review of previous, existing, and proposed on-site conditions.

2. Environmental Setting

a. Regulatory Framework

(1) Historic Resources

Historic resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historic resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, state, and local laws governing and influencing the preservation of historic resources of national, state, regional, and local significance include the National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); 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 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 (NPS), the National Register recognizes properties that are significant at the national, state, and/or local levels.

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

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

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

¹ 36 Code of Federal Regulations 60, Section 60.2.

² 36 Code of Federal Regulations 60, Section 60.4.

³ U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, p. 44.

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

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

(b) Secretary of the Interior's Standards

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

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

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

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

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

(c) California Register of Historical Resources

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

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

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

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

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

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

⁶ *California Public Resources Code, Section 5024.1(a).*

⁷ *California State Parks, Office of Historic Preservation, California Register of Historical Resources, http://ohp.parks.ca.gov/?page_id=21238, accessed January 15, 2019.*

770; or (3) are points of historical interest, which have been reviewed by the California OHP and recommended for listing by the State Historical Resources Commission. Resources that may be nominated for listing in the California Register include: individual historic resources; historic resources contributing to the significance of an 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.⁸

(d) California Environmental Quality Act

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

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

⁸ Public Resources Code, Section 5024.1(e).

(e) City of Los Angeles Cultural Heritage Ordinance

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

1. Reflect or exemplify the broad cultural, political, economic, or social history of the nation, state, or community; or
2. Are identified with historic personages or with important events in national, state, or local history; or
3. Embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style, or method of construction; or
4. Are a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.⁹

Designation recognizes the unique historical, cultural, or architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for HCM status. Buildings may be eligible for HCM status if they meet at least one of the criteria in the Cultural Heritage Ordinance and retain their historic design characteristics and materials. Unlike the National and California Registers, the Cultural Heritage Ordinance does not require properties to reach a minimum age requirement and does not identify concepts such as physical integrity or period of significance. However, although the City does not require that a resource be a certain age before it can be designated, the City of Los Angeles Department of City Planning's (DCP) Office of Historic Resources (OHR) does qualify that "enough time needs to have passed since the resource's completion to provide sufficient perspective that would allow an evaluation of its significant within a historical context."¹⁰

⁹ *Cultural Heritage Ordinance: Section 22.171.7 et seq. of the City of Los Angeles Administrative Code.*

¹⁰ *City of Los Angeles, Department of City Planning, Office of Historic Resources, Historic-Cultural Monuments, Frequent Asked Questions (FAQs), <http://preservation.lacity.org/commission/frequently-asked-questions-faqs>, accessed January 15, 2019.*

The City of Los Angeles also recognizes historic districts as Historic Preservation Overlay Zones (HPOZs).¹¹ The HPOZ is a planning tool that adds a level of protection to an area by creating a review board to evaluate proposals for alterations, demolitions, or new construction. An HPOZ is intended to include a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Contributing resources must meet at least one of the following criteria:¹²

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

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

The Los Angeles Historic Resources Survey, or SurveyLA, is conducted under the DCP's OHR. SurveyLA is the City's comprehensive program to identify and document potentially significant historic resources. Surveys conducted under SurveyLA cover the period from approximately 1865 to 1980 and include individual resources such as buildings, structures, objects, natural features, and cultural landscapes, as well as areas and districts. Archaeological resources will be included in a future survey phase. Significant resources reflect important themes in the city's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys commenced in 2010, were undertaken in phases by Community Plan Area, and were completed in 2016.¹³ 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.^{14,15}

¹¹ *Los Angeles Municipal Code Section 12.20.3*

¹² *Los Angeles Municipal Code Section 12.20.3.F.3(c).*

¹³ *City of Los Angeles, Department of City Planning, Office of Historic Resources, Field Survey Results Master Report, August 2016.*

¹⁴ *City of Los Angeles, Department of City Planning, Office of Historic Resources, SurveyLA, SurveyLA Findings and Reports, <https://preservation.lacity.org/surveyla-findings-and-reports#Survey List>, accessed January 15, 2019.*

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

(g) City of Los Angeles General Plan

The City of Los Angeles General Plan includes a Conservation Element. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes a policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.¹⁶

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 Hollywood Community Plan Area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following general policy that is relevant to cultural resources:

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

(h) Hollywood Redevelopment Project/Hollywood Redevelopment Plan

The Project Site is also located within the Hollywood Redevelopment Project area. The Hollywood Redevelopment Project area was established in 1984 by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The Hollywood Redevelopment Project's goals include "the retention, restoration and appropriate reuse of

¹⁵ City of Los Angeles, Department of City Planning, Office of Historic Resources, *HistoricPlacesLA*, www.historicplacesla.org/index.htm, accessed January 15, 2019.

¹⁶ City of Los Angeles General Plan, *Conservation Element*. September 2001; pages II-6 through II-9.

existing buildings, groupings of buildings, and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.”¹⁷ Policies and guidelines for the preservation, rehabilitation and retention of historic properties are discussed in Section 511 of the Redevelopment Plan.¹⁸

As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA/LA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations from historic surveys in 1986, 1997, and 2003 were compiled in a data table that was made available on the CRA/LA website. A more intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2010.¹⁹ It provided relevant information regarding the status of properties within the redevelopment area and is used by agencies and the community to identify potential historic resources.

(2) Archaeological and Paleontological Resources

Federal, state, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Environmental Policy Act (NEPA), National Historic Preservation Act, and CEQA are the basic federal and state laws governing the preservation of historic and archaeological resources of national, regional, state, and local significance. As archaeological resources are also considered historic resources, regulations applicable to historic resources are also applicable to archaeological resources. Federal archaeological regulations are not applicable to the Project because the Project would not require a federal permit and would not use federal money.

(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 OHP, provide guidance

¹⁷ *City of Los Angeles, Hollywood Redevelopment Plan, as first amended in May 2003 and effective July 2003, p. 3.*

¹⁸ *City of Los Angeles, Hollywood Redevelopment Plan, as first amended in May 2003 and effective July 2003, p. 34-36.*

¹⁹ *Community Redevelopment Agency, Historic Resources Survey, Hollywood Redevelopment Project Area, February 2010.*

regarding procedures to identify such resources, evaluate their importance, and estimate potential effects.

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

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

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

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

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

Paleontological resources are also afforded protection under CEQA. Appendix G of the CEQA Guidelines provides guidance relative to significant impacts on paleontological

resources, which states that a project could have a potentially significant impact on the environment if it could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

(b) Los Angeles General Plan Conservation Element

Section 3 of the Los Angeles General Plan Conservation Element, adopted in September 2001, includes policies for the protection of archaeological and paleontological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. It is also the City's policy that paleontological resources be protected for historical, cultural research, and/or educational purposes. Section 3 sets as an objective the identification and protection of significant paleontological sites and/or resources known to exist or that are identified during "land development, demolition, or property modification activities." Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.²⁰

b. Existing Conditions

(1) Project Site

The Project Site is located in the Hollywood Community Plan area and is bounded by Selma Avenue to the north, Argyle Avenue to the west, a surface parking lot and El Centro Avenue to the east, and the Hollywood Palladium Theater and Sunset Boulevard to the south. As shown in Figure IV.B-1 on page IV.B-13, the Project Site is comprised of six buildings and surface parking areas. The existing buildings currently contain retail, office, studio, and storage uses, and are grouped for the purposes of this analysis as follows:

- Building A—Two-story high retail and storage building.
- Building B—Three one- and two-story film vault buildings.
- Building C—One-story studio and office building.
- Building D—Two-story office building.

²⁰ City of Los Angeles General Plan, Conservation Element, September 2001, pp. II-6 through II-9.

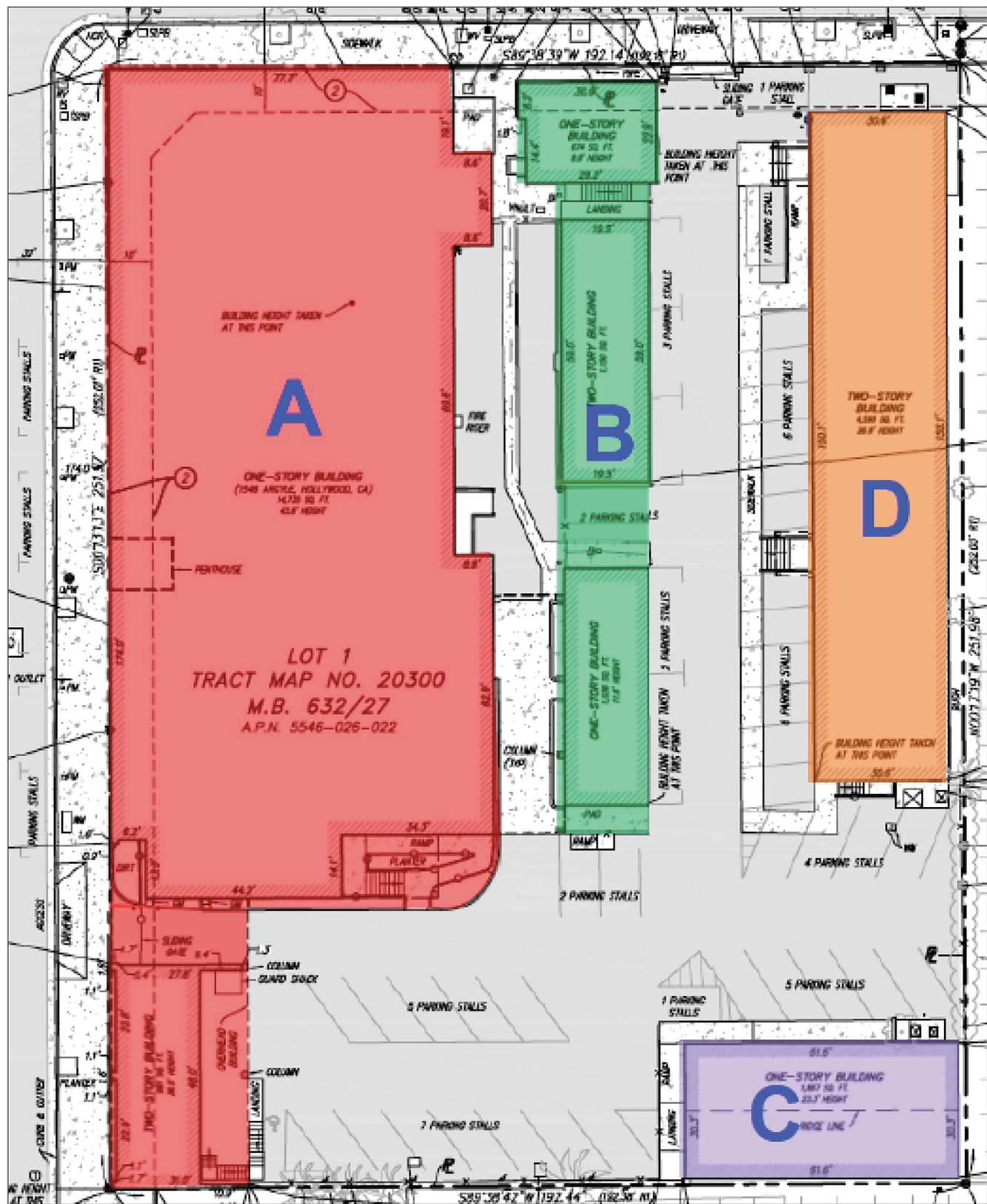


Figure IV.B-1
Existing Buildings on the Project Site

(2) Historical Background

The following is a summary of the historical information contained in the Historic Report, which is provided as Appendix C.1 of this Draft EIR.

(a) Hollywood and the Motion Picture Industry

Hollywood was annexed to Los Angeles in 1910 when it was still largely a bucolic residential community of 10,000 people. That year, director D.W. Griffith chose the gardens on the estate of French landscape and floral painter Paul De Longpre as the set for the film "Love Among the Roses," starring the then relatively unknown young actress named Mary Pickford. Two years later in 1912, the New Jersey-based Nestor Films leased the Blondeau Tavern in Hollywood for use as the City's first motion picture studio, and within three months, five other motion picture companies relocated to Hollywood. Between 1910 and 1912, movies became the primary form of mass entertainment for Americans, movie attendance doubled to nearly 20 million, and the movie industry emerged as a powerful economic force. The mild climate, variety of natural scenery, land availability, and economics led East coast film makers to relocate to the Los Angeles area and Hollywood. By the end of World War I, the United States dominated the international movie industry and Hollywood became the center of it. However, with the escalation of land prices in Hollywood and easy mobility afforded by the automobile, property in Hollywood became more valuable for other uses by the end of the 1920s, and movie studios began to relocate to less expensive communities like Culver City, Burbank and North Hollywood.

(b) Film Laboratories and Film Vaults in Los Angeles

Film laboratories for motion picture film processing were generally located in the Eastern United States prior to the 1920s. In 1920, it was estimated that about fifty percent of films produced locally were sent East for development. With the growth of the motion picture industry in Los Angeles, there was a market opportunity to establish film production laboratories in the City and streamline film production. Thus, in the 1920s, many film laboratories were constructed in Los Angeles by East coast companies, including Technicolor Motion Picture Corporation, as well as motion picture studios such as Paramount Pictures.

Film vaults were constructed as a component of film laboratories and studios for the storage of nitrate film, which had to be stored under specific conditions due to its chemical instability and tendency to spontaneously combust and decompose over time. As such, film vaults were considered ancillary for storage and were not often documented in much detail.

(c) Famous Players-Lasky Corporation

The Famous-Players Lasky Corporation was formed in 1916 by merging the companies of Adolph Zucker and Jessie Louis Lasky. Zucker started Famous Players Film

Company in 1912. Lasky started the Jesse L. Lasky Feature Play Company with himself as President, Cecil DeMille as director general, and Samuel Goldfish (later Goldwyn) as general manager. In 1916, Zukor and Lasky merged their companies to form Famous Players-Lasky Corporation, with Zukor as president, Lasky as vice president, Goldfish as chairman of the board, and DeMille in charge of production.

Famous Players-Lasky Corporation occupied the two large city blocks between Selma Avenue, Vine Street, Sunset Boulevard and El Centro Avenue. The city block east of Argyle Avenue was developed with film sets and the city block west of Argyle Avenue was developed with sound stages and other buildings for film production. By 1919, Famous Players-Lasky Corporation's two city blocks included four stages with approximately 47,000 square feet of floor space and gigantic film laboratories. The company also owned a ranch for filming near Burbank, a studio in New Jersey, and a studio in New York.

In order to control distribution of its films to maximize profits, Famous Players-Lasky Corporation bought majority shares in a company known as both Paramount-Artcraft and Paramount Distributing Company, a nationwide film distribution company. Paramount would subsequently merge with Famous Players-Lasky Corporation, and after several name changes, become Paramount Pictures.

(d) Project Site

As previously described, the Project Site is comprised of six buildings and surface parking areas. Building A was constructed circa 1922-1923 on the northwest corner of the Project Site as a new state-of-the-art film laboratory for the Famous Players-Lasky Studio. Building A was designed by architect Edwin Bergstrom and the contractor was Robert E. Millsap. The three film vault buildings that are grouped as Building B were constructed circa 1927-1931. Building C was constructed in 1937 as a work room and private storage building, and Building D was constructed between 1950 and 1955 as an office building. All six buildings have been substantially altered since their original construction.

Famous Players-Lasky Corporation owned and occupied the Project Site until 1952 when it was purchased by General Film Laboratories. In 1964, Deluxe Film Laboratory, a Fox Film Corporation laboratory, acquired General Film Laboratories, moved to the Project Site and rebranded the company as Deluxe General Inc. Deluxe General changed its name to Deluxe Laboratories, Inc. in the 1970s and remained the owner-tenant of the Project Site until 1989 when it was transferred to 20th Century Fox Film Corporation.

(3) Historical Resources

(a) Historical Resources on the Project Site

The Project Site was previously evaluated in a 2009 historic resources survey completed for the former CRA/LA. The 2009 survey contains conflicting information on the Project Site's eligibility as a historic resource, as the California Department of Parks and Recreation (DPR) form prepared for the Project Site identifies the property with California Historical Resource Status Code (CHRSC) "6Z," which means ineligible as an historical resource, while other information in the survey report identifies the property with a "3CS" status code, which means eligible for listing in the California Register. Surveys inherently provide a more cursory level of evaluation than that which is done for an historic resource assessment prepared as part of project review; therefore, the buildings on the Project Site were comprehensively evaluated in the Historic Report prepared for the Project to determine their eligibility for listing in the National Register, California Register, and as an HCM under each of the federal, state, and local criteria. Based on the evaluation contained in the Historic Report, and as summarized below, there are no historical resources present on the Project Site.

(i) Significance Evaluation

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

The Project Site was evaluated for potential significance based on its association with the early history of the Famous Players-Lasky Corporation and the motion picture industry. Building A, constructed in 1923, reflects the early history of Famous Players-Lasky Corporation at the Project Site, before its move to the current location on Melrose Avenue in 1926. Originally designed as a state-of-the-art film laboratory, Building A served as an important location for film processing, as well as innovation related to technical aspects of filmmaking. As Building A appears significant for its association with Famous Players-Lasky Corporation, as an early film laboratory, it appears eligible under Criterion A/1/1. However, as discussed below, Building A has been substantially altered, and does not retain enough integrity to convey its significance with early film history and the Famous Players-Lasky Corporation for the period of significance between 1923 and 1926. Buildings B, C, and D were all constructed after the move to the Melrose Avenue location and are therefore not significant due to any association with the Famous Players-Lasky Corporation.

The Project Site was also evaluated for potential significance based on its association with General Film Laboratories and Deluxe Film Laboratory. General Film Laboratories is not associated with the initial development of the Project Site and is likely only responsible for the construction of Building D. There is no evidence that General Film Laboratories made substantial contributions to the history of film processing. Deluxe Film Laboratory is also not

associated with the initial development of the Project Site and there is no evidence that the company's work at the Project Site contributed to film history. Therefore, the Project Site does not appear to be significant for its association with General Film Laboratories or Deluxe Film Laboratory.

The film vaults that comprise Building B were also evaluated for potential significance based on their association with the history of filmmaking in early Hollywood. Early film vaults appear to have always been constructed as part of a campus of buildings and not as stand-alone structures. Thus, it appears film vaults have always been considered ancillary to the larger use of a property as a film laboratory or studio. In order for a film vault to be individually significant, it would likely need to represent an important aspect of film storage that changed the way films were stored and had broad, wide-reaching influence on film history. The film vaults on the Project Site are not the earliest known vaults and do not appear to represent any particular moment in the evolution of film storage. In addition, their design appears to emulate that of other known film vaults constructed at the time, with utilitarian features mimicking a concrete bunker, conforming to the specific needs of film storage. The appropriate way to evaluate the film vaults is as part of the larger campus of buildings at the Project Site, which as further described below and in the Historic Report, is not identified as an historical resource. Therefore, the film vaults on the Project Site do not appear to be significant for their association with film history.

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

The Project Site was evaluated for potential significance based on its association with John M. Nickolaus, who was identified as the laboratory director of the Famous Players-Lasky Studios in a single 1921 Los Angeles Times article. While Nickolaus appears to have been a person important in our past for his innovations in film technology, it appears his important work took place in the 1930s while he was employed at M.G.M Studios, and there is no evidence that he made substantial contributions to the history of film while at the Project Site. Building A, the film laboratory building, was not constructed until 1923. Therefore, Nickolaus did not have any association with any of the existing buildings on the Project Site.

The Project Site was also evaluated for potential significance based on its association with Adolph Zukor and Jesse Lasky, who formed the Famous Players Lasky Corporation in 1916 and developed the buildings on-site. In 1912, Zukor began producing films, starting the Famous Players Film Company, and around the same time, Lasky's company, Jesse L. Lasky Feature Play Company, produced *The Squaw Man*, the first feature length motion picture to be filmed in Hollywood, using a barn at the corner of Selma Avenue and Vine Street, across the street from the Project Site to the west. Zukor and Lasky merged their companies in 1916, and the company initially used the Project Site as part of a larger film studio. However, these early buildings were subsequently demolished and the Project Site was developed with the existing buildings for film laboratory and storage purposes in 1922.

Famous Players Lasky Corporation then took over the companies that would become Paramount Pictures, moving operations to the existing Paramount Pictures location on Melrose Avenue in 1926. Paramount Pictures was responsible for many significant early films and has been an influential long-time film production company. Thus, though Zukor and Lasky are persons important for their work in motion pictures, due to the prolific nature of their work, there have been many buildings over time associated with them, and it does not appear the buildings on the Project Site convey either Zukor or Lasky's early work, which is more closely associated with the barn where *The Squaw Man* was filmed, as well as the buildings at the current Paramount Pictures studios on Melrose Avenue.

Based on the above, the Project Site does not appear eligible for listing in the National Register, the California Register, or as an HCM under Criterion B/2/2.

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.

The buildings on the Project Site are not significant for their architecture. None of the buildings present were designed with any particular architectural style. Additionally, the buildings have been substantially altered since their dates of construction.

The Project Site was evaluated for potential significance based on its association with architect Edwin Bergstrom, who designed Building A. Bergstrom is a person of importance in our past, as he has made substantial contributions to the field of architecture through not only his work on such buildings as the LAC+USC Medical Center and the Pentagon, but also through his leadership with the American Institute of Architects. However, Building A is not among his important work and has been dramatically altered from its date of construction, and therefore does not convey Bergstrom's original design or retain integrity. Therefore, the Project Site does not appear significant for association with architect Edwin Bergstrom.

The Project Site was also evaluated for potential significance based on its association with contractor, Robert E. Millsap, who constructed Building A. Millsap was a relatively prolific local contractor who worked on many landmark buildings in Los Angeles, but there is no evidence to suggest he was a person of importance in our past. He does not appear to have made substantial contributions that have changed the history of the field of contracting, nor does Building A appear to be among his most significant work. Therefore, the Project Site does not appear significant for association with Robert E. Millsap.

Based on the above, the Project Site does not appear eligible for listing in the National Register, the California Register, or as an HCM under Criterion C/3/3.

Criterion D/4: Has yielded, or may be likely to yield, information important in prehistory or history.

The Project Site cannot be reasonably expected to yield important information in prehistory or history. Therefore, the Project Site does not appear eligible for listing in the National Register, the California Register, or as an HCM under Criterion D/4/4.

(ii) Evaluation of Significance as a Historic District.

The Project Site was originally part of a larger, two-block campus of buildings that served as studios and offices for Famous Players-Lasky Corporation, which ultimately became Paramount Pictures. The two-block campus was first used by Famous Players-Lasky Corporation in 1913-1914, when the company utilized an existing barn at the corner of Selma Avenue and Vine Street for production of *The Squaw Man*, which became the first film to be shot in Hollywood. The block west of Argyle Avenue was subsequently developed with numerous other buildings servicing the making of films. The block east of Argyle Avenue, on which the Project Site is located, was developed with numerous village, castle, store and church film sets, along with buildings that housed offices, props, storage, and related uses. The majority of these early buildings were moved or demolished when the company moved operations in 1926. Although Building A was constructed in 1923, the other buildings on the Project Site were constructed later and are not closely associated with the early history of Famous Players-Lasky Corporation. Therefore, the existing buildings on the Project Site would not comprise a historic district.

(iii) Integrity Assessment

Integrity refers to the ability of a property to convey its significance. The National Register recognizes seven aspects or qualities of integrity: *location, design, setting, materials, workmanship, feeling, and association*. To retain integrity, a property must possess several, and usually most, of these aspects. Since Building A satisfies Criterion A/1/1 due to its association with the Famous Players-Lasky Corporation, as an early film laboratory, an integrity assessment was performed.

Although Building A retains integrity of location, it has been substantially altered and does not retain integrity of design, materials, or workmanship. Specifically, as described at page 42 of the Historic Report, the primary, street-facing elevations of Building A have been substantially altered, with reconfiguration of these facades, removal of all fenestration, addition to the southeast corner of the building, addition of the loading dock, reconfiguration of the main entrance, and recladding of exterior walls. In addition, the loss of materials and workmanship due to substantial alterations has resulted in the loss of integrity of feeling and association as an early film laboratory associated with the Famous Players-Lasky Corporation. Furthermore, while Building A has a similar relationship to Argyle Avenue and Selma Avenue as it did historically, it has lost its historic relationship with early studio

buildings, which originally comprised a larger, two-block campus on east and west sides of Argyle Avenue. Therefore, Building A does not retain integrity of setting. As such, Building A does not retain enough integrity to convey its significance as a result of alterations since its construction in 1923.

(b) Historical Resources in the Project Vicinity

The Historic Report also identified the following historical resources in the vicinity of the Project Site that are designated at the federal, state, or local levels, or have been identified as eligible for designation through survey evaluation:

- Hollywood Palladium Theater—6215 W. Sunset Boulevard. Designated as City of Los Angeles HCM No. 1130, California Landmark No. CA-5000, and listed in the National Register.
- CBS Columbia Square Studios—6121 W. Sunset Boulevard. Designated as City of Los Angeles HCM No. 947 and identified as eligible for the National Register in the 2009 CRA/LA survey and prior surveys.
- Hollywood Legion Stadium (now LA Fitness)—1628 N. El Centro Avenue. Identified as eligible for listing as a City of Los Angeles HCM in survey.
- Fonda Theatre—6126 Hollywood Boulevard. Identified as eligible for National Register in survey.
- 1616 Vista Del Mar Street. Identified as eligible for California Register and as an HCM in 2009 CRA/LA survey.
- Hollywood Boulevard Commercial and Entertainment District. Listed in the National Register in 1985.
- Home Savings and Loan—1500 Vine Street. Identified as eligible for National Register in 2009 CRA/LA survey.
- Pete's Flowers/Morgan Camera—6260 W. Sunset Boulevard. Sign identified as eligible for National Register in 2009 CRA/LA survey.
- Earl Carroll Theater—6230 W. Sunset Boulevard. Designated as City of Los Angeles HCM No. 1136 and previously identified as eligible for National Register.
- 6200 Block of Leland Way. Contributing properties to a California Register-listed historic district.

Detailed descriptions of these historical resources and their historic significance are contained in the Historic Report, which is included as Appendix C.1 of this Draft EIR.

(4) 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 30, 2017, a cultural resources records search was conducted through the South Central Coastal Information Center (see Appendix C.2 of this Draft EIR). The results of the record search indicate that a total of 34 cultural resource reports and studies have been conducted within a 0.5-mile radius of the Project Site, none of which included the Project Site.²¹ The records search also found that there are no archaeological resources located within the Project Site and one archaeological resource is located within a 0.5-mile radius of the Project Site. 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.

(5) Paleontological Resources

Paleontology is the study of fossils, which are the remains of ancient life forms. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct.

On April 21, 2017, a Project-specific paleontological records search was conducted through the Natural History Museum of Los Angeles County. The results of the paleontological records search, which are included in Appendix C.3 of this Draft EIR, indicate there are no vertebrate fossil localities that lie directly within the Project Site. In addition, the Project Site is not located in a designated Vertebrate Paleontological Site or Site Area.²² However, according to the records search, there are localities that have been identified nearby from the same sedimentary deposits that occur at depth within the Project area, as identified below.

The Project area contains surface deposits that consist of soil on top of older Quaternary Alluvium, derived as alluvial fan deposits from the Hollywood Hills immediately to the north. The uppermost layers of these deposits in this area typically do not contain significant fossil vertebrate remains. However, to the northeast of the Project Site and east of

²¹ A 0.5-mile radius is considered industry standard for a records search.

²² Los Angeles Citywide General Plan Framework Environmental Impact Report, Section 2.15 Cultural Resources, Figure C-2, January 1995.

the Hollywood Freeway (US-101), four vertebrate fossil localities have been collected from late Pleistocene deposits at depths between 47 and 80 feet below the surface along Hollywood Boulevard between Highway 101 and Western Avenue during excavations for the Metro Red Line tunnels and stations. These fossil specimens included horse, *Equus*, bison, *Bison*, camel, *Camelops*, and mastodon, *Mammut americanum*.

In the Hancock Park region south-southwest of the Project Site near the Rancho La Brea asphalt deposits, fossil vertebrates have been recovered at shallower depths. The closest vertebrate fossil locality in the older Quaternary sediments at shallow depth is LACM 5845, which is located southeast of the Project Site near the intersection of Western Avenue and Council Street. This locality produced a fossil specimen of mastodon, *Mammutidae*, at a depth of only 5 to 6 feet below the surface. In addition, near the intersection of Madison Avenue and Middlebury Street, the vertebrate fossil locality LACM 3250 produced a fossil specimen of mammoth, *Mammuthus*, at a depth of 8 feet below street level. Furthermore, southwest of the Project Site and near the intersection of Sierra Bonita Avenue and Oakwood Avenue, the vertebrate fossil locality LACM 3371 produced fossil specimens of bison, *Bison antiquus*, at a depth of 12 feet below the surface.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

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

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

Threshold (c): Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.²³

²³ Subsequent to the publication of the Initial Study, provided in Appendix A, of this Draft EIR, the California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018. In the new CEQA Guidelines, the threshold regarding paleontological resources has been moved to the Geology and Soils section. However, Geology and Soils was scoped out in its entirety as part of the Initial Study, so the threshold will be evaluated in this section.

Threshold (d): *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 criteria to evaluate cultural resources impacts:

(a) Historic Resources

- If the project would result in a substantial adverse change in the significance of an historical 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-old and possesses substantial stratigraphic integrity.²⁴

²⁴ 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 (Footnote continued on next page)

(c) *Paleontological Resources*

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

In assessing impacts related to cultural resources in this section, the City will use Appendix G as the thresholds of significance. The criteria 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.

(3) Secretary of the Interior's Standards

Under CEQA, the key issue relates to how a proposed development may impact the potential eligibility of a structure(s) or a site for designation as an historic resource. The Secretary's Standards were developed by the United States Department of the Interior as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (36 CFR Section 67.7). Similarly, the City's Cultural Heritage Ordinance provides that compliance with the Secretary's Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to Historic-Cultural Monuments (Los Angeles Administrative Code Section 22.171.14. a.1). Therefore, the Secretary's Standards are used for regulatory approvals for designated resources but not for resource evaluations. Similarly, CEQA recognizes the value of the Secretary's Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a "safe harbor" by providing either a categorical exemption or a negative declaration for a project which meets the Secretary's Standards (CEQA Guidelines Section 15331 and 15064.S(b)(3)).

According to Appendix G, the appropriate threshold of significance is whether a project causes a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5. That Section provides a detailed definition of "substantial adverse change." In summary, the definition of substantial adverse change and, hence, the threshold of significance is whether a project demolishes or materially alters in an adverse manner the physical characteristics that convey historical significance of the resource or that justify its eligibility for the California Register or a local register such as the list of Historic-Cultural Monuments. In other words, if a project would render an eligible historic resource ineligible then there would be a significant adverse effect under CEQA. This refinement to the factors listed in the City's CEQA Thresholds Guide has been reviewed and

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.

concurred with by the City of Los Angeles Planning Department's Office of Historic Resources.²⁵

b. Methodology

The analysis of impacts related to historic resources is based on the Historic Report prepared by Jenna Snow. Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historically significant resource or resources, and if so; (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the resource or resources.

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

c. Analysis of Project Impacts

(1) Project Design Features

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

(2) Project Impacts

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

(a) Direct Impacts

The Project would require the demolition of the six existing buildings and surface parking areas in order to construct the proposed seven-story mixed-use building. As previously discussed, none of the existing buildings are listed or eligible for listing in the National Register, California Register, or as an HCM. Therefore, there are no historical resources on the Project Site.

²⁵ Snow, Jenna, *Historic Resource Assessment 1546 Argyle Avenue*, November 2017, p. 63. Included as Appendix C.1 of this Draft EIR.

Construction activities including excavation, impaction, pile driving, shoring, etc. may have the potential to directly impact the Hollywood Palladium Theater, which is located immediately south of the Project Site. However, a new development (Related Project No. 49) is proposed to be constructed on the northern portion of the Hollywood Palladium Theater property. This new development would be located between the Project Site and the Hollywood Palladium Theater, and would be primarily impacted by construction activities on the Project Site. Thus, Project construction activities would not be expected to directly impact the Hollywood Palladium Theater. Project construction activities also would not be expected to directly impact the Hollywood Palladium Theater if Related Project No. 49 is not constructed by the time Project construction begins, due to the distance between the proposed Project building and the Hollywood Palladium Theater, which is approximately 100 feet. No other historical resource is close enough to the Project Site for Project construction activities to result in direct impacts. As such, the Project would not cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5.

(b) Indirect impacts

The Historic Report evaluates the potential for the Project to result in indirect impacts to historical resources in the vicinity of the Project Site. CEQA Guidelines Section 15064.5(b)(1) 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 resource would be materially impaired." Potential indirect impacts of the Project on the setting of the 10 identified historical resources in the vicinity of the Project Site are summarized below.

The area surrounding the Project Site is developed with a variety of historic and modern low-, mid-, and high-rise buildings. Low-scale buildings include the one-story single-family homes built in the 1920s and the historic Hollywood Palladium Theater constructed in 1940. High-rise buildings include the 22-story Sunset Media Center at 6255 W. Sunset Boulevard (constructed in 1972), and the 22-story Hollywood Proper Residences, located on the CBS Columbia Square site at 6121 W. Sunset Boulevard (completed circa 2016). The Project would construct a building that is similar scale and mass to the 12-story W Hotel located at 6250 Hollywood Boulevard (completed circa 2010) and The Camden, an eight-story mixed used building located at 1540 Vine Street (completed circa 2016). Given the varied pattern of development in the Project vicinity, the introduction of the proposed building on the Project Site would not substantially change the existing look and feel of the surrounding area to the extent that the significance of any nearby historical resource would be impaired. Based on the evaluation below, the Project would not result in indirect impacts to any of the identified historical resources. As such, the Project would not cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5.

(i) Hollywood Palladium Theater

The Hollywood Palladium Theater is surrounded by varied types of buildings, including taller, contemporary architecture. The theater's setting was not identified as a character-defining feature of the property when it was listed on the National Register in 2016. The Hollywood Palladium Theater is located across Argyle Avenue from the 22-story Sunset Media Center, and across El Centro Avenue from the 22-story Hollywood Proper Residences. The Project is smaller in scale and mass than of many buildings in the surrounding area. Given the existing high-rise construction and varied landscape of development in the area, the Project would not substantially change the relationship of the Hollywood Palladium to its setting such that the significance of the historical resource would be materially impaired. Therefore, the Project would not result in alterations to the setting of this historical resource such that its significance would be materially impaired, and would not result in an indirect impact to the Hollywood Palladium Theater.

(ii) CBS Columbia Square

CBS Columbia Square site has been improved with the 22-story Hollywood Proper Residences. Despite the construction of a large high-rise on-site, CBS Columbia Square remains an historical resource. Thus, it can be assumed that the Project, which would develop a comparatively smaller building on a nearby property, would not substantially alter the setting of the surrounding area such that the significance of CBS Columbia Square would be materially impaired. Furthermore, the Project would not be readily visible from the historic portion of CBS Columbia Square, which fronts Sunset Boulevard, and would therefore not alter the setting of this historic resource such that its significance would be materially impaired. Therefore, the Project would not result in an indirect impact to CBS Columbia Square.

(iii) Hollywood Legion Stadium

The Hollywood Legion Stadium is located approximately 500 feet northeast of the Project Site and there is generally no visibility between the two sites. Therefore, the Project would not alter the setting of the Hollywood Legion Stadium such that its significance would be materially impaired, and would not result in an indirect impact to this historical resource.

(iv) Fonda Theatre

The Fonda Theatre is located approximately 750 feet northeast of the Project Site and there is no visibility between the two sites. Therefore, the Project would not alter the setting of the Fonda Theatre such that its significance would be materially impaired, and would not result in an indirect impact to this historical resource

(v) 1616 Vista del Mar Street

1616 Vista del Mar Street is significant as a multi-family residential building and not for its architecture. The setting of 1616 Vista del Mar Street has not been identified as a character-defining feature and has been altered considerably since the building was constructed in 1922. In addition, the residential building is located approximately 330 feet northeast of the Project Site and would have limited visibility of the Project. Therefore, the Project would not alter the setting of 1616 Vista del Mar Street such that its significance would be materially impaired, and would not result in an indirect impact to this historical resource.

(vi) Hollywood Boulevard Commercial and Entertainment District

The Hollywood Boulevard Commercial and Entertainment District, consisting of numerous contributing structures located along Hollywood Boulevard, is located approximately 600 feet northwest of the Project Site. Due to the number of intervening high-rise buildings, there is no visibility between the District and the Project Site. Furthermore, the Project Site is not located in the immediate surroundings of the District, or any of its contributing buildings. Therefore, the Project would not alter the setting of the District or any of its contributors such that their significance would be materially impaired, and would not result in an indirect impact to this historical resource.

(vii) Home Savings and Loan

Home Savings and Loan is located at the northeast corner of Sunset Boulevard and Vine Street, approximately 650 feet southwest of the Project Site. Due to the number of intervening high-rise buildings, there is no visibility between the two sites. Furthermore, the Project is not located in the immediate surroundings of the Home Savings and Loan building. Therefore, the Project would not alter the setting of the Home Savings and Loan building such that its significance would be materially impaired, and would not result in an indirect impact to this historical resource.

(viii) Pete's Flowers/Morgan Camera

Pete's Flowers/Morgan Camera is located approximately 680 feet southwest of the Project Site. Due to the number of intervening high-rise buildings, including the Sunset Media Center at 6255 W. Sunset Boulevard, there is no visibility between the two sites. Furthermore, the Project Site is not located in the immediate surroundings of the Pete's Flowers/Morgan Camera building. Therefore, the Project would not alter the setting of the Pete's Flowers/Morgan Camera building such that its significance would be materially impaired, and would not result in an indirect impact to this historical resource.

(ix) Earl Carroll Theater

While there is visibility between the Earl Carroll Theater and the Project Site, the Earl Carroll Theater is located approximately 680 feet south of the Project Site, and is located on Sunset Boulevard, a wide, busy, commercial thoroughfare. The setting of the Earl Carroll Theater does not relate in any way to the Project Site. Therefore, the Project would not alter the setting of the Earl Carroll Theater such that its significance would be materially impaired, and would not result in an indirect impact to this historical resource.

(x) 6200 Block of Leland Way

The 6200 Block of Leland Way is located approximately 1,000 feet south of the Project Site. There is no visibility between the 6200 Block of Leland Way and the Project Site. Furthermore, the Project Site is not located in the immediate surroundings of the 6200 Block of Leland Way. Therefore, the Project would not alter the setting of the 6200 Block of Leland Way such that its significance would be materially impaired, and would not result in an indirect impact to this historical resource.

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

As previously discussed, the results of the archaeological records search indicate that there are no identified archaeological resources within the Project Site and one archaeological resource is located within a 0.5-mile radius of the Project Site. While these findings do not preclude the potential for an archaeological site to be identified during construction activities associated with the Project, it is unlikely since the Project Site has previously been graded as part of previous construction activities, including the construction of a basement beneath Building A. However, excavation to construct the Project's subterranean parking garage would extend to a depth of approximately 50 feet below grade, which is greater than previously excavated depths. Therefore, it is possible that archaeological resources that were not identified during prior construction or other human activity may be present. 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.

Threshold (c): Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As previously discussed, the Project Site is developed with six buildings and surface parking areas. As discussed in the Initial Study (Appendix A of this Draft EIR), there are no unique geological features present on the Project Site. The records search conducted for the Project Site indicates that there are no previously encountered fossil vertebrate localities located within the Project Site. The closest identified localities in proximity to the Project Site are LACM 6297-6300, collected at depths between 47 and 80 feet below the surface along Hollywood Boulevard between the US-101 Freeway and Western Avenue. While the Project Site has been subject to grading and development in the past, excavation to construct the subterranean parking garage would extend to a depth of approximately 50 feet below grade, which is greater than previous excavation depths to construct a basement under Building A. Thus, it is possible that paleontological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-2, a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event paleontological materials are encountered, the paleontologist 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-2 would ensure that any potential impacts related to paleontological resources would be less than significant. As such, the Project would not be expected to directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

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

As discussed 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. No known traditional burial sites have 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. Therefore, the Project would not be expected to disturb any human remains, including those interred outside of dedicated cemeteries. Project impacts with respect to Threshold (d) would be less than significant and mitigation measures are not required. Refer to Section IV.H, Tribal Cultural Resources, of this Draft EIR for further discussion and analysis of tribal cultural resources.

4. Cumulative Impacts

As provided in Section III, Environmental Setting, of this Draft EIR, there are 108 related development projects in the Project Site vicinity, as well as the Hollywood Community Plan Update. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects involve a variety of residential uses (i.e., apartments and condominiums), retail, restaurant, commercial, and office uses, consistent with existing uses in the Project Site area.

Although impacts to historic resources tend to be site-specific, cumulative impacts would occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As discussed above, there are no historical resources located within the Project Site. All Project development would remain onsite and, as discussed above, indirect impacts to the historical resources in the vicinity of the Project Site would not occur. The Project would not substantially change the existing look and feel of the surrounding area to the extent that the significance of any nearby historical resource would be impaired and impacts would be less than significant. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to potential cumulative impacts related to archaeological resources, paleontological resources, and human remains, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources, paleontological resources, and/or human remains 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 and/or paleontological resources. Therefore, cumulative impacts to archaeological resources, paleontological resources, and human remains would be less than significant and would not be cumulatively considerable.

5. Mitigation Measures

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.

Mitigation Measure CUL-MM-2: A qualified paleontologist 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 paleontologist 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 paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist 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 paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

6. Level of Significance After Mitigation

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