

## 4.0 ENVIRONMENTAL IMPACT ANALYSIS

### C. CULTURAL RESOURCES

#### 2 HISTORICAL RESOURCES

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##### 1. INTRODUCTION

This section evaluates potential Project impacts on historical resources and is based on the Historical Resources Assessment Report (Assessment Report) prepared by Historic Resources Group<sup>1</sup> and included in Appendix C-3 of this Draft EIR. Project impacts on archaeological resources are evaluated in Section 4.C.1, Archaeological and Paleontological Resources, of this Draft EIR.

##### 2. ENVIRONMENTAL SETTING

###### a. Existing Conditions

The Project Site encompasses approximately 3.6 acres (154,648 square feet) of the city block bounded by Selma Avenue on the north, Sunset Boulevard on the south, El Centro Avenue on the east, and Argyle Avenue on the west. The Project is located in an urban area that serves as both a commercial center for Hollywood and the surrounding communities and an entertainment center of regional importance; as is reflected in the Site's Regional Center designation in the City's Framework Element and as a component of the Hollywood Center in the Hollywood Community Plan.

Constructed in 1940, the Palladium building is located within the Project Site and is a Streamline Moderne-style entertainment venue designed by architect Gordon B. Kaufmann for Norman Chandler of the *Los Angeles Times*. The theater consists of a one-story structure with a full-height interior mezzanine; and partial second floor on the south side of the building. The building is constructed of board-formed concrete and is known for its distinctive curved horizontal marquee and vertical blade sign tower. A detailed description and evaluation of the Palladium is provided in the Assessment Report included in Appendix C-3. The Palladium is historically significant for its association with the development of recreation and entertainment venues in Los Angeles, and as an outstanding example of Streamline Moderne architecture from the 1940s designed by architect Gordon B. Kaufmann. Because the Palladium was found eligible for the National Register, California Register and as a local Historic-Cultural Monument, it is considered a historical resource for the purposes of CEQA. As discussed in Section 2.0, Project Description, of this Draft EIR, after the building fell into disrepair, the Palladium underwent a major renovation in 2007 and reopened in 2008. Today the Palladium continues to operate as a concert and event venue.

###### (1) Historical Background

###### (a) Recreation and Entertainment Venues in Hollywood and the Palladium

The Palladium building is historically significant for its association with the development of recreation and entertainment venues in Hollywood. Between 1912 and mid-1920s, the blocks surrounding Sunset Boulevard and Vine Street were the core of motion picture filmmaking in Hollywood. During the late 1920s

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<sup>1</sup> *Historic Resources Group, Historic Resources Technical Report, Palladium Residences, January 2014.*

and early 1930s the area became associated with radio, television and entertainment venues. The NBC Radio City building was built at the corner of Vine Street and Sunset Boulevard, and the CBS Columbia Square complex was located on Sunset Boulevard and Gower Street, with ABC facilities just south of Sunset Boulevard on Vine Street. Entertainment venues were developed within the midst of this entertainment-industry area because entertainment venues were a vital part of the studios' public relations. Night clubs such as the Earl Carroll Theatre, Florentine Gardens, the Palladium and others were built into this core area. These primary entertainment venues played a significant role in Hollywood's growth and development.

Attracting the best and most notable live music from its inception, the Palladium is one of the oldest operating entertainment venues in Los Angeles. The Palladium was built on part of the site of the original Famous Players-Lasky Corporation motion picture studio lot. On opening night, October 31, 1940, at least ten thousand people are believed to have filled the Palladium's dance floor and dining tables while hundreds more watched the arrivals of the day's biggest stars. Tommy Dorsey and his orchestra featured the talent of the young, up-and-coming Frank Sinatra. This was the era of the Big Bands and many of the musicians became as famous as the movie stars. Throughout the 1940s, movie stars and their fans hit the Palladium dance floor to swing to the music of Artie Shaw, Tommy Dorsey, Glenn Miller and Benny Goodman, among many others. By the early 1950s, however, the big bands were waning in popularity. The Palladium then shifted gears, welcoming charity balls, political events, auto and fashion shows, proms, and concerts. In the 1960s, it got a boost from popular bandleader Lawrence Welk, who broadcast his long-running weekly television program from the ballroom. Over the years, the Palladium's operators demonstrated their willingness to change with the times, which accounts in large part for the venue's longevity. From the 1970s up to the present day, operators have continued to bring in diverse musical acts attracting new audiences.

Many of these entertainment venues no longer exist either in Hollywood, or on the Sunset Strip in West Hollywood or in Mid-Wilshire where they were once located. Those that do, such as the Earl Carroll Theatre, Florentine Gardens, and the Palladium, are now a rare architectural building type and figure prominently in the context of the built environment of Hollywood. They belong to a special type of entertainment venue capable of holding very large numbers of patrons for social activities. Their distinguishing characteristics are primarily their interior decoration, the large size and scale of their main public spaces and their box-like exteriors.

#### **(b) Norman Chandler (1899-1973)**

During the 1930s and 1940s, Norman Chandler (1899-1973) developed several entertainment venues in Hollywood. Chandler, whose family had owned the *Los Angeles Times* since 1880, was its publisher from 1945 through 1960. At the time the Palladium was constructed, he was the General Manager and President of the *Los Angeles Times*. The Chandler family had a long and prominent role in real estate development in Los Angeles. In 1935, five years before the Palladium was completed, Norman Chandler began collaboration with architect Gordon B. Kaufmann on the construction of the Los Angeles Times building.

#### **(c) Streamline Moderne Architecture**

Following the height of the Art Deco style in the early 1930s, the Streamline Moderne style was an economic and stylistic response to the ravaging effects of the Great Depression. A new style was needed to express optimism and a brighter outlook for the future. Streamline Moderne style structures continued to suggest modern values of movement and rejection of historic precedents, but with less opulence and more restraint than the Art Deco style of the late 1920s and early 1930s. Streamline Moderne style architecture took its cue

from the emerging field of industrial design and borrowed imagery, in particular, from the ocean liner. The Streamline Moderne style of Palladium reflects the national trends of the style which reached its height during the early 1940s and continued in use into the early 1950s.

#### **(d) Architect Gordon B. Kaufmann (1888-1949)**

Architect Gordon B. Kaufmann (1888-1949) was a prolific Southern California architect and is responsible for several prominent Hollywood buildings in partnership with Chandler including the Florentine Gardens on Hollywood Boulevard (1938) and the Palladium (1940). He also designed the Earl Carroll Theatre on Sunset Boulevard (1938). Kaufmann was born and educated in London, England, graduating from the London Polytechnic Institute. Kaufmann's professional career in Los Angeles included a partnership in the firm Johnson, Kaufmann, Coate, which was responsible for the design of many notable public buildings in Los Angeles. Kaufmann later opened and managed his own office.

Kaufmann's body of work follows stylistic patterns distinctive to Southern California where Mission, Mediterranean and period revival styles of the 1920s shift towards Art Deco, Moderne, and Modernist styles in the 1930s and 1940s. With a portfolio as broad in type and style as the Hoover Dam, Edward L. Doheny, Jr.'s Greystone Mansion in Beverly Hills, Claremont College buildings, Scripps College's original campus, the Santa Anita Race Track, the Times-Mirror Building, the Athenaeum at Cal Tech, and countless homes, Kaufmann is an architect of unique distinction.

#### **(2) Identified Historical Resources in the Project Vicinity**

In the Project vicinity (an approximately 0.30-mile radius), there are five previously identified individual historical resources that could be indirectly affected by the Project as the result of alteration of their immediate surroundings. Only one previously identified historical resource, CBS Columbia Square, is listed on the California Register and is a Los Angeles Historic-Cultural Monument. None of the four other previously identified historical resources are listed on the National Register or California Register or listed as California Points of Historical Interest or California Historical Landmarks. A description of the historic resources in the vicinity is included in the Assessment Report in Appendix C-3 of this Draft EIR. A summary table listing historical resources identified in the Project vicinity is provided in the Assessment Report in Table 1, Historic Resources Within and Adjacent to the Project Site, and is summarized below.

There is one historical resource which is eligible for the National Register, and listed in the California Register and as a Los Angeles-Historic Cultural Monument in the Project vicinity:

- CBS Columbia Square (1937), 6215 Sunset Boulevard; Historic-Cultural Monument Number 947 designated on March 10, 2009; individual property determined eligible for the National Register by Part I Tax Certification and listed in the California Register (CHR Status Code 2S3) (Historic Preservation Certification Application Part 1 – Evaluation of Significance, December 2012); located on the block east of the Project: direct views of the Project.

There are three historical resources that are individually eligible for listing in the National Register in the Project Vicinity:

- Earl Caroll Theatre (1938), 6230 Sunset Boulevard; individually eligible for listing in the National Register (CHR Status Code 3S) (2010 CRA Historic Resources Survey); located directly south of the Project across Sunset Boulevard: direct views of the Project.
- Home Savings and Loan (1938), 1500 Vine Street; individually eligible for listing in the National Register (CHR Status Code 3S) (2010 CRA Historic Resources Survey); located at the northeast corner of Vine Street and Sunset Boulevard, one block to the west of the Project: no views of the Project.
- Morgan Camera Shop (1967), 6260-62 Sunset Boulevard; individually eligible for listing in the National Register (CHR Status Code 3S) (2010 CRA Historic Resources Survey); located on Sunset Boulevard across the street and just southwest of the Project: direct views of the Project.

There is one historical resource which is individually eligible for listing as a City Historic-Cultural Monument in the Project Vicinity:

- Hollywood Legion Stadium (1938), 1628 El Centro Avenue; individually eligible for listing in the local register (CHR Status Code 5S2)(2011 Historic Resources Inventory); located northeast of the Project on El Centro Avenue across Selma Avenue: limited distant view of Project.

### **(3) Historical Resources Identified within the Project Site**

The Palladium building has been found eligible for listing in the National Register on two separate occasions. As part of the 1979 Hollywood Revitalization survey, the Palladium was assigned a CHR Status Code of 3S or “Appears eligible for NR as an individual property through survey evaluation.” In February 2010, during the Hollywood Redevelopment Project Area survey, the Palladium was again assigned a CHR Status Code of 3S.

#### **(a) Statement of Significance**

For the purposes of this EIR, the Palladium was reevaluated. The current architectural description and significance evaluation is included in the Assessment Report in Appendix C-3 in this Draft EIR. Under Criterion A, the Palladium is significant for its association with the development of recreation and entertainment venues in Los Angeles. Under Criterion C, the Palladium is eligible as an excellent example of Streamline Moderne architecture in Los Angeles and as an example of the work of notable Southern California architect Gordon B. Kaufmann. Therefore, the Assessment also found the Palladium eligible for listing in the California Register and as a local Historic-Cultural Monument.

#### **(b) Character-Defining Features Analysis**

##### ***(i) Contributing Exterior Features***

- All exterior facades are substantially intact and were originally built to the design of Gordon B. Kaufmann.
- The East façade facing El Centro Avenue is almost entirely unchanged with respect to Kaufmann’s original design of board-formed concrete articulated by reveals, service doors, and metal-framed windows for the service spaces at the lower and upper levels.
- The rear North façade is also in a substantially original condition consisting of board-formed concrete, with few openings, with the exception of the CMU wall addition from 2008 and all of the interior spaces, materials, and features that are a part of this addition.

- Significant South façade features include walls, storefront openings, marquee, blade sign and miscellaneous neon signs, open grid screen with halo lighting, two dancing figure sculptures with neon outlines, poster and display cases, blue “Vitalite”-type spandrel glass wall finish.
- West (side) façade significant features include walls, door openings, canopy, and perforated screen wall between the “drop off” area and the surface parking area at the southwest corner of the property.
- East (side) façade significant features include board-formed poured-in-place concrete walls articulated with cast-in vertical reveals, window and door openings.
- North (rear) façade significant features include poured-in-place concrete walls.
- Bowstring roof shape.
- Functionally flat roofs behind parapets.

**(ii) Contributing Interior Features and Spaces**

- Entrance foyer spatial configuration, ceiling configuration, and terrazzo floor
- Main lobby space and configuration
- Main lobby stairs (two sets)
- Argyle lobby (rotunda), ceiling materials and finishes, and decorative reliefs, bar
- Ballroom, with original hardwood floor, floor underneath stage
- Stage “ante proscenia” columns and existing decorative features (currently draped)
- East terrace floor and low walls
- West terrace floor and low walls
- East balcony floor, railing (low wall) with lighting cove
- West balcony floor, railing (low wall) with lighting cove
- Acoustical plaster ceilings and configurations, ceiling diffusers, in ballroom spaces
- “Champagne Room”

**(iii) Non-Contributing Exterior Features and Spaces**

- On the west façade facing Argyle Avenue, the “rotunda” entrance doors and ticket booths have been altered, but the rest of the features are as originally designed and constructed.
- Aluminum frame and glass storefront systems in south facade
- Doors under marquee in south facade (originally, and in the period of significance, there were no doors at the recessed, covered foyer; this entry space was open to the sidewalk on Sunset Boulevard)
- Linear “marquee” type sign box attached at the top of the west facade canopy fascia
- CMU wall addition at the central portion of the north (rear) elevation and all of the interior spaces, materials, and features that are a part of this addition.
- Exterior exit stairway on the west elevation, with security “green-screen” type enclosure

- Loading dock at east side of north façade; there were alterations to the loading area as part of the project that was completed in 2008
- Exterior exit stairway on the west side of north facade

**(iv) Non-Contributing Interior Features and Spaces**

- Ballroom: ramps added for accessible path to hardwood floor
- Lobbies: paint, carpet, wall-mounted lighting fixtures
- Chandeliers in ballroom
- Public toilet configurations, finishes, partitions, fixtures, fittings, and accessories
- Support spaces along east wall
- Support spaces along north wall
- Office and administrative spaces on second floor
- Acoustical panels and finish patterns on south wall of ballroom
- Non-public spaces including back-of-house offices, back-stage areas, equipment storage, food and beverage service, and ticketing/administration spaces

**(c) Setting**

In its historic setting, the primary South façade was the most public elevation, visible from Sunset Boulevard. The West façade was visible from Argyle Avenue and obliquely visible from Sunset Boulevard (partially obscured by a gas station (not currently existing) at the corner of Sunset Boulevard and Argyle Avenue), and had another main entrance oriented to vehicular drop-off and parking. The East façade has always been fully visible from El Centro Avenue and obliquely visible from Sunset Boulevard. The rear North façade is obliquely visible from Argyle Avenue and El Centro Avenue, but because it is a concrete wall with no main entrances and no decorative features, it contributes less to the character of the building than the other elevations.

**b. Regulatory Framework**

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities.

**(1) Federal Level**

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

The National Register of Historic Places (NRHP) was established by the National Historic Preservation Act (NHPA) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for

protection from destruction or impairment.”<sup>2</sup> 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 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;
- B. It is associated with the lives of persons significant in our past;
- 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;
- D. It yields, or may be likely to yield, information important in prehistory or history.<sup>3</sup>

Districts, sites, buildings, structures, and objects that are 50 years in age must meet one or more of the above criteria and retain integrity (this is, convey their significance) to be eligible for listing. Under the National Register, a property can be significant not only for the way it was originally constructed, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.<sup>4</sup> Within the concept of integrity, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association.

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.<sup>5</sup> Determining which of these aspects are most important to a particular property requires knowing why, where and when a property is significant.<sup>6</sup> For properties that are considered significant under National Register Criteria A and B, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (“*National Register Bulletin 15*”) explains, “a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).”<sup>7</sup> In assessing

<sup>2</sup> 36 CFR Section 60.2.

<sup>3</sup> “Guidelines for Completing National Register Forms,” in *National Register Bulletin 16*, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the NRHP.

<sup>4</sup> *National Register Bulletin 15*, p. 19.

<sup>5</sup> The National Register defines a property as an “area of land containing a single historic resource or a group of resources, and constituting a single entry in the National Register of Historic Places.” A “Historic Property” is defined as “any prehistoric or historic district, site, building, structure, or object at the time it attained historic significance. *Glossary of National Register Terms*, [http://www.nps.gov/nr/publications/bulletins/nrb16a/nrb16a\\_appendix\\_IV.htm](http://www.nps.gov/nr/publications/bulletins/nrb16a/nrb16a_appendix_IV.htm), accessed June 1, 2013.

<sup>6</sup> *National Register Bulletin 15*, p. 44.

<sup>7</sup> “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic  
(Footnote continued on next page)

the integrity of properties that are considered significant under National Register Criterion C, *National Register Bulletin 15* states, “a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”<sup>8</sup>

## (2) State Level

### (a) California Register of Historical Resources

The Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation (DPR), implements the policies of the NHPA on a Statewide level. The OHP also carries out the duties as set forth in the Public Resources Code (PRC) and maintains the Historic Resources Inventory (HRI) and the California Register. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State’s jurisdictions. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

The California Register was created by Assembly Bill 2881 which was signed into law on September 27, 1992. The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”<sup>9</sup> The criteria for eligibility for the California Register are based upon National Register criteria.<sup>10</sup> Certain resources are determined by the statute to be automatically included in the California Register by operation of law, including California properties formally determined eligible for, or listed in, the National Register.<sup>11</sup>

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward;
- Those Points of Historical Interest (PHI) that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.<sup>12</sup>

Other resources which may be nominated to the California Register include:

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*character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.” Ibid, p. 46.*

<sup>8</sup> “A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.” *Ibid.*

<sup>9</sup> PRC Section 5024.1(a).

<sup>10</sup> PRC Section 5024.1(b).

<sup>11</sup> PRC Section 5024.1(d).

<sup>12</sup> *Ibid.*



- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an Historic Preservation Overlay Zone (HPOZ).<sup>13</sup>

To be eligible for the California Register, a historic resource must be significant at the local, State, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
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; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance 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. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of seven aspects of integrity similar to the National Register, location, design, setting, materials, workmanship, feeling, and association. Also like the National Register, it must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. 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. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.<sup>14</sup>

### **(3) Local Level**

#### **(a) City of Los Angeles**

The City enacted a Cultural Heritage Ordinance in April 1962 which defines City Monuments. According to the Ordinance, City Monuments are sites, buildings, or structures of particular historic or cultural significance to the City in which the broad cultural, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which

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<sup>13</sup> *PRC Section 5024.1(e)*

<sup>14</sup> *Codified in California Code of Regulations, Title 14, Chapter 11.5, Section 4852(c) which can be accessed on the internet at <http://ohp.parks.ca.gov>*

embody certain distinguishing architectural characteristics and are associated with a notable architect. These City Monuments are regulated by the City's Cultural Heritage Commission and the City Council.

### **(b) Los Angeles Cultural Heritage Ordinance**

The Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7) establishes criteria for designating local historic resources as City Monuments. A City Monument is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites:

- In which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified;
- Which are identified with historic personages or with important events in the main currents of national, State or local history;
- Which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or
- Which are a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

A proposed resource may be eligible for designation if it meets at least one of the criteria above.

When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the Cultural Heritage Commission and the staff of the Office of Historic Resources often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a "master" architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained "integrity"? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?<sup>15</sup>

With regard to integrity, the seven aspects of integrity of the National Register and California Register are the same and the threshold of integrity for individual eligibility is similar. However, the threshold of

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<sup>15</sup> *What Makes a Resource Historically Significant? City of LA Office of Historic Preservation, <http://preservation.lacity.org/commission/what-makes-resource-historically-significant>, accessed July 7, 2013.*

integrity for HPOZs is lower; a contributing structure in an HPOZ is a building that was constructed during the predominant period of development in the neighborhood and that has retained most of its historic features.

### 3. ENVIRONMENTAL IMPACTS

#### a. Methodology

The analysis in this section of the Draft EIR is summarized from the Assessment Report in Appendix C-3 which was conducted by Historic Resources Group (HRG) personnel who meet and exceed the Secretary of the Interior's Professional Qualification Standards in history, architectural history and historic architecture. The key steps taken in completing the Assessment Report which serves as the basis for this section of the Draft EIR are listed below.

- A review of the existing properties within the Palladium Residences Project Site.
- A review of any previous evaluations of Project Site properties through historic survey or other official action.
- Analysis and evaluation of any potential historic resources within a two block radius of the Project Site.
- Review of the required consideration of historic resources under CEQA.
- The following documents related to the Project Site's development were consulted:
  - Historic permits for properties within the Project Site
  - Sanborn Fire Insurance maps
  - Historic photographs, aerial photos and local histories
  - California State Historic Resources Inventory for Los Angeles County
  - Department of Parks and Recreation Historic Resources Inventory Forms
  - Community Redevelopment Agency Historic Survey Matrix

#### b. Thresholds of Significance

The thresholds for determining the significance of environmental effects on historical resources are derived from the State *CEQA Guidelines* as defined in Section 15064.5 and the *LA CEQA Thresholds Guide*.

According to the State *CEQA Guidelines*, a project involves a "substantial adverse change" in the significance of the resource when one or more of the following occurs:

- Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- The significance of a historical resource is materially impaired when a project:

- A. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or
- B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State *CEQA Guidelines* when one or more of the following occurs:

- 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 (Standards); or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.<sup>16</sup>

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. The Standards were developed as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (see 36 Code of Federal Regulations (CFR) Section 67.7). Similarly, the Los Angeles Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to City Monuments (see Los Angeles Administrative Code Section 22.171.14.a.1). Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations. Similarly, CEQA recognizes the value of the 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 Standards (see State *CEQA Guidelines* Section 15331 and 15064.5(b)(3)).

Based on the above considerations, the factors listed in the *L.A. CEQA Thresholds Guide* have been reviewed and refined to address both the State and City guidelines. As such, the Project would have a significant impact on historic resources, if:

<sup>16</sup> *L.A. CEQA Thresholds Guide, Section D.3. Historical Resources, City of Los Angeles, 2006, p. D.3-1.*

**HIST-1** The Project would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource); or

**HIST-2** The Project would reduce the integrity or significance of important resources on the Project Site or in the vicinity.

### c. Project Characteristics

As described in Chapter 2.0, Project Description, of this Draft EIR, the Project would protect and enhance the historic Palladium and would also add two new structures to the Project Site on the surface parking lots behind the Palladium building. The appearance of the Project would be the same for both Option 1, Residential and Option 2, Residential/Hotel. Both Options would maintain the existing Palladium building with similar building enhancements. New buildings for both Options would be constructed with the same structural configurations, including the same massing of above-ground and below-ground structures. Variations between the two would be accommodated through changes in the internal layout of space within the proposed new buildings. Further, all architectural treatments, open space amenities and landscaping would be the same under both Options.

Section 2.0, Project Description, of this Draft EIR provides a detailed discussion of the Project's characteristics. It also includes photographs of the existing Project Site conditions and it includes graphic exhibits that show the Project's Site design, with Site Plans and illustrative renderings of the Project's appearance from a variety of view points and elevations. Further, Section 4.A, Aesthetics/Visual Resources, includes a series of photo-simulation views of the Project Site that show the Palladium and proposed new Project buildings from a variety of vantage points.

In summary, the key project characteristics that are most pertinent to the Project's impacts on Historic Resources are the following:

#### (1) Palladium Operations and Enhancements

- The Palladium would continue to operate as an event and entertainment venue, maintaining the existing facilities intact. No changes are proposed to the building's defining exterior architectural features (e.g., signage/marquees, etc. would be retained). The existing, currently vacant 10,000 square feet of ancillary retail space within the Palladium building would be retained and new tenants are proposed to lease and use the space
- The Project Applicant has proposed, as a voluntary condition of approval, to nominate the Palladium as a Historic-Cultural Monument under the City of Los Angeles Cultural Heritage Ordinance in connection with issuance of building permits for the new development. This would preserve and protect the Palladium in the future.
- An enhancement program would be developed in conjunction with the Palladium's operator to improve the Palladium as an entertainment venue, support its continued operations, and retain the character-defining features of the building that contribute to its distinctive appearance and place in the Hollywood community. The enhancement program would include interpretive displays to increase general public and patron awareness and appreciation of the history and significance of Hollywood, the Palladium, and the performers who have appeared at the Palladium over the past

seven decades. Additional enhancements to the Palladium could include rehabilitation of the ballroom ceiling and ballroom floor and main lobby improvements that would be more compatible with the Palladium's historic features. The enhancement program would comply with the Secretary of the Interior's Standards for Rehabilitation. A qualified historic preservation consultant would monitor the work for conformance with the approved project scope of work.

## **(2) New Project Buildings**

- New Project buildings would include two buildings up to 28 stories and approximately 350 feet in height that would serve as a backdrop to the Palladium. The height of the building at the corner of Sunset Boulevard and Argyle Avenue, would be substantially stepped down in height and would be slightly lower in height than the Palladium. It would also be setback approximately 50 feet (compared to the Palladium's setback of approximately 20 feet) from Sunset Boulevard.
- The two new buildings would be sited to visually frame the Palladium building and north-south views toward the Hollywood Hills from Sunset Boulevard. Sufficient separation would be provided between the new buildings to allow views through the Project Site from residential neighborhoods in the Hollywood Hills. At street level, the three courtyards and pedestrian walkways would provide a substantial visual buffer between the Palladium and the new buildings, particularly along the Palladium's western façade.
- The new buildings would be clad with an articulated lattice façade with expanses of windows featuring low-reflectivity glass to complement the Streamline Moderne style of the Palladium building and marquees.
- New development at the northeast corner of the Project Site would include ground level, pedestrian oriented retail uses, with a parking structure above. The parking structure would reflect the overall architectural appearance of the Project and would have stepped back heights from Selma Avenue, reducing the building massing along Selma Avenue. There would be a large landscaped ground-level setback along Selma Avenue.

## **(3) Lighting and Signage**

- The existing Palladium signs and marquees would be retained as iconic landmarks and major features of the Project. The Palladium would remain the Project's most prominent night lighting and its marquee, blade sign, and neon lighting would not be obscured or subordinated.
- New Site signage would be limited to such functions as building identification, wayfinding, and security markings. The signage would be intended to serve the on-site Project activities, consistent with the provisions of the Hollywood Signage Supplemental Use District. No off-site signage is proposed.

## **(4) Landscape Plan**

- A landscape plan that would complement the aesthetic character of the Project Site and enhance its relationship to surrounding buildings would be implemented as part of the Project. The landscaping would reference historic Southern California's agricultural landscape while following best practices with drought-tolerant plants such as Mexican fan palms, citrus groves, and Southern California native plants. Spaces would be organized into grids of varied scales, and courts and streetscapes adjacent to retail locations would be designed for sitting.

- Of particular note, Argyle Court, the main entrance to the Project Site, would be open allowing continued views of the Palladium's western entrance from the western side of the Project Site. It would feature a central reflecting pool and planted courtyard on either side of the semi-circular, covered entryway.

#### d. Project Impacts

As described above, the appearance of the Project would be the same for both Option 1, Residential and Option 2, Residential/Hotel. Both Options would maintain the existing Palladium building with similar building enhancements. New buildings for both Options would be constructed with the same structural configurations, including the same massing of above-ground and below-ground structures; all architectural treatments, open space amenities and landscaping would be the same under both Options. Therefore, the following analysis of Project impacts on historical resources address impacts under both Option 1 and Option 2.

**Threshold HIST-1:** The Project would result in a significant impact on historical resources if it would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource).

**Impact Statement HIST-1:** *Project impacts on historical resources would be less than significant. The Project would not demolish, destroy, relocate, or alter the Hollywood Palladium such that it would be rendered ineligible for the National Register, California Register, or as a City Monument.*

The Project does not propose or anticipate demolition, destruction, or alteration of the Historic Palladium building or any of the identified historic resources located in the surrounding area. The building would be subject to vibration impacts during the construction of the new buildings on the Project Site. The construction of the new buildings would include excavation and grading and the use of vibratory equipment. The potential effects of construction activity on the Palladium building have been addressed throughout this Draft EIR. Most notably, Section 4.D, Geology addresses potential excavation impacts on nearby buildings based on a Soils and Geology Report prepared for the Project, and includes a mitigation measure that requires among other directives, a final geotechnical report based on final construction plans for the Project, with recommendations for retaining walls/shoring and excavation to meet applicable State and City regulatory requirements. A qualified geotechnical engineer would be retained by the Applicant to be present on the Project Site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the final geotechnical report. Section 4.I, Noise and Vibration, includes an analysis of the potential impacts of construction vibration on the Palladium building. As indicated in that analysis, impacts would be less than significant. With standard mitigation to protect the structural integrity of the Palladium, construction impacts on the integrity of the Palladium would be avoided.

The Project would continue operations of the Palladium as an event venue and would implement an enhancement program for the Palladium that would conform to the Standards, and therefore ensure that the Palladium retains its current level of eligibility as an historical resource at the national, state and local levels. Further, the Project Applicant has proposed, as a Project condition, nomination of the Palladium as a Historic-Cultural Monument under the City of Los Angeles Cultural Heritage Ordinance in connection with

issuance of building permits for the new development. This would preserve and protect the Palladium in the future.

The building's existing character-defining interior and exterior architectural features, as detailed in Section 5.1 of the Assessment Report in Appendix C-3, would be retained. As part of the Project, an enhancement program is proposed to be developed with the Palladium's current operator to enhance the Palladium as an entertainment venue, support its continued operations, and enhance the character-defining features of the building that contribute to its distinctive appearance and place in the Hollywood community. Key improvements could include additional rehabilitation of the historic main lobby to match or enhance the character of the original building design, and replacement of main entry doors under the marquee. Other general enhancements could include improvements to the ballroom, with repair of ceiling plaster, refinishing of the wood flooring and cleaning of the chandeliers; and rehabilitation/upgrading of the toilets. The proposed work would provide repairs to facilities and would provide improvements that would be more compatible with historic features of the building. The proposed work on the Palladium would meet the Secretary of the Interior's Standards for Rehabilitation. The Project will be reviewed and considered by the Office of Historic Resources and the Cultural Heritage Commission as part of the project's entitlement approval process, and those bodies will have input on the Project prior to approval. In addition, as part of the building permit review process, proposed work would be reviewed for permit clearances by the Office of Historic Resources of the City of Los Angeles Planning Department. A detailed discussion of the Project's conformance to the Standards is provided in Section 6.3 of the Assessment Report. As indicated there, the Project would conform to all of the Standards.

A small 2008 addition constructed of concrete masonry unit walls at the center portion of the North (rear) façade, attached to the back-of-stage facilities may or may not be removed in whole or in part by the proposed Project. This is a non-significant, non-character-defining, reversible addition. If removed in whole or in part, there would be no material or visual negative impact on the integrity and character of the Palladium building, the property as a whole, or the setting of the property.

**Threshold HIST-2:** The Project would result in a significant impact on historical resources if it would reduce the integrity or significance of important resources on the Project Site or in the vicinity.

**Impact Statement HIST-2:** *Direct and indirect impacts of the Project on historic resources would be less than significant. The Project would not reduce the integrity or significance of important historical resources on the Project Site or in the Project vicinity.*

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

The Project does not propose or anticipate new additions or exterior alterations to any historic material or contributing feature either on the Project Site or in the vicinity of the Project Site. The Project does involve related new construction. However, the proposed new construction would not destroy historic materials that characterize any historic resource either on the Project Site or in the vicinity of the Project Site. Therefore, the Project would not have any direct impact on an historical resource on the Project Site or in the Project vicinity.



## (2) Indirect Impacts

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity and significance of historical resources within the Project vicinity.

Although the Project would not alter any character-defining architectural features of the Palladium, the Project would alter the immediate surroundings of the Palladium by adding height and density to areas to the north and west, currently used for vehicle circulation and surface parking. The Project would also alter the Argyle Avenue access to the Palladium's western entrance. To avoid adverse impacts to the historic significance of the Palladium building, the Project design maintains the Palladium as the physical and visual focus of the site. The Project does this by confining new construction to the northern and western portions of the Project Site and by maintaining a clear spatial separation between the new construction and the Palladium building. Furthermore, the proposed new buildings are sited to maintain the views and prominence of the Palladium building from Sunset Boulevard, and as viewed from the corner of Sunset Boulevard and Argyle Avenue.

New construction located at the southwest corner of the Project Site is proposed to be lower in height than the Palladium building and set back substantially from the Sunset Boulevard building line. This design would maintain the Palladium building as the visual focus on Sunset Boulevard. This corner building is planned to be approximately 33.5 feet in height, with the top of the parapet wall approximately 42 feet in height. In comparison, the top of the Palladium's bowstring roof is approximately 48.5 feet while the top of the blade sign is approximately 52.5 feet. Additionally, this low-rise building would be set back from Sunset Boulevard by approximately 50 feet. This would further enhance the Palladium's Sunset Boulevard prominence above what it is today by framing the building, and preserving important view corridors of the Palladium's primary South façade. Historically, the material and visual character of the Palladium on Sunset Boulevard included commercial leaseholds along the entire frontage of the building, flanking the central marquee and covered, open foyer. Therefore, the dominant visual character, other than the central marquee and blade sign, was non-uniform commercial (food service and retail) storefronts and signage, built out to suit individual tenants. The re-tenanting of these spaces for new users, and the addition of new commercial leaseholds on Sunset Boulevard, set back in subordination to the Palladium's storefronts, is compatible with the historic development patterns and character of the site and the site's context on Sunset Boulevard.

The Palladium would be separated from the low-rise corner building by approximately 35 feet of grade level open space. This open space protects views looking north and east from Sunset Boulevard, and spatially separates the new construction so that the Palladium and its existing visual prominence along Sunset Boulevard would be maintained. Furthermore, the exterior walls of this low-rise building would be fully glazed to attain a transparency that enhances views of the Palladium from Sunset Boulevard.

The view from the southwest corner of the Project Site at Argyle Avenue and Sunset Boulevard to the west canopy of the Palladium would nevertheless be partially obstructed by the new low-rise building. This view, however, is not historically associated with the Palladium. During the period of significance for the Palladium, 1940-1960, the southwest corner (currently surface parking) was occupied by a service station that obscured sightlines from the southwest. The concrete screen wall at the south end of the Argyle Avenue entrance canopy deliberately blocked any view of the service station from the Palladium's west-facing facade. Therefore, from the southwest vantage, the proposed new building under the Project restores, rather than alters, the visual relations of the historic building to its setting.

The Project's two towers would be 28 stories and approximately 350 feet in height. As such, they would be taller than the Palladium building, which is approximately 48½ feet in height at the apex of its vaulted roof. To avoid adverse impacts to the Palladium building, the tallest portions of the Project would be set back from the Palladium and located on the northern portion of the Project Site so that they are subordinate to the presence of the historic Palladium building on Sunset Boulevard and Argyle Avenue. At grade level, there would be approximately 50 feet of separation between the Palladium's historic concrete screen wall located on the west façade and the new building to the north. This distance narrows to approximately 26 feet of separation at the second level. The spatial separation provides an appropriate "buffer zone" between the new construction and the Palladium so that the historic automobile entry and approach from Argyle Avenue can continue to be experienced and understood.

After Project implementation, access to the Palladium would continue to include the pedestrian entrance on Sunset Boulevard, the driveway and passenger drop-off entrance on Argyle Avenue, and a loading dock accessible from El Centro Avenue. The existing paved asphalt driveway entrance and surface parking with passenger drop off would be replaced with a new reconfigured circular driveway with landscaping, located under a raised portion of the new west tower. The new automobile circulation pattern would be similar to the existing pattern.

At night, illumination of the Project components would be confined to ground-level lighting needed to provide safe pedestrian and automobile circulation and illumination of the Project's interior spaces. External lighting of the Project buildings would be designed so that the Palladium would remain the most prominent aspect of the site at night and its iconic marquee, blade sign and neon lighting would not be subordinated by other lighting on the property.

By confining new construction to the north and west of the Project site, placing the tallest elements of the site substantially north of Sunset Boulevard and maintaining a clear spatial separation between the new construction and the Palladium building, the Project would retain important site lines to the Palladium and maintain the Palladium's important prominence on Sunset Boulevard. Based on this analysis, the Project would not alter the surroundings of the Palladium in such a manner that would materially impair its historic significance and, therefore would not have a significant impact on the historic resource.

The proposed new development would be differentiated from the existing development and would be compatible with the historic materials and features of the Hollywood Palladium. The curvilinear profiles of the new buildings are intended to echo and complement the Streamline Moderne style of the Palladium building and marquees. The new buildings would be clad with an articulated rectilinear lattice façade that echoes the gridded apron surrounding the Palladium blade sign and also reflects the street grid of Hollywood. The geometry of the curved canopy on the Argyle Avenue entry of the Palladium would be expanded into a formal port-cochere with a roadway and turning circle which would organize drop off and pick up of vehicles.

The scale of the Project is readily compatible with the Hollywood urban context, which already has a similarly sized and scaled office building across the street to the west at the northwest corner of Sunset Boulevard and Argyle Avenue. Equally important is the relative scale of the proposed new Project construction with the Palladium. The existing Palladium is a horizontal building with a very large footprint that occupies 71 percent of the frontage on Sunset Boulevard and 50 percent of the frontage on El Centro

Avenue. The new buildings would be slender vertical masses with relatively modest footprints. In terms of lot coverage, the Project site is equally shared between the Palladium and the new construction. The Project's two tall buildings would be considerably taller than the Palladium building. The disparity in heights is addressed by separating the new construction from the historic building with open spaces, and setting back both low rise and tall construction on the site such that the new construction is visually subordinated to the Palladium building. This careful siting of buildings and modulation of the overall massing would ensure that the Palladium remains the focal point of the site and important sight lines are preserved.

Critical to the discussion of scale is an understanding of how scale differences would be perceived and experienced from street level. The full height of the Project buildings in relationship to the Hollywood Palladium is not readily discerned from the street level when the Palladium is viewed obliquely, or head on, from Sunset Boulevard, when the new construction is viewed from the Palladium building, and when the new construction is viewed from the open spaces that are created between the Palladium building and the new construction. Careful siting and massing would ensure that the scale of new construction is compatible with the Palladium. As analyzed in the Assessment Report, the Project would conform to all of the Standards. The Project would not alter spatial relationships that characterize the property, and the Project's size, scale and massing would be compatible with the on-site historic resource. Furthermore, the Project does not propose or anticipate new additions to any historic resources either on the Project Site or in the vicinity of the Project Site.

As discussed in Section 6.2 of the Assessment Report, the Project would have no impact on the historical resources in the Project vicinity.

The Project would have no impact on four historical resources with limited distant or direct views of the Project including:

- CBS Columbia Square, 6215 Sunset Boulevard, located on the block east of the Project would have direct views of the Project. The Project does not propose any new development directly west of the CBS Columbia Square complex, as this is the location of the existing Palladium. The Project's new development on the east side of the parcel would be located to the rear of the block, north and west of CBS Columbia Square across El Centro Avenue. Further, the Project would be effectively distanced from this historic resource by El Centro Avenue. Finally, the Project would not obscure the highly-articulated street-facing façades of CBS Columbia Square along Sunset Boulevard. For these reasons, the significance and integrity of the CBS Columbia Square complex would not be materially impaired by alterations to its surroundings caused by the Project.
- Earl Carroll Theatre, 6230 Sunset Boulevard, located directly south of the Project across Sunset Boulevard would have direct views of the Project. The new development on the southwest portion of the Project Site, which would be across Sunset Boulevard from the Earl Carroll Theatre, is low-rise and set back from Sunset Boulevard and would not affect existing views of the Earl Carroll Theatre. The development of the Project would not alter the surroundings of the Earl Carroll Theatre in a manner that would materially impair its significance as a historical resource.
- Morgan Camera Shop, 6260-62 Sunset Boulevard, located on Sunset Boulevard across the street and just southwest of the Project would have direct views of the Project. The location and distance of the new development would not affect existing views or the surroundings of the commercial building.

The significance of the Morgan Camera Shop would not be materially impaired by alterations to its surroundings caused by the Project.

- Hollywood Legion Stadium, 1628 El Centro Avenue, located northeast of the Project on El Centro Avenue across Selma Avenue would have a limited distant view of the Project. The location of the Hollywood Legion Stadium to the northeast of the Project Site on El Centro Avenue across Selma Avenue is somewhat isolated from the Project Site by existing buildings to its south, most notably a parking structure at the corner of Selma Avenue and El Centro Avenue. To the limited extent the Project would contribute to the setting of the Hollywood Legion Stadium, the Project would present a large landscaped, ground level setback along the Selma Avenue that would contribute positively to the aesthetic character of the area. The Project uses at that location include ground level retail and parking, uses like those already occurring in the vicinity. The parking structure would have step-backed heights with a large landscaped area atop the seventh floor, avoiding taller building heights along Selma Avenue. The Project would not alter the surroundings of the Hollywood Legion Stadium in a manner that would materially impair its significance as a historic resource.

The Project would have no impact on one historical resource with no view of the Project:

- Home Savings and Loan, 1500 Vine Street located at the northeast corner of Vine Street and Sunset Boulevard, one block to the west of the Project would have no views of the Project. The high-rise building at 6255 Sunset Boulevard effectively separates the new development from the Home Savings & Loan building; therefore the Project would not alter the surroundings of Home Savings & Loan in a manner that would materially impair its significance as a historic resource.

## e. Cumulative Impacts

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of related projects that are planned or under construction in the Project area. Of the 62 related project sites, ten may have historic resources located on the same site as the related project. They are as follows:

- Related Project 4: Millennium Hollywood Mixed Use, 1744 N. Vine Street. Location of Capitol Records Tower, 1750 Vine Street, built 1954, locally listed Historic-Cultural Monument #857, and determined eligible for individual listing in the National Register (P-19-167595, CHR Status Code 2S2, 8/01/97). Location of H. L. Gogerty Building, 6272-6284 Yucca Street and 1770 N. Vine Street, built 1930, individually eligible for listing in the California Register (2010 CRA survey, CHR Status Code 3CS).
- Related Project 16: Hotel & Restaurant Project, 6381 W. Hollywood Boulevard. Location of the Security Trust & Savings Bank, built in 1920, and listed in the National Register and the California Register as a contributor to a district (P-19-171016; CHR Status Code 1D, 4/4/85).
- Related Project 21: Hudson Building, 6523 W Hollywood Boulevard. Location of the Holly Cinema, built in 1920, and listed in the National Register and the California Register as a contributor to a District(P-19-167557; CHR Status Code 1D, 4/4/85)
- Related Project 37: Highland Center Mixed-Use Project, 1600 Highland Avenue. Location of a historic property built in 1919, which is individually eligible for local listing (P-19-168025, CHR Status Code 5S2).

- Related Project 38: Lanewood Condos, 7045 Lanewood Avenue. Location of a historic property built in 1925, which needs to be reevaluated (formerly deemed eligible for listing) (P-19-168059, CHR Status Code 7N).
- Related Project 44: Columbia Square Mixed-Use, 6121 Sunset Boulevard. Location of Columbia Square, CBS, KNXT, built in 1937, which is eligible for listing in the National Register (P-19-167953, CHR Status Code 3S).
- Related Project 51: Hotel, 6600 Sunset Boulevard. Location of a historic property built in 1928, which needs to be reevaluated (formerly deemed eligible for listing (P-19-168078, CHR Status Code 7N).
- Related Project 52: Gramercy Place Private School, 1717 Gramercy Place. Location of the Hollywood Christian Church, built 1922 (P-19-167087, CHR Status Code 3S).
- Related Project 60: 6250 Sunset. Location of a historic property built at 6230 Sunset Boulevard in 1938, Earl Carroll Theater, which appears eligible for local and state listing (P-19-168083, CHR Status Code 3S).
- Related Project 62: Modern commercial building, 1341 Vine Street, built 1962 (CHR Status Code 7R).

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

### **(1) Resources in the Local Vicinity**

Of the nine related projects with potential resources, two are located in the immediate vicinity of the proposed Project. Related Project 44, Columbia Square is located adjacent to the Project Site on the north side of Sunset Boulevard across El Centro Avenue. Related Project 60, 6250 Sunset, is located on the south side of Sunset Boulevard across the street from the Project Site. The Project and nearby related projects contain historic structures and contribute collectively to the historic character of development along Sunset Boulevard.

Both the Columbia Square Project and the proposed Project, located on the north side of Sunset Boulevard, have placed new development behind the historic Palladium and CBS/KNXT buildings. The two buildings would remain significant historical resources and would maintain their spatial relationships with one another and Sunset Boulevard. The Columbia Square Project, as recently modified and currently under construction would not have significant impacts on historic resources, including the CBS/KNXT building, the Palladium, the Selma La Baig Historic District located to its eastern side and historical resources on Sunset Boulevard and in the project vicinity.<sup>17</sup> The 6250 Sunset project also proposes to protect and retain the Earl Carroll Building. As indicated above, the proposed Project would not have significant impacts on off-site historic resources, inclusive of potential effects on the CBS/KNXT and Earl Carroll Theater.

<sup>17</sup> CEQA No.: ENV-2013-16-MND, Addendum to the Environmental Impact Report for the Columbia Square Project, ENV-2007-819-EIR, June 7, 2013

The remaining related projects are located at distances of approximately 1,400 feet to 5,500 feet from the Project Site, isolated by intervening development and located in a number of locations of varying character and context.

## **(2) Resources Located within a Historic District**

The Project is not located within or immediately adjacent to a historic district. Therefore, the Project would not have a potential to adversely affect the context or historical resources of a historic district. Related Project 44, the Columbia Square Mixed-Use project, is not located within a historic district but is located to the west of the Selma-La Baig Historic District and would have no significant impacts to the historic district. Related Project 60, the 6250 Sunset Project, is not located within or immediately adjacent to a historic district.

## **(3) Same Architectural Style or Property type**

The Palladium is historically significant for its association with the development of recreation and entertainment venues in Los Angeles, and as an outstanding example of Streamline Moderne architecture from 1940 designed by architect Gordon B. Kaufmann. The historic structure associated with the 6250 Sunset project, the Earl Carroll Theatre is also a Streamline Moderne-style entertainment venue designed by architect Gordon B. Kaufmann in 1938. Another major entertainment venue, Florentine Gardens, also opened in 1938 at 5955 Hollywood Boulevard as a dinner theater; however, no project is currently proposed for the Florentine Gardens site. The Columbia Broadcasting System (CBS) studio complex built in 1938 at Columbia Square is a functionalist International Style project designed by New York architect William Lescaze, that is significant in Modern architectural design and for its importance in the history of the television and radio broadcasting; however, it is a broadcasting studio and is not representative of an entertainment venue property type or theater. Hollywood is unique for its high concentration of historic resources that are significant in the history of the entertainment industry. Only in Hollywood would two major entertainment venues, the Palladium and the Earl Carroll Theatre, be designed by the same architect, and situated across the street from one another, with a major broadcasting studio in close proximity.

As noted above, neither the Project nor the two related projects propose to demolish or alter their respective historic buildings. All propose to maintain their character defining features. Therefore, the three related projects would not remove examples of those features that represent the work of the architect and the architectural style or property type.

## **(4) Summary**

The Project, together with related projects, would not cumulatively significantly affect historic resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same style or property type as those within the Project Site. The two related projects in the Project's immediate vicinity will preserve and retain their potentially historic structures as part of their respective developments, like the Project does. Because these three projects propose to retain the potentially historic structures, they also do not remove similar examples of architectural style or type. The Project and related projects are also not in a historic district.

Further, as indicated above, the Project would have a less than significant impact on historic resources. With respect to the Palladium's status as a representative entertainment venue property type, the Project would

retain and enhance the Palladium in accordance with the Standards. Therefore, even if there were cumulative impacts, due to other related projects' impacts independent of the Project, the Project would not contribute considerably to cumulative impacts regarding the loss of such historic resources.

#### **4. MITIGATION MEASURES**

A mitigation measure that would include shoring for the Palladium building during Project excavation is included in Section 4.D, Geology, of this Draft EIR to ensure that the construction of new buildings would not adversely affect the integrity of the Palladium building. Project operations would not have significant impacts on historic resources, and no further mitigation measures beyond that included in Section 4.D, Geology would be required.

#### **5. LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project impacts would be less than significant as would cumulative impacts. No mitigation measures are required.

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