

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts to historical and archaeological resources. The analysis of historical resources is based on the Historical Resources Technical Report—TVC 2050 Project (Historic Report) prepared by Historic Resources Group (HRG), and the analysis of archaeological resources is based on information within the Tribal Cultural Resources Report prepared by Dudek, both included in Appendix C.^{1,2}

2. Environmental Setting

a. Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural 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 listed below, the principal federal, state, and local laws and programs governing and influencing the preservation of cultural resources of national, State, regional, and local significance include:

- National Historic Preservation Act of 1966, as amended
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- Native American Graves Protection and Repatriation Act
- Archaeological Resources Protection Act
- Archaeological Data Preservation Act

¹ HRG, Historical Resources Technical Report—TVC 2050 Project, January 7, 2022.

² Dudek, Tribal Cultural Resources Report, August 2021.

- California Environmental Quality Act
- California Register of Historical Resources
- California Health and Safety Code
- California Public Resources Code
- City of Los Angeles General Plan
- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3)
- City of Los Angeles Historic Resources Survey

The primary regulations that influence the analysis of historical and archaeological resources are described below by government level.

(1) Federal

(a) National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment.”³ The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.⁴

³ 36 Code of Federal Regulations (CFR) 60.

⁴ U.S. Department of the Interior, National Park Service, National Historic Landmarks, Frequently Asked Questions.

A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historical resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”⁵

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district’s significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original City limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁶

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.

(i) Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a property must be significant in

⁵ U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 5.

⁶ U.S. Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties, 1997, p. 12.

American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a property:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody 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. Have yielded, or may be likely to yield, information important in prehistory or history.⁷

(ii) Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific... property or site is understood and its meaning... is made clear.”⁸ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(iii) Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance.”⁹ The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the

⁷ U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 8.

⁸ U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pp. 7–8.

⁹ U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 44.

National Register has a higher integrity threshold than State or local registers. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before its integrity is analyzed.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character-defining features.

(iv) Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for listing in the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.¹⁰ Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.¹¹ The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

¹⁰ U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 25.

¹¹ U.S. Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 41.

- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- G. A property achieving significance within the past 50 years if it is of exceptional importance.

As discussed below, properties listed and formally determined eligible for listing in the National Register are included in the California Register of Historical Resources (California Register) by statute.

(b) Secretary of the Interior's Standards for the Treatment of Historic Properties

The National Park Service issued the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards) with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Standards. The Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards) 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 historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will 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. Archaeological 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 will 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.¹²

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) Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to return Native American cultural items to the appropriate federally recognized Indian tribes or Native Hawaiian groups with which they are associated.¹³

¹² U.S. Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

¹³ U.S. Department of the Interior, National Park Service, Archaeology Program, Native American Graves Protection and Repatriation Act.

(d) Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archaeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.¹⁴

(e) Archaeological Data Preservation Act

The Archaeological Data Preservation Act (ADPA) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

(2) State

(a) California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts 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 by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

¹⁴ U.S. Department of the Interior, National Park Service, Technical Brief #20: Archaeological Damage Assessment: Legal Basis and Methods, 2007.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site shall be evaluated in accordance with the provisions of PRC Section 21083.2 that address potential impacts to unique archaeological resources. As defined in PRC Section 21083.2(g), a unique archaeological resource is 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 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.

If an archaeological site meets the criteria for a unique archaeological resource, then the site is to be treated in accordance with the provisions of PRC Section 21083.2(b), which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place. If preservation in place is not feasible, mitigation measures shall be required in accordance with PRC Sections 21083.2(c),(d), (e), and (f), as applicable. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.¹⁵

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “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.”¹⁶ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

¹⁵ State CEQA Statute and Guidelines, Section 15064.5(c)(4).

¹⁶ State CEQA Statute and Guidelines, Section 15064.5(b)(1).

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g), 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. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

In general, a project that complies with the Standards is considered to have impacts that are less than significant.¹⁷

(b) California Register of Historical Resources

The California Register is “an authoritative guide to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁸ The California Register was enacted in 1992 and became effective on January 1, 1993. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.¹⁹ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for listing in the California Register, a property must be significant 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

¹⁷ State CEQA Statute and Guidelines, Section 15064.5(b)(3).

¹⁸ California Public Resources Code, Section 5024.1(a).

¹⁹ California Public Resources Code, Section 5024.1(b).

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

A property eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a property may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register in certain limited circumstances.

Additionally, 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 in the National Register and those formally determined eligible for listing in the National Register;
- State Historical Landmarks from No. 770 onward; and
- Those California points of historical interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion in the California Register.

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

- Individual historical resources;
- Historical resources contributing to the significance of a historic district under criteria adopted by the State Historical Resources Commission;
- Historical resources identified as significant in historical resources surveys, if the survey meets the criteria listed in PRC Section 5024.1(g); Historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any local ordinance, if the criteria for designation or listing under the ordinance have been determined by the OHP to be consistent with the California Register criteria adopted by the State Historical Resources Commission; and
- Local landmarks or historic properties designated under any municipal or county ordinance.²⁰

²⁰ California Public Resources Code, Section 5024.1(e).

(c) California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

(d) California Public Resources Code

PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

(3) Local

(a) City of Los Angeles General Plan

(i) Conservation Element

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

related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.²¹

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM); and
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ).

(ii) Community Plan

The Project Site is located within the Wilshire Community Plan area, which includes the following goal and associated policies with respect to cultural resources:

Goal 17: Preserve and restore cultural resources, neighborhoods and landmarks which have historical and/or cultural significance.

Objective 17-1: Ensure that the Wilshire Community's historically significant resources are protected, preserved, and/or enhanced.

Policy 17-1.1: Encourage the preservation, maintenance, enhancement and reuse of existing historic buildings and the restoration of original façades.

Objective 17-3: Encourage private owners of historic resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.

(b) City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Cultural Heritage Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The Cultural Heritage Ordinance states that an HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature. A historical or cultural monument is any site, building, or structure of

²¹ City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.

particular historical or cultural significance to the City of Los Angeles. A proposed resource may be eligible for designation if it meets at least one of the following criteria:

- The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of with historic personages important to national, state, city, or local history; or
- The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.²²

Unlike the National Register and California Register, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, LAMC Section 91.106.4.5.1 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic-cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”²³

²² City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

²³ City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

(c) City of Los Angeles Historic Preservation Overlay Zone Ordinance

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (HPOZs) in 1979; most recently, this ordinance was amended in 2017. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.²⁴ Each HPOZ is established with a historic resources survey, a historic context statement, and a preservation plan. The historic resources survey identifies all contributing and non-contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ, as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing elements are defined as any building, structure, landscaping, or natural feature identified in the historic resources survey as contributing to the historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the alterations are determined reversible by the historic resources survey.²⁵ For CEQA purposes, contributing elements are treated as contributing features to a historic district, which is the historical resource. Non-contributing elements are any building, structure, landscaping, or natural feature identified in the historic resources survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, non-contributing elements are not treated as contributing features to a historical resource.

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

The City of Los Angeles Historic Resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially eligible historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's Office of Historic Resources (OHR). The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially eligible resources that 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, conducted

²⁴ City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

²⁵ City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

from 2010–2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement is organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for City, state, and federal designation programs. The HCS used Eligibility Standards to identify the character-defining features, associative features and integrity aspects a property should retain to be a significant example of a type within a defined theme. Eligibility Standards also indicate the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types, and properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or HCM eligibility criteria. 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 historical resources. Designation by the City of Los Angeles and nominations to the California Register or National Register are separate processes that include property owner notification and public hearings.

b. Existing Conditions

(1) Historical Resources

(a) Historical Background of the Project Site and Surrounding Area

The Historic Report included in Appendix C of this Draft EIR includes a detailed description of the historical background and context of the Project Site and surrounding area. Below is a summary of the discussion included in the Historic Report.

(i) Surrounding Area

The Project Site is located within the Wilshire Community Plan area and in the Beverly-Fairfax neighborhood in the City of Los Angeles. This neighborhood is generally

bounded by La Brea Avenue, Wilshire Boulevard, the eastern boundary of the City of Beverly Hills, the southern boundary of the City of West Hollywood, and Melrose Avenue. The area is generally flat throughout and is largely characterized by urban development with limited natural features. Among those elements that shape and define the Beverly-Fairfax neighborhood are a hierarchical street grid traversing well-developed residential neighborhoods; commercial corridors along Fairfax Avenue, Beverly Boulevard, and 3rd Street; The Original Farmers Market and The Grove shopping and entertainment center; Television City; Park La Brea Apartments; and Pan Pacific Park.

Much of the land that is now part of the Beverly-Fairfax neighborhood was originally part of the massive Rancho La Brea (Rancho). Most of the Salt Lake Oil Field underlies the neighborhood in the northwestern portion of the Wilshire Community Plan area, and for many years this area was covered with oil derricks. The La Brea Tar Pits are the most visible surface manifestation of this vast underground resource. The Hancock family embarked on the first oil exploration in this area, and in 1900 rancher A.F. Gilmore began doing the same on the portion of the Rancho he had acquired.

A.F. Gilmore owned a relatively small percentage of the Rancho land, but he developed it thoroughly; like G. Allan Hancock in Hancock Park, by the 1910s A.F. Gilmore saw the value of subdividing and selling off the less productive portions of his land. It soon became clear to Gilmore and his son E.B. Gilmore that housing and commercial development brought in more money than oil production. Between the Hancocks and the A.F. Gilmore Company, by the early 1930s most of the land in the Beverly-Fairfax neighborhood north of Wilshire Boulevard had been subdivided and developed.

In 1934, The Original Farmers Market, operated by Fred Beck and Roger Dahlhjelm at 3rd Street and Fairfax Avenue (on land owned by E.B. Gilmore) opened, inviting local farmers to sell their produce out of the backs of their trucks. Soon, The Original Farmers Market became a permanent venue; restaurants, ice cream stands, flower shops, and other retail stores began selling at the market. The Original Farmers Market still exists in its original location (although it has grown), with an array of food stands and retail shops. The Original Farmers Market is the last remnant of Gilmore's commercial and recreational developments, which once included a drive-in movie theater, a racetrack, and a stadium.

Like the single-family and multi-family developments in the Mid-Wilshire and Hancock Park neighborhoods, the new neighborhoods of the Beverly-Fairfax area were developed and heavily marketed as discrete subdivisions. They included a high number of multi-family residences, including numerous two-story duplexes and fourplexes, in a variety of Period Revival styles. Most were constructed from the mid-1920s to the early 1930s, though later examples exist. A prominent, unusually intact, and somewhat late example of an apartment house district is Beverly Square, constructed in the 1930s and 1940s as an "ultra-modern" residential development. The Beverly-Fairfax developments were even

more automobile-focused than the automobile suburbs further east in the Wilshire Community Plan area since they were located outside the outer limit of the Los Angeles Railway's streetcar system.

While much of west-central Los Angeles did not have a large Jewish American population until after World War II, the Beverly-Fairfax neighborhood had a significant Jewish American presence from its earliest development in the 1920s. For example, research on the residents of the Orange Grove Avenue and Gardner Street area, historically a Jewish enclave, found a diverse Jewish community representative of the overall Beverly-Fairfax area at that time. This neighborhood, part of a subdivision developed by G. Allan Hancock, included recent immigrants from outside the United States, people who had moved from the east coast, and Angelenos who had moved to the area from other parts of the City (primarily Boyle Heights). It may be that this neighborhood and other known early Jewish residential enclaves in the Beverly-Fairfax area did not exclude Jewish homeowners and renters based on restrictive housing covenants or realtor influence as seen in other parts of Los Angeles. Permit and census research indicates that a substantial number of properties in these enclaves were built and owned by Jewish individuals, both living on-site and renting to tenants. During the postwar period, the Jewish population in the Beverly-Fairfax neighborhood increased substantially and continued to move westward into neighborhoods like Pico-Robertson. The Beverly-Fairfax neighborhood is still a popular residential area for Jewish families, including members of the Orthodox community who established residences in the Wilshire Community Plan area starting in the 1980s.

Residential subdivisions in the Beverly-Fairfax neighborhood were serviced by commercial districts including those along 3rd Street, Beverly Boulevard, and Fairfax Avenue. A particularly prominent Jewish business district emerged along Fairfax Avenue. Businesses catering to the area's Jewish population began appearing on Fairfax Avenue starting in the 1930s, accelerating greatly after World War II. In the postwar years, there were numerous community centers, neighborhood synagogues, kosher delis, restaurants, and Jewish bakeries in the neighborhood. Several of these businesses, including Canter's Delicatessen, Schwartz Bakery, and Diamond Bakery, are still in operation. Beverly Boulevard also saw a significant increase in the establishment of Jewish commercial and institutional properties during the postwar period, many of which continue to serve the community today.

(ii) Project Site

Television City was originally developed in 1952 in accordance with a master plan, conceptualized as 2.5 million square feet of total development designed by the local architectural team of William Pereira and Charles Luckman (Pereira & Luckman). In a

supporting role, Gin Wong, who would go on to become an important architect in his own right, was the project coordinator for Television City.²⁶

The original Primary Studio Complex, located generally in the center of the Project Site, is made up of two attached buildings designed in the International Style—the Service Building on the east and the Studio Building on the west. The Primary Studio Complex is designated as HCM No. 1167 and is outlined in Figure IV.B-1 on page IV.B-20. The HCM designation does not include any additions or modifications made to the Primary Studio Complex after 1963, as the period of significance for the HCM is 1952–1963. The 1969 eastern expansion of the Service Building and the attached Support Building, which was constructed on the west side of the Studio Building in 1976, were added to the Primary Studio Complex after 1963 and are not part of the HCM.

Beyond the Primary Studio Complex, numerous modifications and additions have been made to the Project Site to accommodate the evolving nature of studio operations. Numerous production buildings, basecamps, trailers, and bungalows were constructed to accommodate production needs. In 1993, the East Studio Building was constructed, which contains two additional studios. Further, more recent improvements on the Project Site include photovoltaic canopies within the surface parking lots along Beverly Boulevard and Fairfax Avenue and perimeter security fencing with visual screening to meet safety and privacy needs.

(b) Architectural Description of Project Site Buildings

This section provides architectural descriptions of the Primary Studio Complex, the Support Building, the East Studio Building, and the Project Site's ancillary buildings. The buildings that are not included in the HCM designation are not described in the same level of detail as the Primary Studio Complex. Refer to the Historic Report for additional details, including a description of the interiors of the existing buildings.

(i) Primary Studio Complex

As constructed in 1952, the Primary Studio Complex included only the Studio Building on the west and the Service Building on the east. The attached Support Building, which was constructed on the west side of the Studio Building in 1976, and the three-story,

²⁶ A native of Guangzhou, China, Wong studied architecture under Pereira at the USC School of Architecture, where he graduated in 1950. Immediately joining Pereira and Luckman, and later continuing with Pereira when he split from Luckman, Wong became an indispensable designer and project manager on Pereira's largest and most high-profile projects. Founding his own firm, Gin Wong Associates, in 1973, Wong built locally and internationally, including expansions of LAX and the ARCO Center in Los Angeles.

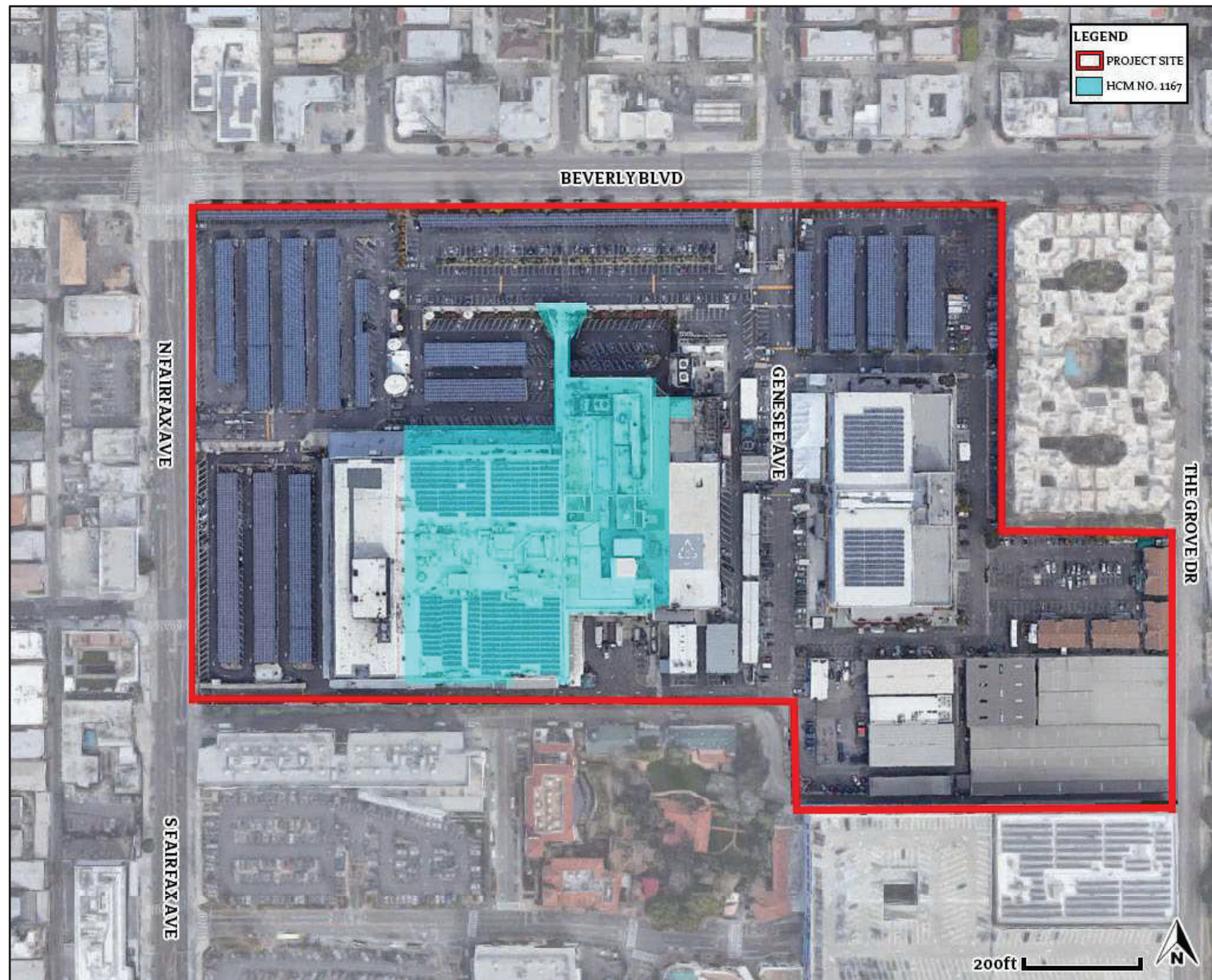


Figure IV.B-1
Primary Studio Complex

detached East Studio Building constructed in 1993, are not a part of the original Primary Studio Complex and are not included as part of the HCM designation.

Designed in the International Style, the Primary Studio Complex consists of simple, rectangular building forms massed asymmetrically, creating an irregular plan. The Primary Studio Complex is set back from Beverly Boulevard, with surface parking to its north and west, and its primary (north) façades face Beverly Boulevard. The Primary Studio Complex is constructed of steel framing and reinforced concrete. Wall cladding includes tilt-up concrete panels, smooth stucco, corrugated steel decking, and steel gridded glazing. Refer to Appendix A of the Historic Report for a Photo Index Map and corresponding photographs of the Project Site.

The Primary Studio Complex's exterior cladding is painted either black or white, with red accents at the entry bridge and concourse railings.²⁷ Wall-mounted signage includes large lettering reading "CBS" [with eye logo] at multiple façades, along with smaller signs to direct pedestrian and truck traffic. The roof of the Primary Studio Complex is flat, with rolled asphalt roofing material.

The Service Building (the easternmost building of the Primary Studio Complex) is rectangular in plan and projects farther north than the adjoining Studio Building. Its north half is dominated by a three-story office building with gridded glass curtain walls at the primary (north) façade and a portion of the east façade. This volume's third story is U-shaped and rises above the two-story height of the building's south half. A corrugated steel screen hides mechanical equipment from view. The primary façade's first story is a shallow glazed volume with a corrugated steel-clad planter and a projecting shed roof, which partially delineates the primary entry lobby on the interior. South of the office portion of the Service Building, the roof supports numerous ad-hoc rooftop additions, which were constructed after the period of significance and prior to the Project and are not considered historic or part of the HCM designation. East of the Service Building are one- and two-story additions constructed in 1969 (collectively referred to as the "Mill Addition"). The original east wall of the Service Building was removed to accommodate the Mill Addition.

The rectangular, two-story Studio Building (the westernmost building of the Primary Studio Complex) is an essentially windowless box, save for some windows at the ground story; its only prominent opening is a set of large metal sliding doors at its south (rear) façade.

²⁷ Originally, black indicated something "temporary and removable," and white indicated something "fixed;" Refer to the Historic Report in Appendix C, p. 28.

The Primary Studio Complex has a recessed ground story fronted by a regular grid of concrete columns or pilotis. The columns are present at the primary (north) façade of the Service Building, and the ground story of the Service Building is enclosed with glazing. The ground story of the Studio Building is shaded by a wide, projecting, concrete concourse encircling the perimeter of the first story. The concourse has low corrugated steel walls topped by metal pipe handrails with angled fin stanchions. Steel stairways with metal pipe handrails provide access to the ground-level concourse below. The configuration of the concourses supported by ground story columns gives the Primary Studio Complex a “floating” appearance, enhanced by the north/south-sloping grade that situates the ground story at a lower grade.

The Primary Studio Complex is primarily accessed by a distinctive bridge that spans the sunken plaza, terminating on the concourse at a point between the Studio Building and Service Building. This concrete bridge is supported by tall, angled, steel pipe “X” supports, which extend through the center of the bridge to a flat canopy of corrugated steel decking with a T-shaped plan. The north end of the canopy bears signage reading “TELEVISION CITY.” The bridge has low walls of corrugated steel topped by metal pipe handrails with angled fin stanchions. The north end of the bridge has low corrugated steel planters. Landscaped areas and a small water feature sit below the bridge’s south end where it meets the Primary Studio Complex.

At the rear (south) elevation of the Service Building, the paved grade slopes back up to the north, eliminating the exterior ground story seen to the west and north and providing vehicular access to a concrete loading dock with a flat roof. Northeast of the Service Building is a metal-fenced area containing an engine generator building constructed in 1987.

(ii) Support Building

The Support Building (a 1976 addition to the west of the Primary Studio Complex) is three stories in height with a smaller fourth story mechanical room. Construction of the Support Building in 1976 partially demolished and otherwise covered up the original exterior west wall of the Studio Building. Its two main stories feature a few fixed windows (which are modern additions), while its third “penthouse” story is slightly set back to create a perimeter roof deck with a tall parapet wall. This volume has floor-to-ceiling windows and fully glazed metal doors and is shaded by a projecting cantilevered metal canopy. Contiguous with that of the Studio Building, the ground story of the Support Building is shaded by a wide, projecting, concrete concourse encircling the perimeter of the first story.

(iii) East Studio Building

The East Studio Building, constructed in 1993, is a three-story building with a rectangular footprint. It has rectangular, box-like massing and is clad in concrete panels similar to those at the Primary Studio Complex. The building does not exhibit strong characteristics of any specific architectural style, although the east elevation has a glass curtain wall and a horizontal band of fixed metal windows that reflect a modern adaptation of certain International Style elements. The building's primary (north) façade is a windowless plane fronted by a projecting canopy with squared concrete columns, corrugated metal cladding, and concrete planters. The canopy creates a simple colonnade sheltering the primary entry, a set of double metal doors. A large set of double metal loading doors is also located at the primary façade. With the exception of the east elevation, the East Studio Building elevations are devoid of ornamentation or fenestration.

(iv) Ancillary Buildings

The Project Site contains approximately 30 ancillary buildings and structures, in addition to other structures including equipment pads, carports with solar panels, and satellite dishes. The largest ancillary buildings are storage warehouses clustered in the southeast portion of the Project Site. These storage warehouses are one-story rectangular buildings with low pitched gabled roofs and corrugated metal wall cladding.

Temporary one-story studio bungalows are located adjacent to the east and south sides of the Primary Studio Complex. Several of the bungalows are attached to each other, creating long, rectangular footprints. Temporary bungalows of a different type are found in a four-building cluster in the southeast portion of the Project Site. The temporary bungalows are one-story modular buildings which were repurposed as production offices.

(c) Previous Evaluations and Historic Designations

As discussed in detail in the Historic Report, in 2015, Television City was identified as eligible for listing as a historical resource through a survey evaluation by SurveyLA, and it was subject to a comprehensive historic assessment conducted by Architectural Resources Group (ARG), which is documented in the Historic Resource Assessment dated April 11, 2018 (2018 Historic Resource Assessment). The Primary Studio Complex was formally designated as HCM No. 1167 on June 26, 2018 (CHC-2018-476-HCM). According to the HCM adoption resolution, the HCM is limited to: (1) the original 1952 Service Building; (2) the original 1952 Studio Building; (3) the enclosure of the Service Building's north façade in 1959; and (4) the addition of a small compressor room to that building's east façade. The HCM adoption resolution also included additional findings made by the Cultural Heritage Commission. The 2018 Historic Resource Assessment found the Primary Studio Complex to be individually eligible for listing in the National Register under Criteria A and C, the California Register under Criteria 1 and 3, and as an

HCM under Criteria 1 and 3. Because the Primary Studio Complex has been assessed as eligible for listing in the National Register and California Register, and has been designated as HCM No. 1167, the Primary Studio Complex meets the definition of a historical resource. The other existing buildings on the Project Site are not potential historical resources because, as discussed in the 2018 Historic Resource Assessment, the post-1963 buildings are not historically or architecturally significant and do not contribute to the significance of the Primary Studio Complex, and such buildings were not included in the HCM designation. The evaluation of significance and integrity from the 2018 Historic Resource Assessment, which is attached as Appendix D of the Historic Report, is summarized below.

(i) Evaluation of Significance

The period of significance for Television City has been defined as 1952-1963, beginning with the year the original Primary Studio Complex was constructed and ending with the year that CBS abandoned its vision of a single unified production facility and moved its filmed programming operations to the CBS Studio Center lot in Studio City. These dates include architectural modifications made to the Primary Studio Complex during the period of significance, including the 1959 enclosure of the Service Building's north façade and the addition of a small compressor room to that building's east façade. The period of significance also represents the maturation of commercial television in the post-World War II period, including the "Golden Age" of live drama series. During this time, television use grew exponentially, and networks expanded their operations and facilities nationwide. This is evidenced in the development of Television City between 1952 and 1963. Finally, the period of significance represents the postwar evolution of CBS, as it grew into one of the country's three biggest television networks with the construction of Television City as the first large-scale, purpose-built television production facility in Los Angeles.

Extensive research did not indicate that any of Television City's post-1963 additions contribute to the historical significance of the Primary Studio Complex. These post-1963 additions include, among others, the 1969 eastern expansion of the Service Building; the 1976 addition of the Support Building west of the Studio Building; the 1993 East Studio Building; the addition of numerous ancillary buildings and structures; and the Project Site's overall hardscape/landscape as it exists today. The 1969 and 1976 additions are architecturally compatible with the Primary Studio Complex, but do not reflect functional adherence to Pereira & Luckman's original master plan for the Project Site. Constructed in 1993 and located on two separate parcels east of the Primary Studio Complex (rather than contiguous with the existing buildings, per the Pereira & Luckman master plan), the East Studio Building is not clearly associated with the historical pattern of development of Television City, and sufficient time has not passed in order to have a scholarly perspective on its potential historical significance. As a result, the East Studio Building does not appear

to be significant within the context of the subject property as a whole. The same conclusion was reached for the other existing ancillary buildings and structures that were constructed after 1963, as well as the current landscape and hardscape.

(ii) Integrity

As it exists today, the Primary Studio Complex retains most aspects of its integrity, including integrity of location, design, materials, workmanship, feeling, and association. Its integrity of setting has been lost due to numerous changes to the Project Site that have occurred since the original period of development. In addition, the interiors have experienced significant modifications over time. However, the Primary Studio Complex itself is still able to convey its overall historic character, appearance, and association with television and the historical period when it became the first large-scale purpose-built television facility. As a result, the Primary Studio Complex retains sufficient integrity to convey its significance.

(iii) Character-Defining Features

Character-defining features refer to all those visual aspects and physical features that comprise the appearance of a historical resource. Character-defining features are the tangible elements that contribute to a building's sense of time and place. Character-defining features can be generally grouped into three categories: the overall visual character of a building, the exterior materials and craftsmanship, and the interior spaces, features, and finishes. The relative importance of character-defining features depends on the level of quality, visibility, and integrity. In addition, some character-defining features are more important than others in conveying the significance of a building.²⁸

The character-defining features identified below are set forth in the findings that were adopted as part of the HCM designation, included as Appendix C of the Historic Report. These features are considered to be the most important elements contributing to the significance of the Primary Studio Complex, and generally include the exterior features that date from the period of significance, directly relate to the original use and architectural style, are constructed or fabricated from historic materials, are highly visible, and retain integrity.

- Site Location:
 - Location at the corner of Beverly Boulevard and Fairfax Avenue, with the Primary Studio Complex set back and facing Beverly Boulevard

²⁸ National Park Service, Preservation Brief 17: Architectural Character—Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character.

- Primary Studio Complex:
 - Overall form, massing, and configuration of the Primary Studio Complex, with north/south-sloping grade from the north end of the entry bridge to the primary complex façade
 - “Floating” appearance, with columns (pilotis) at open ground story
 - Exterior concourses with railings and angled fin stanchions at first story
 - Central concrete entry bridge with walls, planters, railing, canopy, and metal “X” supports
 - Glass curtain wall at north and east façades of Service Building
 - Projecting planters and shed roof canopy at exterior of entry lobby, north façade of Service Building
 - Cladding of concrete panels and corrugated steel decking material
 - Black and white color scheme with red accents
 - Prominent wall-mounted signage at the corners of the Service Building
 - CBS logo tiles in the main entry lobby and continuing along the south wall of the entrance hallway immediately east of the lobby
- Future Exterior Viewshed Features of the Primary Studio Complex as seen from Adjacent Public Areas along Beverly Boulevard
 - Central entryway bridge
 - Signage on the central entryway bridge
 - Signage at the western corner of the Service Building
 - View of the intersection between the western portion of the Service Building and Studio Building so that it is possible to “read” the structures as two asymmetrically connected volumes (see Exhibit 1a)²⁹
 - Glass curtain wall of the Service Building, including a sufficient expanse of the eastern corner of the Service Building to cause the Service Building glass curtain wall to read as a three-dimensional cube (see Exhibit 1b) (it being

²⁹ Exhibit 1a is included in the adopted HCM findings (CHC-2018-476-HCM), which is included in Appendix C of the Historic Report.

understood that the lower portions of the wall and façade may not be visible from public areas)³⁰

(d) Historical Resources—Project Site Vicinity

In addition to examining the Project Site itself, the Historic Report defines an area surrounding the Project Site where potential direct or indirect impacts could reasonably be expected to occur (Project Site Vicinity). The Historic Report defined the Project Site Vicinity as all parcels immediately adjacent to the Project Site, as well as all parcels located directly across the street from the Project Site. Streets bordering the Project Site include Beverly Boulevard to the north, Fairfax Avenue to the west, The Grove Drive to the east, and the southern property line to the south.

In addition to designated HCMs, properties identified as appearing eligible for national, state, or local landmark or historic district designation through SurveyLA were presumed by the Historic Report to be historical resources. Five such properties were identified in the Project Site Vicinity, including two resources that are collectively included in a single HCM designation. The other resources were previously identified as appearing eligible for historic listing by SurveyLA. In order to provide a conservative analysis of the Project's potential impacts, the Historic Report does not refute any recent survey findings regarding the eligibility of these properties. The properties were not researched or reevaluated on an intensive level to independently determine their eligibility as potential historical resources. The five properties are discussed below, shown in Figure IV.B-2 on page IV.B-28, and listed in Table IV.B-1 on page IV.B-29.

(i) The Original Farmers Market and Rancho La Brea Adobe (6333 West 3rd Street and 6301 West 3rd Street)

Located directly south of the Project Site, The Original Farmers Market property was originally a portion of the Rancho La Brea land grant. The property includes the Rancho La Brea Adobe (generally referred to as the Gilmore Adobe), which was originally constructed in 1852. It was substantially remodeled by Gilmore for use as a family home and continued to be used as a residence by subsequent generations of the Gilmore family until 1976. The one-story building with cross-gabled red tile roof is located south of the Project Site.

The property also contains a cluster of wood-frame buildings and vendor stalls at the northeast corner of Fairfax Avenue and 3rd Street, referred to today as The Original Farmers Market. The market was established in 1934 as an informal produce market

³⁰ Exhibit 1b is included in the adopted HCM findings (CHC-2018-476-HCM), which is included in Appendix C of the Historic Report.



Figure IV.B-2
Historical Resources in the Project Site Vicinity

**Table IV.B-1
Summary of Historical Resources in the Project Site Vicinity**

| Map No. | Name | Address/Location | APN | Historical Resource Status | Period of Significance |
|---|--------------------------------------|---|--|--|-------------------------------|
| 1 | The Original Farmers Market | 6333 W. 3rd St. | 5512-003-030 | Designated HCM No. 543 along with the Rancho La Brea Adobe (see below). | 1934–1949 |
| 2 | Rancho La Brea Adobe (Gilmore Adobe) | 6301 W. 3rd St. | 5512-003-043 | Designated as HCM No. 543 along with The Original Farmers Market (see above). | 1880 |
| 3 | Chase Bank | 312 N. Fairfax Ave. | 5527-037-030 | Identified as appearing eligible for listing in the California Register and for local listing as an HCM by SurveyLA. | 1966 |
| 4 | Fairfax Theater | 7901–7909 W. Beverly Blvd. | 5527-036-020 | Determined eligible for listing in the National Register by the Keeper; listed in the California Register. Identified as appearing eligible for listing in the California Register. Designated as HCM No. 1248 on December 7, 2021. ^a | 1930 |
| 5 | Air Raid Siren No. 25 | Located on the west side of Ogden Dr. between W. Beverly Blvd. and the alley north of Beverly Blvd. in the sidewalk in front of the commercial building at 8701–8703 W. Beverly Dr. The storefront street address is shown as 309 Ogden Blvd. | Non-Parcel Resource Located East of APN 5527-038-001 | Identified as appearing eligible for listing in the National Register, California Register and as an HCM by SurveyLA. | 1940 |
| <p>^a An HCM number has not been assigned.</p> <p>Source: Historic Resources Group, 2022.</p> | | | | | |

where local farmers could sell their wares. It proved to be immensely popular and soon evolved to include dining and retail establishments in addition to fresh produce. These uses continue to the present day. The stalls and market layout were designed to evoke typical California roadside produce stands. A Colonial Revival-style clock tower was constructed on the property in 1949, which became a signature identity element for The Original Farmers Market.

The Original Farmers Market and Rancho La Brea Adobe (Gilmore Adobe) were together designated as HCM No. 543 in 1991. Because both properties are collectively designated as an HCM, they are treated herein as historical resources.

(ii) Chase Bank (312 North Fairfax Avenue)

Located at the northeast corner of Fairfax Avenue and Beverly Boulevard, this one- and two-story commercial building was constructed in 1966 to house City National Bank and Equitable Savings and Loan. Currently occupied by Chase Bank, the building was designed by architect Dan Saxon Palmer in the New Formalist style. The building is irregular in plan with a steel frame and concrete construction. It consists of a rectangular single-story volume occupying the full width of the parcel and set back from Beverly Boulevard. An overlapping two-story volume is built to the property line on Beverly Boulevard and set back from Fairfax Avenue. At the intersection of the two volumes is a small open plaza at the corner of Beverly Boulevard and Fairfax Avenue.

Chase Bank is treated as a historical resource because it was identified by SurveyLA as appearing eligible for listing in the California Register and as an HCM. Chase Bank was found to be significant as an “excellent example of New Formalist bank architecture in the Wilshire area, designed by notable local architect Dan Saxon Palmer. Unusual example designed to give the appearance of two buildings.” Due to alterations to the building, including window replacements and ATM additions on the primary façades, it was determined that the property may not retain sufficient integrity for listing in the National Register.

(iii) Fairfax Theater (7901–7909 West Beverly Boulevard)

Located at the northwest corner of Fairfax Avenue and Beverly Boulevard, this one- and two-story, mixed-use commercial building was constructed in 1930 as a theater with wrapping retail storefronts and second floor offices. It was designed by architect W.C. Pennell in the Art Deco style. The building consists of a large theater auditorium with truss roof occupying the northwestern portion of the site. One- and two-story commercial spaces wrap the auditorium along Fairfax Avenue and Beverly Boulevard. The theater entrance fronting Beverly Boulevard is delineated by a projecting marquee and stepped tower element.

On September 17, 2021, the Fairfax Theater was determined eligible for listing in the National Register by the Keeper which resulted in the property being listed in the California Register. The Fairfax Theater was also designated as an HCM by the City Council on December 7, 2021. As such, the Fairfax Theatre meets the definition of a historical resource.

(iv) Air Raid Siren No. 25 (309 Ogden Drive)

This World War II-era air raid siren is located on the west side of Ogden Drive between Beverly Boulevard and the alley north of Beverly Boulevard on the sidewalk in

front of the commercial building located at 8701—8703 Beverly Boulevard. The storefront street address is shown as 309 Ogden Drive. The air raid siren, an example of the Federal Model SD-10 “Wire Spool” type, sits atop a free-standing metal pole.

Air raid siren No. 25 is treated as a historical resource because it was identified as appearing eligible for listing in the National Register, California Register, and as an HCM. Air raid siren No. 25 was found to be significant as an “air raid siren; wire spool type on a freestanding pole; associated with World War II and Cold War military infrastructure.”

(v) Other Historical Resources in the Broader Vicinity: Beverly Fairfax Historic District³¹

Although not located on parcels immediately adjacent to or directly across the street from the Project Site, the Beverly Fairfax Historic District is located north of Beverly Boulevard in the general vicinity of the Project Site. Listed in the National Register in 2018, the Beverly Fairfax Historic District includes 463 single- and multi-family dwellings generally located between North Fairfax Avenue and North Vista Street, north of Beverly Boulevard and south of Rosewood Avenue. The Historic District also includes the two blocks of North Genesee Avenue and North Spaulding Avenue, north of Rosewood Avenue.

The Beverly Fairfax Historic District was found to be significant under National Register Criterion A for its association with Los Angeles’ Jewish community starting in the 1920s. The Historic District is also eligible under National Register Criterion C as an excellent collection of Period Revival architecture, mostly in the form of multi-family residences. Its period of significance is 1924 to 1949, “during which time the district coalesced as a Jewish residential enclave and physically developed as a distinctive neighborhood of Period Revival multi-family buildings.”

The Beverly Fairfax Historic District does not include any parcels on Beverly Boulevard directly across the street from the Project Site, and therefore it is not located within the Project Site Vicinity for the purposes of the historical resources analysis, as discussed in the Historic Report. More importantly, existing and future development within the Project Site does not have the potential to directly or indirectly impact the Beverly Fairfax Historic District due to the distance between the Historic District and the Project Site.

³¹ The Beverly Fairfax Historic District is not located in the Project Site Vicinity; however, it is discussed below for informational purposes.

(2) Archaeological Resources

(a) Prehistoric Overview

Archaeology is the recovery and study of material evidence of human life and culture of past ages. As discussed in the Tribal Cultural Resources Report, evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. To be more inclusive, the Tribal Cultural Resources Report employed a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769). Refer to the Tribal Cultural Resources Report for more detailed information regarding human occupation and associated assemblages within Southern California during these prehistoric periods.

(b) Historic Period Overview

The written history of the State of California is generally divided into three periods: the Spanish Period (1769–1821), Mexican Period (1821–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, signals the beginning of the American Period when California became a territory of the United States. Refer to the Tribal Cultural Resources Report for a detailed discussion of these periods.

(c) California Historical Resources Information System Review

A records search of the California Historical Resources Information System (CHRIS) was conducted by staff at the South Central Coastal Information Center (SCCIC) at California State University Fullerton on July 15, 2021, for the Project Site and a surrounding 0.5-mile radius. The CHRIS records search is included as Confidential Appendix B of the Tribal Cultural Resources Report.³² This search included the SCCIC's collections of mapped prehistoric, historic, and built environment resources, California Department of Parks and Recreation Site Records, technical reports, and ethnographic references.

³² The records search results are considered confidential and are on file at the City for review by qualified individuals.

Additional sources that were consulted include historical maps of the Project Site and surrounding area, the National Register, the California Register, the California Historical Landmarks list, the California Points of Historical Interest list, the California Office of Historic Preservation State Historic Resources Inventory, and the Los Angeles Historic-Cultural Monuments list.

(i) Previously Conducted Cultural Resource Studies

As discussed in the Tribal Cultural Resources Report, the results of the CHRIS records search indicate that 37 cultural resource investigations have been completed within a 0.5-mile radius of the Project Site between 1976 and 2012. Of these 37 studies, six have included portions of, or the immediate vicinity of, the Project Site (LA-00128, LA-01939, LA-04558, LA-06442, LA-10507, and LA-11473). Due to SCCIC COVID-19 operation protocols, copies of four studies within the vicinity of the Project Site (LA-01939, LA-04558, LA-06442, and LA-11473) were not provided by the SCCIC and, therefore, are not summarized in the Tribal Cultural Resources Report included as Appendix C of this Draft EIR. Brief summaries of the two studies that were available (LA-00128 and LA-10507) are provided below.

- **LA-00128:** *Evaluation of the Archaeological Resources and Potential Impact of Proposed Pan Pacific Park (Kaufman 1976)* documented the results of a Phase I archaeological investigation conducted on behalf of the Los Angeles Department of Parks and Recreation. The study consisted of an archival records search and a pedestrian survey. The area of study focused on the Pan Pacific Park, which is located to the east of the Project Site. No previously recorded cultural resources were identified within the area of study, and the survey did not uncover any cultural material.
- **LA-10507:** *Technical Report—Historical/Architectural Resources—Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report (Westec Services, Inc. 1983)* documented the results of a cultural resource inventory conducted on behalf of the Southern California Rapid Transit District. The study consisted of an archival research, literature review, and a pedestrian survey. A total of 295 properties were surveyed, including a portion of the Project Site (listed as 7800 Beverly Boulevard in the survey) and nine properties in the vicinity of the Project Site. The 7800 Beverly Boulevard property was listed in the study as the "CBS Television City Parking Lot" and was found to appear ineligible for listing in the National Register.

(ii) Previously Recorded Cultural Resources

As discussed in the Tribal Cultural Resources Report, the results of the CHRIS records search indicate that there are eight cultural resources mapped by the SCCIC within

the 0.5-mile records-search radius. Of these, six are historic built environment resources and two are historic-period archaeological sites. One historic-period archaeological resource, P-19-003045/CA-LAN-003045H, is located to the immediate south of the Project Site and consists of a brick-lined structure and historic trash scatter dating between the 1910s and 1940s. P-19-003045/CA-LAN-003045H is further summarized below.

- P-19-003045/CA-LAN-003045H:** CA-LAN-003045H is a historic site measuring 2,200 feet (670 meters) east to west by 1,200 feet (365 meters) north to south, at an elevation of approximately 190 feet above mean sea level (AMSL). The site is located to the south of the Project Site. CA LAN-003045H is documented as a historic site consisting of the Gilmore Adobe, built in 1852, and a historic farmer's market, established in 1934. The site consists of four features and various trash deposits consisting of a total of 1,244 artifacts. The features are described as two manholes, a wooden feature, and two large metal pipes laid under eight smaller pipes. The collection of artifacts encountered included: glass bottles, ceramics, livery items including horse and mule shoes, various gardening tools, building materials, miscellaneous metal, and faunal bone (cow, pig, and goat). The site was originally formally recorded in 2002 by Dietler. Dietler interpreted the artifacts within the site to be representative of a wide date range from the early 19th century to the 1970s and likely associated with use of the Gilmore Adobe, The Original Farmers Market, oil drilling, and dairy farming. The Gilmore Adobe was constructed in 1852 and was in use until 1880. Afterwards the property was used as a dairy until 1904, when it began to be used for oil drilling and refining procedures. In 1934, its primary use became the location for a farmer's market.

As discussed in the Tribal Cultural Resources Report, while numerous historical-period resources were identified during the records search, no prehistoric archaeological resources or historical-period Native American resources were identified within the Project Site or within 0.5 mile of the Project Site.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the 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 a historical resource pursuant to §15064.5;

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

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

Threshold (c) was scoped out of the Draft EIR in the Initial Study, which is included in Appendix A of this Draft EIR. As demonstrated therein, impacts would be less than significant, and no further analysis is required.

For the analysis of historical and archaeological resources, the Appendix G Thresholds listed above are relied upon. The analysis also considers the factors identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate cultural resources:

(1) Historical Resources

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. A substantial adverse change in the significance of a historical resource occurs if the project involves:

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

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 a historical resource. The Standards were developed by the U.S. Department of the Interior as a means to evaluate and approve work for federal grants for historic buildings and for the federal rehabilitation tax credit.³³ Similarly, the Cultural Heritage Ordinance provides that compliance with the

³³ See 36 Code of Federal Regulations Section 67.7.

Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to HCMs.³⁴ Therefore, the Standards are used for regulatory approvals for designated historical resources, but not for evaluations of potential resources. 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.³⁵

Under CEQA, a project would have a significant effect on the environment if the project would result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a).³⁶ A substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”³⁷ The CEQA Guidelines further state that “[t]he significance of an historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local register of historic resources...or its identification in a historic resources survey.”³⁸

This refinement to the factors listed in the City’s L.A. CEQA Thresholds Guide has been reviewed and concurred with by the Department of City Planning Office of Historic Resources.

(2) Archaeological Resources

The L.A. CEQA Thresholds Guide states that a project would normally have a significant impact on 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;

³⁴ See Los Angeles Administrative Code Section 22.171.14.a.1.

³⁵ See CEQA Guidelines Section 15331 and 15064.5(b)(3).

³⁶ Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).

³⁷ CEQA Guidelines Section 15064.5(b)(1).

³⁸ CEQA Guidelines Section 15064.5(b)(2).

- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100 years old and possesses substantial stratigraphic integrity;³⁹ or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

b. Methodology

(1) Historical Resources

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 Project would result in a “substantial adverse change” in the significance of the resource or resources. As part of their evaluation for the Historic Report, HRG conducted field surveys of the existing buildings, structures, objects, and landscaped areas located on the Project Site and the Project Site Vicinity. Additionally, HRG reviewed previous historical resource evaluations, inventories, building permits, Sanborn maps, historical photographs, records searches, and newspaper articles of the Project Site and Project Site Vicinity.

(2) Archaeological Resources

Dudek requested that the staff of the SCCIC, a regional repository of the CHRIS, conduct a records search for the Project area. The purpose of the records search was to identify all previously recorded cultural resources in, and relevant reports of, the Project Site and surrounding 0.5-mile radius. The records reviewed included investigation reports and resource records from the following sources: SCCIC’s digitized collections of mapped prehistoric and historic archaeological resources and historic built-environment resources; Department of Parks and Recreation site records; technical reports; archival resources; and ethnographic references. Additional sources consulted included historical maps of the Project Site, the National Register, the California Register, the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical

³⁹ Although the CEQA criteria state that “important archaeological resources” are those which are at least 100 years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.

Interest, and the Archaeological Determinations of Eligibility. The confidential records search results are on file at the City for review by qualified individuals.

c. Project Design Features

No specific Project design features (PDFs) are proposed with regard to archaeological resources. The following PDFs are proposed with regard to historical resources:

Project Design Feature CUL-PDF-1: Project Parameters—The following Project Parameters set forth the maximum permitted development footprint and building heights for new adjacent construction and additions to the Primary Studio Complex to ensure that the historic significance of the Primary Studio Complex is not adversely impacted by new construction. These Project Parameters will not limit the land uses or floor areas permitted under the proposed Specific Plan. Conceptual diagrams illustrating the Project Parameters set forth below are included in Section 9 of the Historical Resources Technical Report—TVC 2050 Project (Historic Report), provided in Appendix C of the Draft EIR.

Rehabilitation of the Primary Studio Complex and new construction adjacent to the Primary Studio Complex will comply with the following Project Parameters:

Rehabilitation of the Primary Studio Complex

- Preserve the existing character-defining features of the Primary Studio Complex, as detailed in designated Historic-Cultural Monument (HCM) No. 1167 (CHC-2018-476-HCM), and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project).⁴⁰
- Remove the non-historic Support Building addition on the west side of the Studio Building, thereby restoring the original volume of the Studio Building, revealing the currently obstructed portions of the Studio Building's original west wall and restoring areas that have previously been removed.
- Remove up to two bays of the Studio Building's west wall to allow for an interior east-west passage through the Primary Studio Complex.

⁴⁰ The character-defining features of the Primary Studio Complex are set forth in the findings that were adopted as part of the HCM designation (CHC-2018-476-HCM), which is included in Appendix C of the Historic Report.

- Remove the non-historic Mill Addition constructed in 1969 on the east side of the Service Building.
- Retain and rehabilitate the three-story office portion of the Service Building and its steel frame and glass curtain walls on the primary (north) and east façades.
- Remove the portion of the Service Building south of the three-story office, much of which has been altered since 1963.
- Replace the portion of the Service Building south of the three-story office with new construction that partially restores the original volume of the Service Building.
- Remove and/or extend the south façade of the Studio Building by up to 20 feet south.
- Remove portions of the roof of the Studio Building above the interior east-west passage to create a partial open-air corridor.

Rooftop Addition above the Primary Studio Complex

- Design any rooftop addition as a single rectangular volume.
- Design any rooftop addition to be a separate and distinct volume rather than as an integrated extension of the Primary Studio Complex.
- Limit the height of any rooftop addition to 36 feet in height when measured from the top of the parapet of the Studio Building (approximately 84 feet above Project Grade) to the roof of the rooftop addition.
- Set back any rooftop addition a minimum of 55 feet from the north façade of the Studio Building.
- Engineer the structural support of any rooftop addition so that it could be removed without impairing the essential form and integrity of the Primary Studio Complex.

Adjacent New Buildings

- Locate new buildings immediately adjacent to the Primary Studio Complex to the east and south of the Service Building and to the west of the Studio Building.
- For any new construction immediately east of the Service Building that exceeds the height of the Service Building, any occupiable structure will be set back southerly from the north façade of the Service Building by a minimum of 60 feet and separated from the east façade of the Service Building by a minimum of 15 feet.
- For any new construction immediately west of the Studio Building that exceeds the height of the Service Building, any occupiable

structure will be set back southerly from the north façade of the Service Building by a minimum of 150 feet and separated from the west façade of the Studio Building by a minimum of 10 feet.

- Limit new construction on the west and east of the Primary Studio Complex to 225 feet in height above Project Grade.
- Design new construction to the west and east of the Primary Studio Complex as distinct volumes.
- Permit up to six open-air bridges at the interior floor levels (three on the east and three on the west) to provide pedestrian access to the Primary Studio Complex and any rooftop addition from the adjacent new buildings.

Project Design Feature CUL-PDF-2: Historic Structure Report—The Applicant will prepare a Historic Structure Report (HSR) that will further document the history of the Primary Studio Complex and guide its rehabilitation in compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The HSR will be completed prior to the development of the architectural and engineering plans for the Project. The HSR will be prepared based upon the National Park Service's Preservation Brief #43: The Preparation and Use of Historic Structure Reports. The HSR will thoroughly document and evaluate the existing conditions of the character-defining features of the Primary Studio Complex and make recommendations for their treatment. The HSR will also address changes to the buildings to suit new production techniques and modern amenities as well as their on-going maintenance after Project completion. The HSR will set forth the most appropriate approach to treatment and outline a scope of recommended work before the commencement of any construction. As such, the report will serve as an important guide for the rehabilitation of the Primary Studio Complex and will provide detailed information and instruction above and beyond what is typically available prior to the rehabilitation of a historical resource.

The analysis set forth in the Historic Report and summarized below is based on these project parameters being fixed and applicable for the duration of the Project. In addition, the Project would be developed in accordance with the Television City Historic Sign Guidelines prepared by Architectural Resources Group, provided in Appendix C of this Draft EIR.⁴¹

⁴¹ Architectural Resources Group, Television City Historic Sign Guidelines, June 5, 2020.

d. Analysis of Project Impacts

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

(1) Impact Analysis

As discussed in the Historic Report, the Project involves three activities that have the potential to impact historical resources located on the Project Site and in the Project Site Vicinity, including the demolition of certain buildings and structures, the rehabilitation of the Primary Studio Complex, and new construction on the Project Site. The proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, parking, landscaping, and open space. More specifically, the Project would permit up to 1,626,180 square feet of new development, the retention of up to 247,820 square feet of existing uses, and the demolition of up to 495,860 square feet of existing media production facilities. In addition, the Project would rehabilitate the Primary Studio Complex. In order to constitute a substantial adverse change on the significance of a historical resource, it must be shown that the significance of the Primary Studio Complex or the historical resources located in the Project Site Vicinity would be materially impaired by the proposed demolition, rehabilitation or new construction. Potential impacts to the Primary Studio Complex and the historical resources in the Project Site Vicinity are examined in detail in the Historic Report and are summarized below.

As discussed in Project Design Feature CUL-PDF-1 above, the Project would establish Project Parameters to ensure that the rehabilitation of the Primary Studio Complex preserves its historic significance and integrity and maximizes the retention of its historic fabric and character-defining features. In part, these Project Parameters set forth the removal of non-historic additions and the retention of character-defining features to ensure that the Primary Studio Complex is not adversely impacted. These Project Parameters form the basis for the conceptual design analyzed in the Historic Report, which is summarized herein. In addition, as discussed in Project Design Feature CUL-PDF-2 above, the Project would also include an HSR to guide the rehabilitation of the Primary Studio Complex in accordance with the Rehabilitation Standards. OHR would use the HSR in reviewing Project plans and approving permits pursuant to the requirements of the Cultural Heritage Ordinance.

(a) Potential Impacts from Demolition, Destruction, or Relocation

As mentioned above, the Project includes the demolition of approximately 495,860 square feet of existing production facilities on the Project Site.

The Project may demolish the East Studio Building, constructed in 1993, and all of the ancillary buildings and ancillary structures located on the Project Site. All of these buildings and structures were constructed after the period of significance associated with the Primary Studio Complex, have not been identified as historically significant contributing elements of the property, and are not considered historical resources. Therefore, the potential removal of these buildings and structures would not materially impair the historic significance and integrity of the Primary Studio Complex. Furthermore, all demolition associated with the Project would be contained within the Project Site. In addition, the Project would not relocate any identified historical resources on the Project Site.

As part of the rehabilitation of the Primary Studio Complex, the 1976 Support Building located on the west side of the Primary Studio Complex may be demolished. The 1969 Mill Addition on the east side of the Primary Studio Complex may also be demolished. The Support Building and the Mill Addition were constructed after the period of significance, have not been identified as historically significant contributing elements of the property, and are not considered historical resources. The removal of these buildings would not materially impair the historic significance and integrity of the Primary Studio Complex.

Demolition of the 1969 Mill Addition would partially restore the original volume of the Service Building. The southern portion of the original Service Building, much of which has been altered since 1963 and prior to this Project, would be demolished as part of the rehabilitation of the Primary Studio Complex. A small, single-story volume on the eastern façade of the Service Building (which has been covered up by the Mill Addition since 1969) would also be removed. The more intact northern three-story office portion and its steel frame and glass curtain walls on the primary (north) and east façades would remain. Almost all of the Service Building's character-defining features are related to its primary (north) façade. In contrast, the southern portion constitutes the rear of the building and is largely devoid of distinctive architectural detailing. Much of the eastern wall of the Service Building was removed when the 1969 Mill Addition was constructed and ad-hoc rooftop additions were constructed in the 1960s, '70s, '80s and '90s. Besides delineating the original form and volume of the original Service Building, character-defining features are largely absent from the southern portion of the Service Building.

The demolition of the portion of the Service Building south of the three-story office portion would remove some original material and alter the building's overall form and volume. This loss of integrity, however, would be counterbalanced by the removal of the 1976 Support Building, which would restore the original form and volume of the Studio Building and restore and reveal its original west wall. Because the original volume of the Studio Building would be restored, the overall form and volume of the original Primary Studio Complex would be improved. Despite some loss of integrity by removing the southern portion of the Service Building, on balance, the integrity of the Primary Studio Complex would be improved overall.

In summary, the large majority of buildings and portions thereof that may be demolished were constructed after the period of significance and therefore are not considered historically significant or included as part of the HCM. Demolition of the 1976 Support Building would restore the Studio Building to its original form and volume. The Project would demolish the portion of the Service Building south of the three-story office portion which would remove some original material and alter the building's overall form and volume. The southern portion of the Service Building contains few of the building's character-defining features and has been altered previously on multiple occasions, and its removal would not substantially reduce the overall integrity of the Primary Studio Complex. For these reasons, demolition associated with the Project would not result in a substantial adverse change in the significance of any historical resource located on the Project Site or in the Project Site Vicinity through physical demolition, destruction, or relocation. Impacts associated with demolition would be less than significant as defined by CEQA. The proposed removal of portions of the Primary Studio Complex and other buildings and structures adjacent to the Primary Studio Complex is shown in Figures 5 and 6 of the Historic Report.

For these reasons, the proposed demolition would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the Primary Studio Complex. Thus, impacts from demolition would be less than significant.

(b) Potential Impacts from Rehabilitation

The Project would rehabilitate the Primary Studio Complex, which, as discussed above, is designated as HCM No. 1167 and was assessed as eligible for listing in the National Register and the California Register. Potential impacts from rehabilitation activities, which would require some alteration of the Primary Studio Complex, are analyzed below.

(i) Existing Condition Integrity

In its current condition, the integrity of the original Primary Studio Complex has been compromised by numerous alterations and additions constructed in the past after the period of significance.⁴² These include, but are not limited to, the construction of the 1969 Mill Addition on the east side of the Service Building, the 1976 Support Building addition on the west side of the Studio Building, and numerous rooftop additions to the Service Building. These alterations expanded the original footprint and volume of the Primary Studio Complex, covered up and/or removed the east and west walls, and altered the roof

⁴² As concluded in the 2018 Historic Resource Assessment and the HCM nomination and designation, the Primary Studio Complex retains sufficient integrity to appear eligible for historic listing in its current condition despite alterations since the period of significance.

of the Primary Studio Complex. Rehabilitation of the Primary Studio Complex would remove these non-historic additions and restore portions of the original Primary Studio Complex that are currently hidden or have been removed or altered.

(ii) Proposed Rehabilitation

As noted above, the Project would remove the non-historic Support Building addition on the west side of the Studio Building, which was constructed in 1976 and is not part of the HCM. Removal of the Support Building would restore the original 1952 dimensions and volume of the Studio Building. The non-historic Mill Addition constructed in 1969 on the east side of the Service Building would also be removed, which would partially restore the original volume of the Service Building.

Removal of the Support Building on the west side of the Studio Building would reveal the remaining portions of the Studio Building's original west wall, which has been concealed by the Support Building since 1976. While it is unclear exactly how much of the Studio Building's original west wall remains, any portions that have previously been removed would be rehabilitated using historic photographs and the original architectural drawings as guidance. As set forth in Project Design Feature CUL-PDF-2, the HSR would guide the rehabilitation of the Primary Studio Complex and the treatment of character-defining features and original fabric. A small portion of the Studio Building's west wall up to approximately two bays wide would be removed to allow for an interior east-west passage through the Primary Studio Complex. On balance, by revealing and restoring the Studio Building's west wall, which has been obstructed by the Support Building since 1976, the integrity of the Studio Building and the Primary Studio Complex overall would be improved.

The majority of the east façade of the Service Building was altered when the Mill Addition was constructed in 1969. The Project would remove the Mill Addition, and the portion of the original Service Building south of the three-story office portion would be removed, much of which has been altered previously on multiple occasions. The south portion of the Service Building would be replaced with new construction that partially restores its original volume. The northern three-story office portion and its steel frame and glass curtain walls on the primary (north) and east façades would remain. As noted above, almost all of the Service Building's character-defining features are related to its primary (north) façade.

The rear (south) façade of the Studio Building may be removed and/or extended up to 20 feet south. The Project would also remove portions of the roof of the Studio Building above the interior east-west passage to create a partial open-air corridor.

Finally, the primary (north) façades of both the Service Building and the Studio Building would be retained, restored, and rehabilitated. The Primary Studio Complex would

retain its overall form, massing, and configuration despite the removal of the southern portion of the Service Building, and all of the other identified character-defining features would be restored and preserved.

(iii) Retained and Restored Historic Fabric

As discussed above, as a result of its rehabilitation, the Primary Studio Complex would retain all of the character-defining features delineated in the HCM designation. These include, but are not limited to, the “floating appearance” of the building with open ground floor set back behind pilotis; exterior concourses with railings and angled fin stanchions; central concrete entry bridge with walls, planters, railing, canopy, and metal “X” supports; glass curtain wall at north and east façades of the Service Building; projecting planters and shed roof canopy at the exterior of entry lobby; concrete panel and corrugated steel cladding; black and white color scheme with red accents; the wall-mounted signage at the corners of the Service Building; and CBS logo tiles in the main entry lobby and continuing along the south wall of the entrance hallway immediately east of the lobby.

The Project would also retain and restore the overall form, massing, and configuration of the Primary Studio Complex. The west wall of the Studio Building, which has been concealed by the Support Building since its construction in 1976, would be revealed. This would restore the original volume of the Studio Building, revealing original materials that have been hidden and restoring materials that are currently missing. The southern portion of the original Service Building, which has been altered previously on multiple occasions, would be removed and replaced with new construction that partially restores its original volume.

An analysis of the retained and rehabilitated original building envelope (i.e., the exterior walls and roof) of the Primary Studio Complex before and after the Project is summarized in Table IV.B-2 on page IV.B-46 and illustrated in Figure IV.B-3 through Figure IV.B-5 on pages IV.B-47 through IV.B-49, respectively. Overall, approximately 77 percent of the Primary Studio Complex’s original exterior walls and roof remain intact today. With the Project, approximately 66 percent of the Primary Studio Complex’s exterior walls and roof would remain after restoration and rehabilitation. As compared to existing conditions, approximately 86 percent of the existing original exterior walls and roof of the Primary Studio Complex would be retained.

(iv) Integrity After Rehabilitation

After rehabilitation, the Primary Studio Complex would exhibit an improved level of integrity in comparison to its integrity under the current condition. Removal of the 1976 Support Building would restore the original dimensions and volume of the original Studio Building, and the remaining portions of the original west wall of the Studio Building would

Table IV.B-2
Primary Studio Complex—Retention of Original Exterior Walls and Roof^a





| | Original Façade Area (sf) | Previous Façade Alterations (sf) | Original Façade Remaining | TVC 2050 Restored Façade (sf) | TVC 2050 Original Façade Removed (sf) | TVC 2050 Original Façade Retained and Restored (sf) | TVC 2050 Original Façade Remaining |
|--|---------------------------|----------------------------------|---------------------------|-------------------------------|---------------------------------------|---|------------------------------------|
| North Façade | 25,000 | 900 | 96% | — | 400 | 23,700 | 95% |
| East Façade | 29,000 | 16,100 | 44% | — | 4,800 | 8,100 | 28% |
| South Façade | 24,900 | 4,500 | 82% | — | 14,200 | 6,200 | 25% |
| West Façade | 29,200 | 19,800 | 32% | 14,200 | — | 23,600 | 81% |
| Roof | 133,000 | 13,900 | 90% | — | 21,300 | 97,800 | 74% |
| Total | 241,100 | 55,200 | 77% | 14,200 | 40,700 | 159,400 | 66% |
| <i>sf = square feet</i> ^a Exterior walls and roof retention study by RIOS Inc., 2021. Source: Historic Resources Group, 2022. | | | | | | | |

be revealed. Any missing portions of the west wall would be rehabilitated save for a portion to allow for an interior east-west passage through the Primary Studio Complex.

The Project would remove the 1969 Mill Addition, and the southern portion of the original Service Building would be removed, much of which has been altered previously on multiple occasions. The northern three-story office portion of the Service Building and its steel frame and glass curtain walls on the primary (north) and east façades would remain. The removed portion of the Service Building would be replaced with new construction that partially restores its original volume. The rear (south) wall of the Studio Building will be removed to allow for an addition on the south façade.

Finally, the primary (north) façades of both the Service Building and the Studio Building would be retained, restored and rehabilitated; it is on these façades that the majority of the identified character-defining features are located. After rehabilitation, all of the identified character-defining features would be restored and preserved.

In summary, the Project would retain and rehabilitate approximately 86 percent of the existing original exterior walls and roof of the Primary Studio Complex as compared to existing conditions. The overall form, massing, and configuration of the Primary Studio Complex would be retained and rehabilitated closer to its original appearance during its period of significance and all of the listed character-defining features would be retained and restored.

-  OUTLINE OF HISTORICAL RESOURCE
-  PREVIOUSLY ALTERED AREA
-  AREA ALTERED FOR PROJECT
-  AREA OF RESTORATION

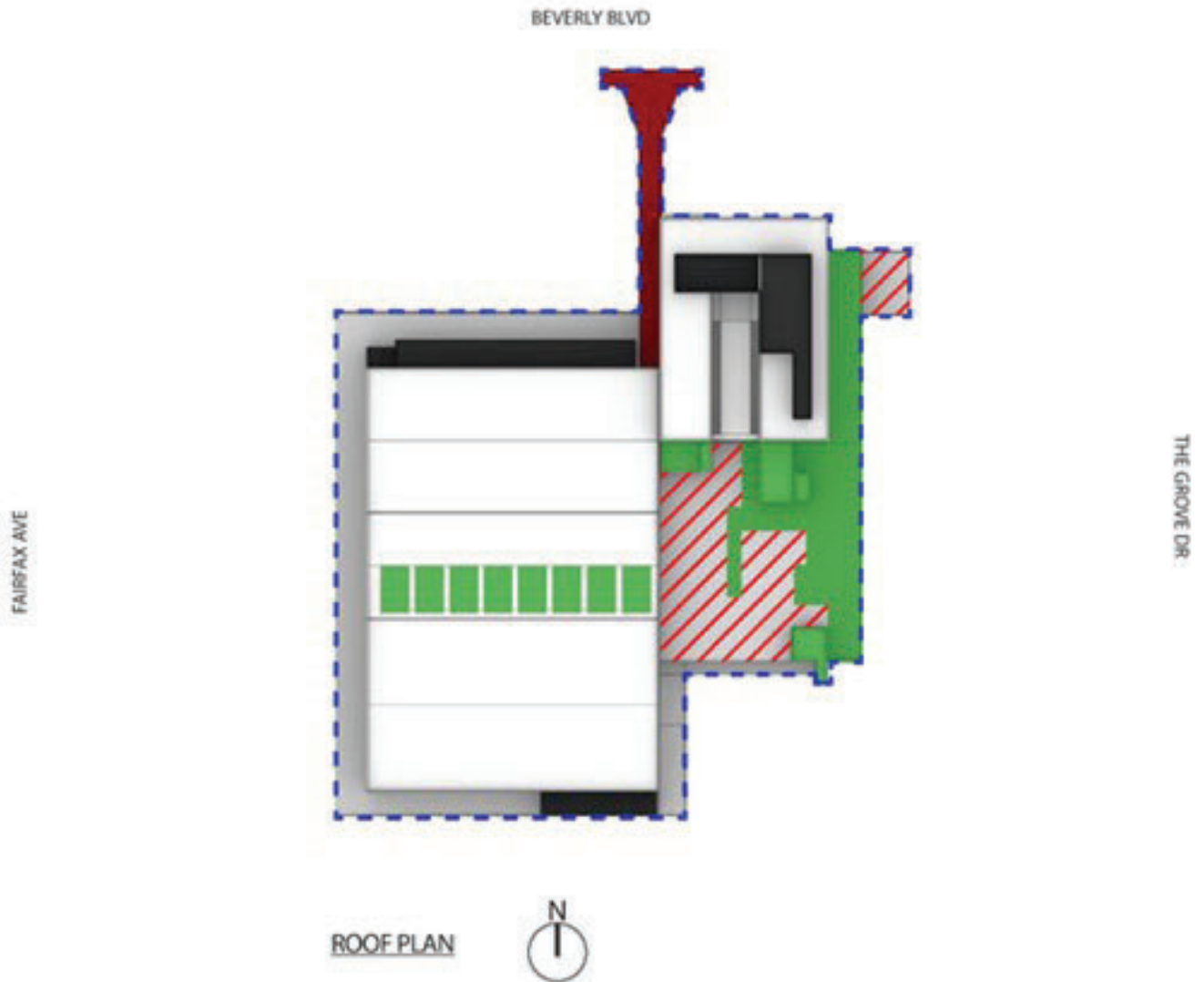




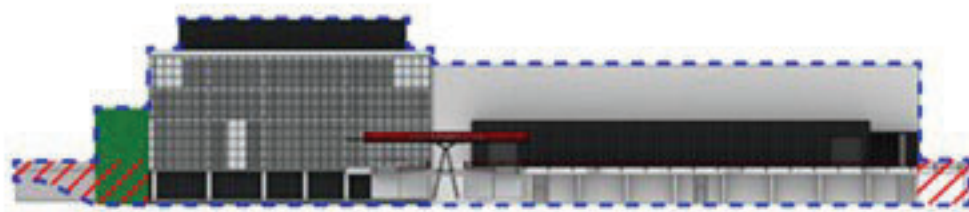
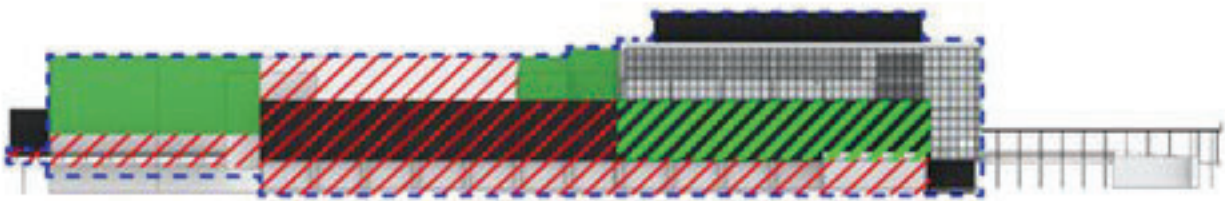


Figure IV.B-3
Primary Studio Complex Roof
Retention, Removal and Rehabilitation

-  OUTLINE OF HISTORICAL RESOURCE
-  PREVIOUSLY ALTERED AREA
-  AREA ALTERED FOR PROJECT
-  AREA OF RESTORATION







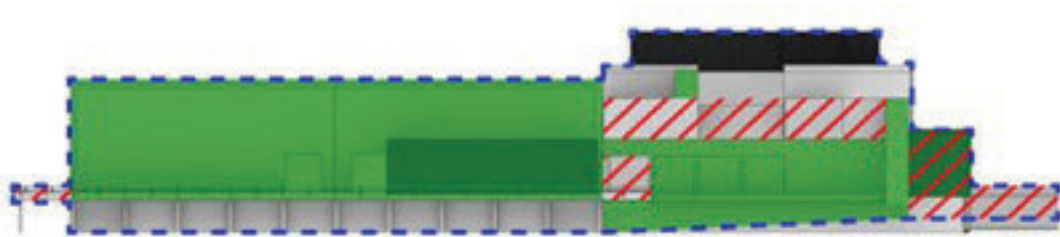
NORTH ELEVATION



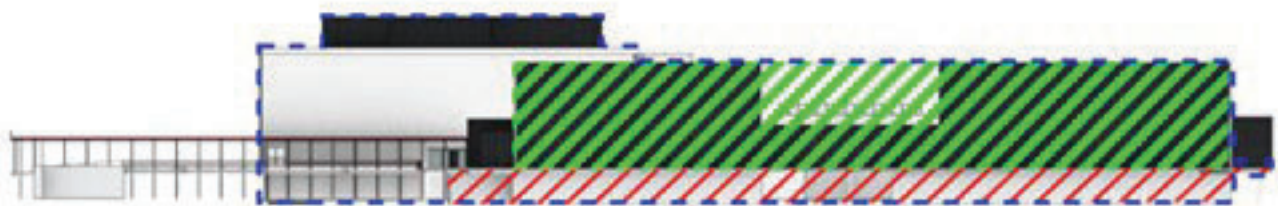
EAST ELEVATION

Figure IV.B-4
Rehabilitation of the Primary Studio Complex
North and East Elevations

-  OUTLINE OF HISTORICAL RESOURCE
-  PREVIOUSLY ALTERED AREA
-  AREA ALTERED FOR PROJECT
-  AREA OF RESTORATION



SOUTH ELEVATION



WEST ELEVATION

Figure IV.B-5
Rehabilitation of the Primary Studio Complex
South and West Elevations

For these reasons, rehabilitation of the Primary Studio Complex would not materially alter in an adverse manner the physical characteristics that convey its historical significance. Thus, impacts from the rehabilitation of the Primary Studio Complex would be less than significant.

(c) Potential Impacts from New Construction: Project Site

The Project would include new construction on the Project Site, including a rooftop addition to the Primary Studio Complex, new construction adjacent to the Primary Studio Complex, and buildout of the Project Site. Potential impacts from new construction are discussed below.

(i) Primary Studio Complex Rooftop Addition

The Project would add a rooftop addition to the Primary Studio Complex. Numerous non-historic rooftop additions have been added in the past to the Primary Studio Complex after the period of significance, as the studio has needed to expand and adapt to meet industry demands. These rooftop additions have been added in an ad-hoc manner and have resulted in a muddle of various rectangular forms with scant attention paid to their design or compatibility with the Primary Studio Complex. These non-historic rooftop additions would be removed as part of the rehabilitation of the Primary Studio Complex.

In accordance with Project Design Feature CUL-PDF-1, any rooftop addition would consist of a single rectangular volume up to approximately 36 feet in height aligned east-west across the roof of the Primary Studio Complex. Any rooftop addition would also be set back a minimum of 55 feet from the north façade of the Studio Building. This would set back any rooftop addition approximately 167 feet from the north façade of the Service Building. As such, as discussed in detail in the Historic Report, any rooftop addition would be subordinate in size and scale to the Primary Studio Complex, with the addition approximately 25 percent of the size of the Primary Studio Complex in overall volume and less than half its height. It would also be set back from the primary (north) façade of the Primary Studio Complex to further reduce its visual presence when viewed from the north. The rectangular form of any rooftop addition would be compatible with the International Style architecture of the Primary Studio Complex so that the overall form, massing, and configuration of the Primary Studio Complex would not be adversely affected. For these reasons, with Project Design Feature CUL-PDF-1, any rooftop addition above the Primary Studio Complex would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the Primary Studio Complex. Thus, impacts from the construction of any rooftop addition would be less than significant.

(ii) Studio Building Rear (South) Addition

The Project would include an addition to the rear (south) façade of the Studio Building to slightly expand the existing studios. Construction of the addition would require the removal of much of the Studio Building's south wall. The addition would be located on the rear façade of the Studio Building where its construction would not impact or interfere with the important primary (north) façade of the Primary Studio Complex or any of its character-defining features. The addition would not be visible when the Primary Studio Complex is viewed from the north, northwest, and northeast. Further, the Studio Building's south façade was previously altered prior to this Project by a non-historic addition that was added to the eastern portion of the south façade after the period of significance.

The addition would also be compatible in size, scale, and massing with the Primary Studio Complex. The addition would be substantially smaller than the Studio Building, consisting of a single rectangular volume approximately 46 feet high by 215 feet wide, extending the rear of the Studio Building an additional 20 feet to the south. The addition would be approximately three feet lower than the parapet of the existing Studio Building to ensure that the original height of the Studio Building would remain visible and discernible. The addition would also be three feet shorter in width than the Studio Building revealing the original dimension of southern façade. Because the addition would be located on the Studio Building's rear (south) façade and the addition would be compatible in size, scale, and massing, the addition would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the Primary Studio Complex. Therefore, impacts from the construction of the Studio Building addition would be less than significant.

(iii) Primary Studio Complex: Adjacent New Construction

The Project would include the construction of two buildings adjacent to the Primary Studio Complex to the east and west. Referred to as the "East Building" and "West Building," both buildings would have potential heights of up to 225 feet above Project Grade (i.e., approximately 201 feet above mean sea level). Both the East Building and West Building would also be constructed as distinct volumes, physically separated from the Primary Studio Complex by a minimum of 15 feet on the east and 10 feet on the west. Small bridges would provide pedestrian access from the East and West Buildings to the Primary Studio Complex and any rooftop addition.

Any portion of the East Building rising higher than the height of the Service Building would be set back southerly from the north façade of the Service Building by a minimum of approximately 60 feet. This setback/height limitation of the East Building would allow the full articulation of the Service Building's three-story office portion and its steel frame and glass curtain walls to be revealed when viewed from the northeast.

Similarly, any portion of the West Building rising higher than the Service Building would be set back southerly from the north façade of the Service Building by a minimum of approximately 150 feet. This would allow the currently obstructed west wall of the Studio Building, which would be restored by the Project, to become fully visible. The simple, rectangular massing of the East Building and West Building (in conjunction with any rooftop addition) would provide a deferential backdrop to the Primary Studio Complex in order to be compatible with the Primary Studio Complex.

Overall, the bulk and mass of the East Building and West Building would be concentrated towards the south, away from the primary (north) façade of the Primary Studio Complex, thereby ensuring that the Primary Studio Complex retains its visual prominence. Ultimately, construction of the East Building and West Building would not destroy any historic materials or features that characterize the Primary Studio Complex. After Project buildout, the distinctive form and design of the Primary Studio Complex would remain intact, and its architectural features would remain visible. For these reasons, construction of the East Building and the West Building would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the Primary Studio Complex. Thus, impacts from new construction adjacent to the Primary Studio Complex would be less than significant.

(iv) Project Site Conceptual Buildout

As previously discussed, the Project would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, landscaping, parking and open space. This would include both new development and the existing uses to be retained. A conceptual site plan, which illustrates one possible development scenario, is shown in Figure II-6 in Section II, Project Description, of this Draft EIR. The conceptual site plan is consistent with the Project Parameters set forth under Project Design Feature CUL-PDF-1, and Project Design Feature CUL-PDF-1 would apply to any development scenario permitted under the Specific Plan. Project Design Feature CUL-PDF-1 includes maximum permitted development areas, setbacks and heights for adjacent new buildings and additions to the Primary Studio Complex, as well as massing limitations to ensure that the Primary Studio Complex is not adversely affected.

The buildout permitted by the Specific Plan would alter the immediate surroundings of the Primary Studio Complex by adding new construction to the Project Site, replacing existing buildings and expanses of surface parking. The immediate surroundings of the Primary Studio Complex, however, have already been substantially altered since the period of significance for the Primary Studio Complex (1952–1963). Project Site construction after 1963 includes, among others, the 1969 eastern expansion of the Service Building, the 1976

Support Building constructed on the west side of the Studio Building, and the three-story, detached East Studio Building constructed in 1993. Approximately 30 ancillary buildings and structures have also been constructed on the Project Site after 1963. Additional alterations to the Project Site include the replacement of the large front lawn north of the Primary Studio Complex with surface parking, construction of multiple carports with solar panels, and the addition of perimeter fencing and plantings.

These changes over time have altered the immediate on-site surroundings such that the immediate setting no longer contributes to the historic significance or integrity of the Primary Studio Complex as noted in the 2018 Historic Resource Assessment. The Project involves new construction in areas that have already been altered since the period of significance. Therefore, the Project Site buildout would not materially impair the historic significance and integrity of the Primary Studio Complex.

In addition, the Project would open up the currently obstructed views of the Primary Studio Complex from Beverly Boulevard, thereby restoring an important character-defining viewshed feature that has been compromised in the past. Views from the public right-of-way from Beverly Boulevard are currently obstructed by security fencing planted with shrubs and climbing vines, as well as existing solar canopies. The distinctive entry bridge generally cannot be seen from Beverly Boulevard, and only the very top portion of the Primary Studio Complex is visible. The Project would include more visually transparent fencing along the northern perimeter and height restrictions between Beverly Boulevard and the Primary Studio Complex so that the currently obstructed views of the Primary Studio Complex, including the main entry bridge, would be restored.

Furthermore, the Project would comply with Section 22.171.14 of the Cultural Heritage Ordinance. The determination for the approval of a permit for substantial alteration to a designated HCM is based upon compliance with the Rehabilitation Standards. OHR is responsible for implementation of the Cultural Heritage Ordinance, and OHR would review the construction documents prior to approving building permits pursuant to the Ordinance. Thus, compliance with the Rehabilitation Standards would be ensured by OHR. Although not required by the Cultural Heritage Ordinance, the Applicant would retain a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects. The professional would create a technical memorandum at each phase of the architectural design process (including schematic design, design and development, and construction documents). In the event the plans do not comply with the Rehabilitation Standards, the memorandum would make recommendations for changes to bring the plans into compliance. The professional would then submit the memorandum to OHR for review. Pursuant to the Cultural Heritage Ordinance, building permits may be issued after OHR has confirmed that the plans comply with the Rehabilitation Standards.

For these reasons, the Project would not result in a substantial adverse change in the significance of the Primary Studio Complex by altering its immediate surroundings. Thus, impacts to the Primary Studio Complex from Project Site buildout would be less than significant.

(d) Integrity Analysis

As discussed above, integrity is the ability of a historical resource to convey its historic significance. The National Park Service defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Furthermore, as previously discussed, the original Primary Studio Complex is a designated HCM and has been assessed as eligible for listing in the National Register and the California Register. The Primary Studio Complex is significant under National Register Criterion A, California Register Criterion 1, and Los Angeles HCM Criterion 1 for its association with the television industry and its significant role in the economic development of Los Angeles. The Primary Studio Complex is also eligible under National Register Criterion C, California Register Criterion 3 and Los Angeles HCM Criterion 3 as an excellent example of an International Style television broadcasting studio and as a significant work of master architects Pereira & Luckman. It was also found eligible under Los Angeles HCM Criterion 2 for its association with important persons in the television and entertainment industry. The period of significance for the Primary Studio Complex has been defined as 1952–1963.

The 2018 Historic Resource Assessment analyzed the integrity of the Primary Studio Complex and concluded that it retained six out of the seven aspects of integrity. The 2018 Historic Resource Assessment found that the Primary Studio Complex did not retain integrity of setting due to the modifications and additions to the Project Site after the period of significance and prior to this Project. This is consistent with the HCM designation, which found that the Primary Studio Complex has retained all aspects of integrity, except for setting, which has already been lost over time.

As discussed in detail in the Historic Report, after the Project is constructed, the Primary Studio Complex would retain most of the aspects of integrity, including location, design, materials, workmanship and association. Integrity of setting has been lost over time prior to this Project, and integrity of feeling would be compromised by the Project. However, the Primary Studio Complex would still be able to convey its overall historic character, appearance, and association with its historical period when it became the first large-scale, purpose-built television facility. Moreover, with Project Design Feature CUL-PDF-2, the Project would include an HSR to guide the rehabilitation of the Primary Studio Complex in compliance with the Rehabilitation Standards and support the preservation of the Primary Studio Complex and maintain its integrity. Mitigation is not required as compliance with the Standards would be ensured by the OHR staff, who would review the construction documents prior to approving the building permits pursuant to the

Cultural Heritage Ordinance and the Specific Plan. After construction of the Project, the Primary Studio Complex would retain sufficient integrity to convey its significance. As such, the Primary Studio Complex would not be materially impaired by the Project because the Primary Studio Complex would remain eligible for designation as an HCM and for listing in the National Register and the California Register. Thus, the Project would not result in a substantial adverse change in the significance of the Primary Studio Complex, and impacts would be less than significant.

(e) Potential Impacts to Historical Resources in the Project Site Vicinity

(i) The Original Farmers Market and Rancho La Brea Adobe (6333 West 3rd Street)

The Project does not include the demolition, relocation, rehabilitation, alteration or conversion of either The Original Farmers Market or the Rancho La Brea Adobe. All of the aspects of integrity for both The Original Farmers Market and the Rancho La Brea Adobe (Gilmore Adobe) would be unaffected by the Project, and the historic integrity of both resources would be retained (with the exception of setting, which is no longer intact since construction of The Grove). After construction of the Project, The Original Farmers Market and Rancho La Brea Adobe would remain intact and continue to convey their historic significance. For these reasons, the historic significance and integrity of The Original Farmers Market and Rancho La Brea Adobe would not be materially impaired by the Project. After construction of the Project, The Original Farmers Market and Rancho La Brea Adobe would retain their eligibility for listing as an HCM, and the Project would not result in adverse impacts to either resource.

(ii) Chase Bank (312 North Fairfax Avenue)

The Project does not include the demolition, relocation, rehabilitation, alteration or conversion of the Chase Bank building. The Project involves the construction of new buildings on the Project Site directly across the street (to the south) from the Chase Bank. The Project would alter the broader surroundings of the Chase Bank by placing new buildings to the south of Chase Bank across Beverly Boulevard. However, new construction on the Project Site would not interfere with the visual and spatial relationships between the Chase Bank and its immediate surroundings. Thus, the Chase Bank's integrity of setting would be retained. In addition, all other aspects of integrity for the Chase Bank building would be unaffected by the Project, and its historic integrity would be retained. After construction of the Project, the Chase Bank building would remain intact, and continue to convey its historic significance as an excellent example of New Formalist bank architecture in the Wilshire area. For these reasons, the significance and integrity of the Chase Bank building would not be materially impaired by alterations to its broader surroundings as a result of the Project. After construction of the Project, the Chase Bank

building would retain its eligibility for listing in the California Register and designation as an HCM, and the Project would not result in adverse impacts to the Chase Bank building.

(iii) Fairfax Theater (7901–7909 West Beverly Boulevard)

The Project does not include the demolition, relocation, rehabilitation, alteration or conversion of the Fairfax Theater. The Project involves the construction of new buildings on the opposite corner from the Fairfax Theater, which is located on the northwest corner of Beverly Boulevard and Fairfax Avenue. The Project would alter the broader surroundings of the Fairfax Theater by placing new construction on the southeast corner of Beverly Boulevard and Fairfax Avenue. However, this new construction would not interfere with the visual and spatial relationships between the Fairfax Theatre and its immediate surroundings. Thus, the Fairfax Theatre's integrity of setting would be retained. In addition, all other aspects of integrity for the Fairfax Theater would be unaffected by the Project, and its historic integrity would be retained. After construction of the Project, the Fairfax Theater would remain intact and continue to convey its historic significance as an excellent example of a 1930s neighborhood movie theater. For these reasons, the significance and integrity of the Fairfax Theater would not be materially impaired by alterations to its surroundings caused by the Project. After construction of the Project, the Fairfax Theater would retain its eligibility for listing in the National Register and California Register and designation as an HCM. The Project would not result in adverse impacts to the Fairfax Theater.

(iv) Air Raid Siren No. 25

The Project does not include the demolition, relocation, rehabilitation, alteration or conversion of Air Raid Siren No. 25. All of the aspects of integrity for Air Raid Siren No. 25 would be unaffected by the Project, and its historic integrity would be retained. After construction of the Project, Air Raid Siren No. 25 would remain intact and continue to convey its historic significance as an air raid siren associated with World War II and Cold War military infrastructure. For these reasons, the historic significance and integrity of Air Raid Siren No. 25 would not be materially impaired by the Project. After construction of the Project, Air Raid Siren No. 25 would retain its eligibility for listing in the National Register, California Register and designation as an HCM, and the Project would not result in adverse impacts to Air Raid Siren No. 25.

(f) Conclusion

As summarized above, the Project would not materially impair the significance of any historical resources located on the Project Site or in the Project Site Vicinity through physical demolition, destruction, relocation, rehabilitation, or new construction. **Thus, the Project would not result in a substantial adverse change in the significance of a**

historical resource pursuant to Section 15064.5. As such, impacts to historical resources would be less than significant.

(2) Mitigation Measures

Project-level impacts related to historical resources would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to historical resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As discussed in the Tribal Cultural Resources Report, while numerous historical-period resources were identified during the records search, no prehistoric archaeological resources were identified within the Project Site or within 0.5 mile of the Project Site. Specifically, there are eight cultural resources mapped by the SCCIC within the 0.5-mile records-search radius. Of these, six are historic built environment resources and two are historic-period archaeological sites. One historic-period archaeological resource, P-19-003045/CA-LAN-003045H, is located to the south of the Project Site and consists of historic-era features and material. CA-LAN-003045H measures 2,200 feet (670 meters) east to west by 1,200 feet (365 meters) north to south, at an elevation of approximately 190 feet AMSL. CA-LAN-003045H is documented as a historic site consisting of the Gilmore Adobe, built in 1852, and The Original Farmers Market, established in 1934. The site consists of four features and various trash deposits consisting of a total of 1,244 artifacts. The features are described as two manholes, a wooden feature, and two large metal pipes laid under eight smaller pipes. The collection of artifacts encountered included: glass bottles, ceramics, livery items including horse and mule shoes, various gardening tools, building materials, miscellaneous metal, and faunal bone (cow, pig, and goat). The site was originally formally recorded in 2002 by Dietler who interpreted the artifacts within the site to be representative of a wide date range from the early 19th century to the 1970s and likely associated with use of the Gilmore Adobe, The Original Farmers Market, oil drilling, and dairy farming. The Gilmore Adobe was constructed in 1852 and was in use until 1880. Afterwards, the property was used as a dairy farm until 1904, when it began to be used for oil drilling and refining procedures. In 1934, its primary use became a farmer's market.

The Project Site has been previously disturbed and developed. Nonetheless, as discussed above, historic-period archaeological resources have been identified in the vicinity of the Project Site. Given that the Project would include excavations to a maximum depth of approximately 45 feet below ground surface, there may be a potential to encounter unknown archaeological resources that could be present at the Project Site. However, Mitigation Measure CUL-MM-1 is provided below, which includes retention of a qualified archaeologist to implement a Cultural Resource Monitoring and Treatment Plan to address the potential discovery of archaeological resources. **Therefore, with the implementation of Mitigation Measure CUL-MM-1, the Project's impacts on archaeological resources would be less than significant.**

(2) Mitigation Measures

The following mitigation measure is proposed to address the potential discovery of archaeological resources:

CUL-MM-1: Prior to the start of ground disturbance activities during Project construction, including demolition, digging, trenching, plowing, drilling, tunneling, grading, leveling, removing peat, clearing, augering, stripping topsoil or a similar activity (Ground Disturbance Activities), a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction, with an emphasis on potential historical-period materials. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements.

Prior to commencing any Ground Disturbance Activities at the Project Site, the Applicant shall retain an archaeological monitor(s) who are qualified to identify archaeological resources and who shall be approved by the Office of Historic Resources (OHR).

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural

resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities.

The archaeological monitor(s) shall observe all Ground Disturbance Activities on the Project Site that involve native soils. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project Site, the principal archaeologist shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the archaeological monitor determines that monitoring is no longer necessary.

(3) Level of Significance After Mitigation

Mitigation Measure CUL-MM-1 would provide for monitoring of ground disturbance activities in native soils on-site to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction. **With the implementation of Mitigation Measure CUL-MM-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, impacts with respect to Threshold (b) would be less than significant with mitigation incorporated.**

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP would continue to regulate development of the Project site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, given that historic and archaeological resources are site-specific and do not typically vary over the course of a 20-year timeframe, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, a total of 68 related development projects have been identified in the vicinity of the Project Site and are assumed to be built out by 2026, the Project's anticipated buildout year.⁴³ The related projects comprise a variety of uses, including apartments, condominiums, restaurants, office space, institutional uses, and retail uses, as well as mixed-use developments incorporating some or all of these elements. 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, three related projects are located in the vicinity of the Project Site.

(a) Historical Resources

Cumulative impacts may occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type or significant within the same context as the one within the Project Site. A significant cumulative impact associated with the Project and related projects would occur if the combined impact of the Project and related projects would materially and adversely alter those physical characteristics that convey the historic significance of a historical resource and that justify its listing, or eligibility for listing, as a historical resource.

In assessing cumulative impacts on historical resources, the focus is on related projects located in the vicinity of the Project Site that have the potential to contribute to alterations to identified historical resources on the Project Site and in the Project Site Vicinity. The related projects in the vicinity of the Project Site include the following:

- **Related Project No. 1** involves the construction of a mixed-use building located at 7901 Beverly Boulevard on the northwest corner of Beverly Boulevard and Fairfax Avenue. Related Project No. 1 is located approximately 105 feet from the northwest corner of the Project Site and approximately 545 feet from the northwest corner of the Primary Studio Complex.

⁴³ Construction could begin as soon as 2023 and end as soon as 2026. While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. A later buildout date would not affect the cumulative impact analysis related to cultural resources.

- **Related Project No. 4** involves the construction of a three-story office building for Jewish Family Service located at 320 Fairfax Avenue, which is located mid-block on the east side of Fairfax Avenue between Beverly Boulevard and Oakwood Avenue. Related Project No. 4 is located approximately 290 feet from the northwest corner of the Project Site and approximately 690 feet from the northwest corner of the Primary Studio Complex.
- **Related Project No. 11** involves the construction of a five-story, mixed-use, multi-family housing and retail building located at 7951 Beverly Boulevard two blocks west of the Project Site. Related Project No. 11 is located approximately 440 feet from the northwest corner of the Project Site and approximately 795 feet from the northwest corner of the Primary Studio Complex.

As discussed above, the Project's impacts on the Primary Studio Complex from the demolition, rehabilitation, and adjacent new construction associated with the Project would be less than significant. Further, the Project would not cause a substantial material change to any identified historical resources in the Project Site Vicinity such that their historical integrity or significance would be impaired. As discussed below, the combined impact of the Project and related projects would similarly not materially impair the Primary Studio Complex and other historical resources in the Project Site Vicinity, and their historic significance would not be adversely affected.

The Primary Studio Complex, designed by architects Pereira & Luckman, was the first large-scale facility designed specifically for television production in the United States. It is historically significant and eligible for listing as a historic resource for its associations with the history of broadcast television, its merit as an example of International Style architecture, and as an important work of master architects Pereira & Luckman.

Related Project No. 1 involves the demolition of the Fairfax Theatre building and the construction of a new mixed-use building. Related Project No. 1 is located northwest of the Project Site on the northwest corner of Beverly Boulevard and Fairfax Avenue. Related Project No. 1 does not include the demolition, relocation, rehabilitation, alteration, or conversion of the Primary Studio Complex. The Primary Studio Complex would remain unchanged after implementation of Related Project No. 1, and Related Project No. 1 would not result in adverse impacts to the Primary Studio Complex.

The Fairfax Theater building meets the definition of a historical resource under CEQA and its demolition by Related Project No. 1 would, therefore, result in a significant impact to a historical resource. Constructed in the Art Deco architectural style, the Fairfax Theatre is historically significant as a rare remaining example of a neighborhood theater from the 1930s and for its associations with the Jewish community in the Beverly-Fairfax neighborhood. Unlike the Primary Studio Complex, the Fairfax Theatre has no important associations with the television industry and is not a property type that is significant within

the context of the television industry. Further, the Art Deco-style Fairfax Theatre has no association with International Style architecture or the work of Pereira & Luckman. As such, the Fairfax Theater building is a different property type than the Primary Studio Complex and is significant under a separate and distinct historic context. Because the Project would not further materially impair the Fairfax Theater building or its immediate setting, the Project would not result in any additional impacts beyond those associated with Related Project No. 1 that would be cumulatively considerable.

Related Project No. 4 involved the construction of a three-story office building for Jewish Family Service located at 320 Fairfax Avenue, which was completed in 2020. As noted above, Related Project No. 4 is located approximately 290 feet from the northwest corner of the Project Site and even farther from the Primary Studio Complex (approximately 690 feet), and there are multiple buildings located in between Related Project No. 4 and the Project Site. Related Project No. 4 does not include the demolition, relocation, rehabilitation, alteration, or conversion of the Primary Studio Complex. The Primary Studio Complex would remain unchanged after implementation of Related Project No. 4, and Related Project No. 4 would not result in adverse impacts to the Primary Studio Complex. Related Project No. 4 did not involve the demolition, relocation, rehabilitation, alteration, or conversion of any historical resource; environmental review for Related Project No. 4 determined that impacts to cultural resources, including historical resources, were less than significant.⁴⁴ Because Related Project No. 4 had a less than significant impact on historical resources and the Project would not result in any additional impacts to historical resources either on the Project Site or in the Project Site Vicinity, the Project would not result in any additional impacts that would be cumulatively considerable.

Related Project No. 11 involves the construction of a five-story, mixed-use, multi-family and retail building located at 7951 Beverly Boulevard. As noted above, Related Project No. 11 is located approximately 440 feet from the northwest corner of the Project Site and even farther from the Primary Studio Complex (approximately 795 feet), and there are multiple buildings located in between Related Project No. 11 and the Project Site. Related Project No. 11 does not include the demolition, relocation, rehabilitation, alteration, or conversion of the Primary Studio Complex. The Primary Studio Complex would remain unchanged after implementation of Related Project No. 11, and Related Project No. 11 would not result in adverse impacts to the Primary Studio Complex. Related Project No. 11 would not involve the demolition, relocation, rehabilitation, alteration, or conversion of any historical resource. The City's environmental review of Related Project No. 11 determined that there would be no impacts to historical resources.⁴⁵ Because Related Project No. 11 would not result in any impacts to historical resources and the Project would not result in

⁴⁴ Case No. ENV-2015-868-MND.

⁴⁵ Case No. ENV-2018-7383-CE.

any additional impacts to historical resources either on the Project Site or in the Project Site Vicinity, the Project would not result in any additional impacts that would be cumulatively considerable.

Each of the related projects would be required to study and, if necessary, mitigate any impacts on the integrity or significance of surrounding historical resources. Even if the related projects would result in significant impacts on a historical resource, the Project's cumulative impact to historical resources would remain less than significant. **For these reasons, the Project in combination with the related projects would not materially alter the historic significance of historical resources or have a cumulatively considerable impact on the historic integrity or significance of any historical resource. Therefore, cumulative impacts to historical resources would be less than significant.**

(b) Archaeological Resources

As discussed above, with the implementation of Mitigation Measure CUL-MM-1, the Project would not result in significant impacts to archaeological resources during ground disturbing activities. Like the Project, the related projects are located in an urbanized area that has been previously disturbed. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, including CEQA Guidelines Section 15064.5, Public Resources Code Section 21083.2, as well as any site-specific mitigation identified for that related project and/or the City's standard Condition of Approval addressing the inadvertent discovery of archaeological resources. **Therefore, the Project and related projects would not result in cumulative impacts to archaeological resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts to archaeological resources would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to historical resources would be less than significant. As such, no mitigation measures related to historical resources are required. As set forth above, the Project would implement Mitigation Measure CUL-MM-1 related to archaeological resources, and thus the Project's contribution would not be cumulatively considerable, and cumulative impacts to archaeological resources would be less than significant.

(3) Level of Significance After Mitigation

Cumulative impacts related to historical resources were determined to be less than significant. Therefore, no mitigation measures related to historical resources were required

or included, and the impact level remains less than significant. **With the implementation of Mitigation Measure CUL-MM-1, the Project would not contribute to cumulative impacts associated with archaeological resources, and such cumulative impacts would be less than significant.**