

IV. Environmental Impact Analysis

C. Cultural Resources

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on cultural resources, including historical and archaeological resources. The analysis of historical resources is based on the *Historic Resources Technical Report* (Historical Resources Report) prepared for the Project by Historic Resources Group, May 2019, and included in Appendix C of this Draft EIR. The analysis of potential impacts associated with archaeological resources is based on data provided by the South Central Coastal Information Center (SCCIC), included in Appendix C of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Historical Resources

Historical resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historical resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, state, and local laws governing and influencing the preservation of historical resources of national, state, regional, and local significance include the National Historic Preservation Act of 1966, as amended; the California Environmental Quality Act (CEQA); the California Register of Historical Resources (California Register); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.120 *et seq.*), all of which are summarized below.

(a) National Register of Historic Places

Authorized under the National Historic Preservation Act of 1966, as amended, the National Register of Historic Places (National Register) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect the country's historical and archaeological resources. The National Park Service administers the National Register program. To be eligible for listing and/or to be listed in the National Register, a resource must possess significance in American history and culture,

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

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of significant persons in our past; or
- 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 history or prehistory.

In addition to meeting any or all of the criteria listed above, properties nominated must also possess historic integrity.¹ The National Park Service defines seven aspects of integrity, including *location*, *design*, *setting*, *materials*, *workmanship*, *feeling*, and *association*. These are defined by National Register Bulletin 15 as follows:²

- *Location* is the place where the historic property was constructed or the place where the historic event took place.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.

¹ *Historic integrity is defined by National Register Bulletin 16 as the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period.*

² *U.S. Department of Interior, National Park Service, National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation, 1990, revised 2002, p. 44–45.*

- *Association* is the direct link between an important historic event or person and an historic property.

While it is not necessary for a property to retain all seven aspects of integrity, or “all its historic physical features or characteristics,”³ the National Park Service notes that the property must retain “the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant and *when* it was significant.”⁴

As to *when* a property was significant, the National Park Service defines the period of significance as “the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for...listing”⁵ in the national, state, or local registers.

In evaluating a resource, a property’s *character-defining features* are also considered. *Character-defining features* are those visual aspects and physical features or elements, constructed during the property’s period of significance, that give the building its historic character and contribute to the integrity of the property.

(b) *California Register of Historical Resources*

The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation. The California Register is an authoritative guide in California 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.⁶ The criteria for eligibility for listing in the California Register are based upon National Register criteria. Specifically, in order for a property to be considered eligible for listing in the California Register, it must be significant under any of the following four criteria identified by the Office of Historic Preservation:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

³ *National Register Bulletin 15.*

⁴ *National Register Bulletin 15.*

⁵ *National Register 16A.*

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

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

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

(c) California Environmental Quality Act

CEQA requires that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any Project or action which constitutes a substantial adverse change on a historical resource has a significant effect on the environment and shall comply with the State CEQA Guidelines.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which Project impacts are considered to be significantly adverse. Specifically, a “substantial adverse change” means “demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

CEQA defines an historical resource as a resource listed in, or determined eligible for listing, in the California Register. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not a historical resource and therefore exempt from CEQA consideration. CEQA provides that a historical resource is a resource that is:

- Listed in the California Register;
- Determined eligible for the California Register by the State Historical Resources Commission;
- Included in a local register of historic resources;
- Identified as significant in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g); or

- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

(d) Local Designation

The Los Angeles City Council designates Historic-Cultural Monuments on recommendation of the City's Cultural Heritage Commission. The City's Cultural Heritage Ordinance, Chapter 9, Section 22.171.7 of the City of Los Angeles Administrative Code, defines an historical or cultural monument as:

[A] Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles. A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

- 1. 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;*
- 2. Is associated with the lives of historic personages important to national, state, city, or local history; or*
- 3. Embodies the distinctive characteristics of a 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.*

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for Historic-Cultural Monument status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria listed in the Cultural Heritage Ordinance.”

The City of Los Angeles also recognizes historic districts as Historic Preservation Overlay Zones (HPOZ).⁷ The HPOZ is a planning tool that adds a level of protection to an area by creating a review board to evaluate proposals for alterations, demolitions, or new construction. An HPOZ is intended to include a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan

⁷ *Los Angeles Municipal Code Section 12.20.3.*

or physical development. Contributing resources must meet at least one of the following criteria:⁸

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

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

SurveyLA is the City's first comprehensive program to identify and document properties that appear to be historically significant. Surveys conducted under SurveyLA cover the period from approximately 1865 to 1980 and include individual resources such as buildings, structures, objects, natural features, and cultural landscapes, as well as areas and districts. Archaeological resources will be included in a future survey phase. Significant resources reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys commenced in 2010 and have been completed. The survey results are compiled in report format and posted on the Office of Historic Resources' website.

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

⁸ *Los Angeles Municipal Code Section 12.20.3.F.3(c).*

(f) City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan includes a Conservation Element (Conservation Element). Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes a policy to continue to protect historical and cultural sites and 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.⁹

(g) Hollywood Community Plan

The Hollywood Community Plan (Community Plan), adopted in December 1988, does not specifically address historical resources. However, the Community Plan's Housing Policy "encourages the protection and enhancement of well-defined residential neighborhoods in Hollywood through (1) application of Historic Preservation Overlay Zones where appropriate, and/or (2) preparation of neighborhood preservation plans which further refine and tailor development standards to neighborhood character."¹⁰

(h) Hollywood Redevelopment Project

The Project Site is located within the Hollywood Redevelopment Project Area, which is generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Hollywood Redevelopment Project Area was established in 1984 by the Community Redevelopment Agency (CRA). The CRA was dissolved on February 6, 2012, and administration of the Hollywood Redevelopment Project Area has been transferred to the CRA/LA, a Designated Local Authority and successor to the CRA.

The goals of the Hollywood Redevelopment Project include "the retention, restoration, and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria."¹¹ As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations were compiled from historic surveys in 1986, 1997, and 2003 and were made available on the CRA website. A more

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

¹⁰ *City of Los Angeles. New Community Plan Program: Hollywood Community Plan Update.*

¹¹ *Community Redevelopment Agency of Los Angeles, Hollywood Redevelopment Plan, As First Amended on May 20, 2003.*

recent intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2010.¹² This survey provides relevant information regarding the status of properties within the Hollywood Redevelopment Project Area and is used by agencies and the community to identify potential historical resources.

(2) Archaeological Resources

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

(a) California Environmental Quality Act

State archaeological regulations affecting the Project include the statutes and guidelines contained in CEQA (Public Resources Code Section 21083.2 and Section 21084.1) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15064.5). CEQA requires lead agencies to carefully consider the potential effects of a project on archaeological resources. Several agency publications, such as the technical assistance bulletins produced by the California Office of Historic Preservation, provide guidance regarding procedures to identify such resources, evaluate their importance, and estimate potential effects.

Subdivision (c) of CEQA Guidelines Section 14 California Code of Regulations 15064.5, "Determining the Significance of Impacts to Archaeological and Historical Resources," requires that:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource.
- If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code,

¹² *Chattel Architecture, Planning, and Preservation, Inc., Historic Resources Survey, Hollywood Redevelopment Project Area, February 2010.*

and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.

- If an archaeological site does not meet the criteria for historical resources, but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2.¹³ If it can be demonstrated that a project may impact a unique archaeological resource, Section 21083.2 states that the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. In addition, to the extent that unique archeological resources are not preserved in place or left in an undisturbed state, mitigation measures shall be required as specified in Section 21083.2. The project applicant shall provide a guarantee to the lead agency to pay one-half of the estimated cost of mitigating the significant effects. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the EIR, but they need not be considered further in the CEQA process.

CEQA recognizes that archaeological resources are part of the environment, and a project that “may cause a substantial adverse change in the significance of an historical resource [including archaeological resources] is a project that may have a significant effect on the environment” (Public Resources Code Section 21084.1). For purposes of CEQA, an historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the California Register (Public Resources Code Section 21084.1). Refer to the previous discussion in this section regarding the California Register for a list of the criteria used to determine whether a resource is eligible for listing in the California Register and is, therefore, considered an historical resource under CEQA. Archaeologists assess sites based on all four criteria, but usually focus on the fourth criterion previously provided, which is whether the resource “[h]as yielded, or may be likely to yield, information important in prehistory or history.” The California Code of Regulations

¹³ *Per subdivision (g) of Public Resources Code Section 21083.2, a unique archaeological resource means 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: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.*

also provides that cultural resources of local significance are eligible for listing in the California Register (California Code of Regulations, Title 14, Section 4852).

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

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

In addition to having significance in accordance with the applicable criteria, resources must have integrity for the period of significance. The period of significance is the date or span of time within which notable events transpired at a site, or the period that notable individuals made their important contributions to a site. Integrity is the ability of that property to convey its significance.¹⁴

(b) Los Angeles General Plan Conservation Element

Section 3 of the Los Angeles General Plan Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historical 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.¹⁵

¹⁴ U.S. Department of Interior, National Park Service, *National Register Bulletin, Guidelines for Evaluating and Registering Archaeological Properties*, 2000.

¹⁵ *City of Los Angeles General Plan, Conservation Element, September 2001, pp. II-6 through II-9.*

(3) Human Remains

(a) California Environmental Quality Act

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

(b) California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission within 24 hours (Section 7050.5(c)). The Native American Heritage Commission will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by the Native American Heritage Commission. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

b. Existing Conditions

(1) Historical Resources

(a) Historical Background and Context of the Project Site

The Historical Resources 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 Historical Resources Report.

The buildings and structures that comprise the present-day Sunset Gower Studios represent a collection of resources with varying origins and associations. While most of the extant facilities on the lot were constructed by Columbia Pictures specifically for the

company's use, some facilities associated with the early development of the motion picture industry were originally constructed by William Horsley and other independent filmmakers and subsequently acquired by Columbia at a later date as the company expanded. There are also extant buildings originally developed by Horsley that continued to function independently of Columbia Studios, but were later acquired by the site's current owner, Hudson Pacific Properties, and are now considered part of the present-day Sunset Gower Studios. These facilities reflect a separate historic context and possess different historic associations than the collection of buildings that represent the history and development of Columbia Pictures. In order to understand the complex development patterns associated with the resources contained within the present-day Sunset Gower Studios, two historic contexts are presented below.

Sunset Gower Studios dates from the earliest period of motion picture industry development in Southern California. The site was first developed by film industry pioneer William Horsley in the late 1910s as a concentration of independent motion picture production studios situated at the intersection of Sunset Boulevard and Beachwood Avenue. Horsley's development exemplified the trend of rental studios that generated profits solely by providing enterprising filmmakers with leased access to production equipment and facilities at relatively little cost. This business model soon became associated with low-budget filmmaking, and concentrations of these facilities were often nicknamed "Poverty Row."

In the early 1920s, the newly formed Columbia Pictures Corporation also established operations on a small portion of the site initially developed by Horsley. For a time, the independent production facilities first developed by Horsley and other independent filmmakers continued to co-exist with the fledgling Columbia Pictures. However, within a few years of its establishment, Columbia's production demands had expanded well beyond their existing facilities, and Columbia began to acquire the adjacent property and production facilities which had originally been developed by other filmmakers. Over time, Columbia's acquisitions grew to include the entire four square blocks bounded by Sunset Boulevard on the north, Gordon Street on the east, Fountain Avenue on the south, and Gower Street on the west. After several changes in ownership following Columbia's departure from the lot in 1972, this site now houses Sunset Gower Studios.

The buildings and structures which comprise the present-day Sunset Gower Studios represent a collection of resources with varying origins and associations. While most of the extant facilities on the Sunset Gower Studios property were constructed by Columbia Pictures specifically for the company's use, some facilities associated with the early development of the motion picture industry were originally constructed by William Horsley and other independent filmmakers and subsequently acquired by Columbia. There are also two extant buildings originally developed by Horsley that functioned independently of

Columbia Studios but were later acquired by the site's current owner, Hudson Pacific Properties, and are now considered part of Sunset Gower Studios.

(i) Development of the Motion Picture Industry

The origins of motion picture production in Southern California are rooted in the arrival of two men from Chicago: Francis Boggs and Thomas Persons. Boggs, an actor and director, and Persons, a cameraman, were representatives of the Selig Polyscope Company who traveled west from Chicago in 1907 to film exterior location shots at Laguna Beach for *The Count of Monte Cristo*. The Selig Company returned to Los Angeles in March 1909 and constructed the first-even movie set in Los Angeles. The first movie to be filmed at Selig's facility was *The Heart of a Race Tout*, which was released in 1909. This film, which is believed to be the first full-length picture shot entirely in Los Angeles, "inaugurated the Los Angeles film industry."¹⁶

While the formative first decade of the film industry had been characterized by experimentation and competition amongst many small independent production companies, as the industry flourished during the 1920s, producers began to seek greater profits and more market control. These motivations gave rise to a period of consolidation when many of the pioneering studios of the 1910s underwent a process of acquisition and merger. These activities ultimately resulted in eight studios dominating the American motion picture industry. Known as the "Big Eight," these companies included Columbia Pictures, Famous Players-Lasky (now known as Paramount), Fox Film Corporation (now known as Twentieth Century Fox), Metro (now known as Metro-Goldwyn-Mayer), RKO Pictures, United Artists, Universal Pictures, and Warner Brothers. For nearly three decades, these eight companies controlled 95 percent of film revenues in the United States and set the standard for film production throughout the world.¹⁷ Their rise to dominance in the early 1920s marked the beginning of what is now referred to as "The Studio Era," which is also commonly known as Hollywood's "Golden Age."

(ii) Early Motion Picture Industry Development in Hollywood

The first motion picture to be filmed in present-day Hollywood was D. W. Griffith's *In Old California*, which was produced in 1910. However, it was not until the following year that a permanent motion picture studio would be established in the area. David Horsley, a pioneering filmmaker and founder of the New Jersey-based Centaur Film Company, decided to establish a West Coast production unit known as the Nestor Film Company. In

¹⁶ Andrew A. Erish, *Col. William N. Selig, The Man Who Invented Hollywood* (Austin, TX: University of Texas Press, 2012), 82.

¹⁷ Douglas Gomery, *The Hollywood Studio System: A History* (London: British Film Institute, 2005), 2.

1911 the Nestor Film Company leased a small property at the northwest corner of Sunset Boulevard and Gower Street. The next several years saw other motion picture studios follow suit and establish production facilities in Hollywood. By 1915, at least a dozen studios had been established in Hollywood. This number included substantial plants operated by Charlie Chaplin, Famous Players-Lasky, William Fox, and Robert Brunton.

Most of the early filmmakers who relocated their operations to Hollywood in the 1910s were considered “independent” filmmakers. While some of the independent filmmakers possessed the capital to develop their own production plants, most independent producers did not, and a real need arose for production facilities to serve the filmmakers operating without ownership of production facilities. This gave rise to the development of a distinct property type: the motion picture rental plant. Rental plants functioned as motion picture production facilities which were not affiliated with a particular studio or company, and did not produce or distribute films directly. Rental plants provided an equal-opportunity venue to producers of films of every distinction. Those enterprising individuals arriving in Los Angeles with little or no assets or experience who could not hope to align themselves with one of the major studios, or even one of the more established independents, were compelled to strike out on their own and rent production facilities, an often-temporary arrangement which lasted only as long as it took to complete the film—as inexpensively as possible. Due to the concentration of tenants who faced similar financial challenges, clusters of these facilities came to be known as “Poverty Rows.”

(iii) Columbia Pictures Corporation

Columbia Pictures was founded by Harry and Jack Cohn. Upon his arrival in Hollywood in 1920, Harry Cohn landed where many other financially challenged independent producers had before him: at Sunset and Gower, where he first leased studio space from Wilnat Films at 6070 Sunset. Over the next several years, CBC produced ten feature films, which were successful. In January 1924, Joe Brandt and Harry and Jack Cohn established Columbia Pictures Corporation and at the end of 1924 announced Columbia’s plans to replace its existing rented facilities at Sunset and Gower with a newly erected plant.

By the end of the 1920s, Columbia Pictures was included as part of the three “minor” film studios of the “Big Eight,” the others being Universal and United Artists. The “Minor Three,” along with the “Major Five” (MGM, Warner Brothers, Paramount, Twentieth Century-Fox, and RKO), produced most of the films in Hollywood during the studio era, which would last until the mid-1950s. While Columbia Pictures continued to produce films throughout the 1950s, the changing nature of the film business in the postwar era and the advent of television began to impact the studio’s bottom line. In 1968 the studio reorganized, merging Screen Gems with Columbia Pictures Corporation to become Columbia Pictures Industries. The move marked a radical organizational overhaul that

would extend into the next decade. Columbia, which had hosted independent producers on the lot at Sunset and Gower since the 1930s, amended its policy to make its Hollywood facility more attractive to independent producers. The company started building mobile units for in-house and independent producers, and by 1970 about 20 production companies were releasing through the studio and 25 independents were filming there but releasing elsewhere. The attempt at generating revenue through facility rentals came too late however, and beginning in 1970, the studio began relocating employees to Burbank, where the company had formed an alliance with Warner Brothers. By 1972, Columbia had vacated the property at Sunset and Gower entirely, after nearly 50 years of occupancy.

(iv) Development of the Recording Industry in Hollywood

While the popularity of radio broadcasting and the addition of audible dialogue in motion pictures brought sound recording to Hollywood as early as the 1920s, it was not until the years following World War II that the industry reached its peak. Where the field had once been dominated by the four major record labels—RCA, Columbia, Decca, and Capitol Records—smaller, “independent” labels began to emerge in the late 1940s and 1950s.

In 1957 Milton Tasker “Bill” Putnam traveled to Los Angeles from Chicago to scout out potential locations for a West Coast recording facility. Putnam had previously founded one of the country’s first independent recording studios, Universal Recording, in Chicago in 1946. Putnam sold his interest in Universal Recording in Chicago and relocated to Los Angeles in 1958. That same year, he established the United Recording Corporation and, using the proceeds from the sale of his Universal shares, began to explore development opportunities in Hollywood. Putnam purchased the Master Recorder facilities at 535 North Fairfax Avenue. The Master Recorders facility served as United’s temporary base of operations while Putnam’s other acquisition, a lease of the property at 6050 Sunset Boulevard, was remodeled. The 6050 Sunset Boulevard facility officially opened in 1959, and its Studios A and B became “two of the most popular places in the world for recording,”¹⁸ hosting such acts as Nat King Cole, Dean Martin, Bing Crosby, Johnny Mathis, Jan and Dean, The Righteous Brothers, Bobby Darin, Ray Charles, and Sammy Davis, Jr. One of the most notable clients to come through the door was Frank Sinatra, whom Bill Putnam met in 1960. Sinatra, whose contract with Capitol Records concluded that same year, formed his own record label, Reprise, and set up the company’s offices on the second floor at 6050 Sunset.

¹⁸ *Bob Bushnell and Jerry Ferree, From Downbeat to Vinyl: Bill Putnam’s Legacy to the Recording Industry (Morgan Hill, CA: Bookstand Publishing, 2011), 48.*

Within two years of its opening United Recording at 6050 Sunset was operating at capacity. In 1961, United acquired a controlling interest in Western Recorders, Inc., which was located two buildings to the east at 6000 Sunset. The building was subsequently renovated and included three studio spaces designed by Bill Putnam. Both facilities now functioned as part of the United Recording complex. The combined reputations of Bill Putnam and Allen Sides distinguished the United Recording facilities from others in Los Angeles. Throughout the 1970s and 1980s, recordings made at United were so successful—and critically acclaimed—that in his 2003 book on prominent recording studios, *Temples of Sound*, author Jim Cogan noted that “no other studio has won more technical excellence awards and no studio has garnered as many Best Engineered Grammys as this complex of studios on Sunset Boulevard.”¹⁹

By the early 1980s, failing health prompted Bill Putnam to cede more and more of United’s operations to Allen Sides. Sides eventually purchased the operation from Putnam and christened the 6050 Sunset facilities as Ocean Way Recording, in honor of his first studio in Santa Monica. Bill Putnam passed away in 1989; however, Allen Sides continued to dominate the recording industry with his engineering experience and innovative approach to developing new technical equipment. In 2013, Allen Sides, who over time had opened additional recording facilities in other locations under the Ocean Way brand, sold the 6050 Sunset facility to Hudson Pacific Properties, which owns the adjacent Sunset Gower property. Hudson Pacific subsequently relaunched 6050 Sunset in October 2014 under its original name of United Recording.

(b) Historical Resources Within the Project Site

(i) Historic District

SurveyLA has developed a Historic Context Statement that provides a framework for completing the city-wide historic resources surveys. The SurveyLA Historic Context Statement uses the “Multiple Property Documentation” approach developed by the National Park Service. This approach organizes the themes, trends and patterns of history shared by properties into historic contexts; identifies and describes historical resources or property types that represent the contexts; and provides specific standards to guide the evaluation of significance. Motion picture studio properties developed by one of the “Big Eight” Studios during the Major Studio Era have been identified in the SurveyLA Historic Context Statement as a significant property type for their association with the entertainment industry in Los Angeles. The Sunset Gower Studios site falls within the boundaries of the Hollywood Redevelopment Project Area and therefore is located outside the area examined by SurveyLA. As a result, while the Sunset Gower Studios may be eligible as a

¹⁹ Jim Cogan, *Temples of Sound* (San Francisco: Chronicle Books, 2003), 33.

potential historical resource under this theme, it was not identified as such through SurveyLA.

With regard to the historic significance of the Sunset Gower Studios, the property contains a distinctive collection of buildings and structures that appears to be significant for its association with the development of the motion picture industry in the United States and the concentration of the industry's production activities in Southern California. The property is important as the location of the original Hollywood studio of Columbia Pictures, one of the leading "Big Eight" studios. These studios' activities shaped the development of the film industry and contributed to the establishment of motion pictures as both the prevailing form of commercial entertainment throughout the first half of the 20th century and as one of the most influential mediums in popular culture.

The period of significance for the Sunset Gower property extends from 1918, when the property was first developed by William Horsley, to 1958, which marks the death of Harry Cohn, the pioneering president of Columbia Pictures. This timeframe includes the initial establishment of motion picture production facilities by William Horsley along Sunset Boulevard and the property's subsequent development as the home of Columbia Pictures. Horsley Studios played a critical role in launching (and relaunching) the careers of many of Hollywood's most well-known players, and William Horsley's initial investment in the property proved instrumental in facilitating the development of independent motion picture production in Hollywood. The property served as the primary production facility for Columbia Pictures for nearly 50 years, from the company's founding in 1924 until its eventual relocation to new facilities in Burbank in the 1970s.

The present-day Sunset Gower Studios property contains a concentration of buildings and structures dating from the period of significance. The majority of these buildings remain in their original locations, retaining spatial relationships and circulation patterns that have remained unchanged since the late 1930s. Buildings constructed during the period of significance include representative property types that are typical of motion picture studios from the early 20th century, such as offices, sound stages, utility buildings, and support and storage facilities. Many buildings at Sunset Gower Studios, however, were constructed as general-use buildings that served a wide variety of functions during the period of significance. As such, they often do not display the distinguishing physical form of purpose-built building types often present at other motion picture studio properties.

A boundary has been identified for a potential historic district that encompasses those areas of the site most closely associated with Columbia Pictures during the period-of-significance. Thirty-five buildings and structures are contained within the potential historic district boundary. Of these 35 buildings, 22 buildings have been identified as contributors to a potential historic district. Thirteen buildings are considered to be non-contributing resources due to extensive alterations or construction outside the period of significance.

The internal circulation pattern is also a character-defining feature of the potential Historic District, highlighting the self-contained industrial nature of studio properties and emphasizing paths of travel established through historic function and use.

Contributors, non-contributors, and the boundaries for the potential historic district are shown in Figure IV.C-1 on page IV.C-19. Buildings considered to be contributing resources to the potential historic district are those existing buildings which possess a historic association with the early development of the site for film use, the development of Columbia Pictures, date from the period of significance (1918–1958), and retain sufficient integrity to convey their historic significance. The integrity of each contributing resource was evaluated and given an assessment of Very Good, Good, Fair, or Poor, as summarized in Table IV.C-1 on page IV.C-20.

As discussed in the Historic Resources Report, the potential Sunset Gower Studios historic district appears to be significant under National Register Criterion A and under California Register Criterion 1 for its association with the development of the motion picture industry in the United States. Additionally, the Sunset Gower Studios site appears to be significant for its association with the development of the motion picture industry in the United States under the following criteria for listing as a Los Angeles Historic-Cultural Monument: in which the broad cultural, political, economic, or social history of the nation, state, or community is reflected or exemplified. Sunset Gower Studios is important as a largely intact group of resources that dates from the property's development as a motion picture studio during the silent and sound eras, and served as Columbia's primary production facility for nearly 50 years, encompassing the studio's most active period. The potential Sunset Gower Studios historic district has retained integrity of location, design, setting, feeling, and association. While integrity of materials and workmanship have been somewhat compromised by alterations, the potential historic district has retained sufficient integrity to convey its significance. For these reasons, the potential Sunset Gower Studios historic district appears to meet the criteria for listing on the National Register of Historical Places, the California Register of Historical Resources, and as a Los Angeles Historic-Cultural Monument.

(ii) Individual Historic Resources

In addition to the potential historic district, four buildings on the Project Site were evaluated as potential individual historical resources: 1455 Gordon Street, 1440 Gower Street, 6050 Sunset Boulevard, and 6060 Sunset Boulevard. One of these buildings, 1440 Gower Street (Building 35), was also identified as a contributor to the potential historic district discussed above. The remaining three buildings are located outside the boundary of the potential historic district and are associated with historic contexts which differ from that of the potential district. The four buildings evaluated as potential individual historical resources are described below.



Figure IV.C-1
Boundaries of Potential Historic District

**Table IV.C-1
Historic Resource Status of On-Site Buildings**

Current Building Name/Number	Year Built^a	Integrity^b	Historic Use^c	Building Type	Status
Building 1	Circa 1920	Fair	Office/Main Entrance	Administration	Contributor
Building 2	Circa 1930	Fair	Director's Office	Administration	Contributor
Building 3	1929	Fair	Dressing Rooms	Actor Services	Contributor
Building 5	1936	Good	Offices	Administration	Contributor
Building 7	1926	Poor	Prop Room, Special Effects Stage	Storage	Non-Contributor
Building 8/9	1979	Poor	Dressing Rooms & Offices	Actor Services	Non-Contributor
Building 9	1985	Poor	Stock Rooms	Storage	Non-Contributor
Building 10	Circa 1925	Poor	Mill	Pre-Production	Non-Contributor
Building 13	1930	Good	Scene Dock; Offices, Dressing Rooms	Storage	Contributor
Building 14	1936	Good	Electrical Generator Room	Utility Building	Contributor
Building 15	Circa 1925	Poor	"Old Laboratory," Film Cutting	Post-Production	Non-Contributor
Building 16	1930	Poor	Film Lab, Cutting Rooms	Post-Production	Non-Contributor
Building 17	Circa 1925	Good	Offices	Administration	Contributor
Building 19	Circa 1920	Poor	Film Vaults	Storage	Non-Contributor
Building 20	1934	Fair	Electric & Maintenance	Utility Building	Contributor
Building 21	1934	Fair	Sign & Scene Painting	Pre-Production	Contributor
Building 22	1935	Very Good	Camera & Music Building, Projection Room, Camera Storage	Storage	Contributor
Building 27	1988	Good	Storage	Storage	Non-Contributor
Building 28	1925	Very Good	Offices	Administration	Contributor
Building 29	2007	N/A	Storage	Storage	None
Building 29A	2007	N/A	Storage	Storage	None
Building 34	Circa 1920; Circa 1925	Good	Grip Room, Film Faults & Cutting Rooms	Post-Production	Contributor
Building 35	1951	Good	Offices, Projection Rom	Administration	Individually Eligible; Contributor

Table IV.C-1 (Continued)
Historic Resource Status of On-Site Buildings

Current Building Name/Number	Year Built^a	Integrity^b	Historic Use^c	Building Type	Status
Building 38	1951	Good	Editing	Post-Production	Contributor
Building 42	1929; 1935	Fair	Recording Building, Cutting Rooms, Dubbing Rooms, Scoring Stage	Post-Production	Contributor
Building 43	1923	Poor	Music Department Annex	Post-Production	Non-Contributor
Building 48	1988	Poor	Film Editing	Post-Production	Non-Contributor
Building 49	1928	Fair	Matte Department, Prop Warehouse	Storage	Contributor
Building 50	1925	Poor	Prop Department Office	Administration	Non-Contributor
Building 55	1963	N/A	Film Laboratory	Office	None
Building 62	1920; Circa 1920	Poor	Art Department, Dressing Rooms, Special Effects	Actor Services	Non-Contributor
Building 70	1970	N/A	Storage	Storage	None
Building 74	1927	N/A	Apartment Building; Offices	Residence	None
Parking Structure A	1988; 2007	N/A	Parking	Parking Structure	None
Parking Structure B	1984; 1997	N/A	Parking	Parking Structure	None
Parking Structure C	2016	N/A	Parking	Parking Structure	None
Restaurant	1986	N/A			None
Stage 1	1921	Fair	Sound Stage	Stage	Contributor
Stage 2	1929	Good	Sound Stage	Stage	Contributor
Stage 3 & 4	1929	Very Good	Sound Stages	Stage	Contributor
Stage 5	1920	Poor	Sound Stage, Scoring Stage	Stage	Non-Contributor
Stage 7	Relocated 1925	Fair	Sound Stage	Stage	Contributor
Stages 8 & 9	1936	Good	Sound Stages	Stage	Contributor
Stages 12 & 14	1957	Good	Sound Stages	Stage	Contributor
Stages 15 & 16	1966	N/A	Sound Stages	Stage	None

Table IV.C-1 (Continued)
Historic Resource Status of On-Site Buildings

Current Building Name/Number	Year Built^a	Integrity^b	Historic Use^c	Building Type	Status
1455 Gordon	1931	Fair	Sound research and recording; AMPAS Library, projection room, offices.	Post-Production	Individually Eligible
6040 Sunset	2008	N/A	Offices	Administration	None
6050 Sunset	1919	Fair	United Recording; Ocean Way Recording	Recording Studio	Individually Eligible
6060 Sunset	1918	Poor	William Horsley Film Laboratory	Post-Production	None

^a Construction dates obtained from building permits and certificates of occupancy issued by the City of Los Angeles Department of Building and Safety. When permits could not be confirmed for a particular building, approximate construction dates were estimated from analysis of historic aerial photographs and Sanborn maps. These dates are noted with the label “circa.” In some cases, existing building dimensions and footprints do not correspond to those found in historic building permits and Sanborn maps; occasionally, buildings previously identified as separate buildings have been combined into a single structure over time. In these instances, multiple original construction dates are listed.

^b Very Good: Buildings retain most or all of the seven aspects of integrity; exhibit the character-defining features of a distinct architectural style or type; and may exhibit minor alterations, including the replacement of some windows and/or entrance doors or the replacement of roofing material.

Good: Buildings retain most or all of the relevant aspects of integrity, likely retains integrity of design and/or workmanship; may exhibit some character-defining features of a distinct architectural style or type; may exhibit some degree of alteration, including the replacement of windows, entrance doors, railings, cladding, and/or roofing material, with generally compatible substitutes; may include subsequent additions that do not disrupt the overall building form.

Fair: Buildings retain some of the relevant aspects of integrity, but may not retain integrity of design and/or workmanship; retain original building form, massing, and scale; exhibit multiple alterations, including the replacement of windows, entrance doors, cladding, and/or roofing material, possibly with incompatible substitutes; may exhibit infill of some original windows and/or entrance doors and/or resizing of original window and door openings; may include subsequent additions to primary and/or secondary façades, but the original building form is still discernible.

^c Historical uses have been derived from Sanborn Fire Insurance Co. map for the property dated 1929, 1935, 1950, and 1955, as well as building functions delineated on a 1956 aerial photograph of the Project Site. Historic uses for buildings constructed after 1955-1956 were assigned based on a known function.

Source: Historic Resources Group, 2019.

- **1455 Gordon Street:** The building, constructed in 1931, is set at the sidewalk and is accessed from Gordon Street. In 2010, the building was assigned a status code of 3CS, or “appears to be eligible for the California Register as an individual property through survey evaluation.” At the time, it was noted that the building appeared to be significant for its association with Sunset Gower Studios,

also known as Columbia Pictures Corporation. While an association with Columbia Pictures during the period in which the studio occupied the site could not be confirmed, additional research conducted as part of the Historical Resources Report revealed that the property may be significant for its association with the Academy of Motion Picture Arts and Sciences (AMPAS). The building served as the first AMPAS library from 1935 until around 1943, a period of active development of the library's collections. The building continues to retain its integrity and retains its eligibility for the California Register. As such, it is treated as a historical resource for the purposes of this EIR.

- **1440 Gower Street (Building 35):** The building, which was constructed in 1951, is set at the sidewalk and is accessed via Gower Street. In 2010, the building was assigned a status code of 3S, or “appears eligible for the National Register as an individual property through survey evaluation.” No significance statement was provided. While the building is a contributor to the potential historic district for its association with Columbia Studios, it also appears to be individually significant as an example of the work of noted architect Claud Beelman. The building continues to retain its integrity and retains its eligibility for the National Register. As such, it is treated as a historical resource for the purposes of this EIR.
- **6050 Sunset Boulevard:** The building, constructed in 1919, is set at the sidewalk and is accessed via Sunset Boulevard. In 2010, the building was assigned a status code of 3CS, or “appears to be eligible for the California Register as an individual property through survey evaluation.” At the time, it was noted that the building appeared to be significant for its association with United Western Recorders. The building at 6050 Sunset Boulevard was initially developed in 1919 by film industry pioneer William Horsley. As discussed above in Section 2.b.(a)(ii), Bill Putnam purchased the building and remodeled the building to convert it into a recording studio. While the building no longer conveys its association with the early motion picture industry, Putnam's acquisition and conversion of the building mark the beginning of the most significant period in the building's history, and its appearance today reflects its historic identity as an important postwar recording studio. The building has retained integrity of location, design, setting, materials, workmanship, and association and has therefore retained sufficient integrity to convey its historic identity. The building continues to retain its integrity and retains its eligibility for the California Register. As such, it is treated herein as a historical resource for the purposes of this EIR.
- **6060 Sunset Boulevard:** The 6060 Sunset Boulevard building, constructed in 1918, is set at the sidewalk and is accessed via Sunset Boulevard. In 2010, the building was assigned a status code of 6Z, or “found ineligible for the National Register, California Register, or Local designation through survey evaluation” by Chattel Architecture, Planning & Preservation, Inc. as part of an intensive historic resources survey of the Hollywood Community Redevelopment Area. As the property was determined to be ineligible, no significance statement was

provided. Surveyors noted that the property had “been significantly altered and retains little or no integrity.” In particular, the building has been subject to substantial alterations over time and no longer reflects the essential elements of its original design as an early-20th century film laboratory. Additionally, extant and visible examples of original construction materials and finishes are extremely limited and are largely represented by one remaining two-story interior film vault of masonry construction located in the original laboratory building. Also, due to the building’s substantial alterations, the building no longer retains the aesthetic principles and/or physical evidence of its design and construction as an early-20th century film laboratory. Due to the extent of alterations, the building is also no longer sufficiently intact to convey the building’s relationship to its period of significance, and the building has not retained the physical elements associated with its development by William Horsley. Because the building was identified as ineligible for designation through survey evaluation, the building is not treated as a historical resource for the purposes of this EIR.

(2) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. On March 14, 2018, a cultural resources records search was conducted through the SCCIC located at the California State University, Fullerton. The results of the records search, which are included in Appendix C of this Draft EIR, indicate there are no archaeological sites located within the Project Site; however, the records search (first page of the records search results summary) identified one archaeological site within a 0.5-mile radius of the Project Site. Although the Project Site has been previously developed and graded, it has not been previously surveyed for the presence of archaeological resources. Given that structures were present from 1920 or earlier, the property may still contain buried resources.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, 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?

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations 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 factors to evaluate cultural resources:

(1) Historical Resources

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

(2) Archaeological Resources

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

b. Methodology

The Historic Resources Report provided in Appendix C of this Draft EIR is based, in part, on historic permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, primary and secondary historical accounts, as well as review of the National Register and its annual updates, the California Register, and the Los Angeles Historic Resources Survey to identify any previously recorded properties within or near the Project Site. 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.

To address potential impacts to archaeological resources, formal records searches were conducted by the SCCIC and the Natural History Museum of Los Angeles County, respectively, to assess the archaeological sensitivity of the Project Site and vicinity. In addition, an evaluation of existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources.

c. Project Design Features

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Historic District

(i) Potential Impacts to the Historic District from Demolition

As discussed above, the potential historic district consists of 35 buildings within the Sunset Gower Studios. Of these, 22 buildings have been identified as contributors to the potential historic district while the remaining 13 buildings are considered to be non-contributing resources due to extensive alterations or construction outside the period of significance.

The Project would demolish 15 buildings within the boundary of the potential historic district. As such, 20 buildings would remain within the potential historic district. Of the 15

buildings to be removed, six buildings are contributors and nine buildings are non-contributors. The six contributor buildings to be removed by the Project include the following and are further described in Table IV.C-2 on page IV.C-28:

- **Building 13:** This building was constructed in 1930 and was originally used as dressing rooms. Building 13 is currently used as an actor services building. The building's integrity is considered good.
- **Building 14:** This building was constructed in 1936 and originally housed a generator. Building 14 is currently used as a utility building. The building's integrity is considered good.
- **Building 20:** This building was constructed in 1934 and was originally used for electrical and maintenance purposes. Building 20 is currently used as a utility building. The building's integrity is considered fair.
- **Building 21:** Building 21 was constructed in 1934 and originally used for sign and scene painting. This building is currently used for pre-production. The building's integrity is considered fair.
- **Building 38:** Building 38 was constructed in 1951 and originally used for film editing. This building is currently used for post-production. The building's integrity is considered good.
- **Building 42:** Building 42 was constructed in 1929 and 1935 and originally used for film scoring and sound editing. This building is currently used for post-production. The building's integrity is considered fair.

With removal of the six contributing buildings, the Project would result in the removal of approximately 27 percent of the existing contributors to the potential historic district. For this to be considered a "substantial adverse change", it must be shown that the removal of the contributing buildings listed above would result in the physical alteration of the potential historic district such that its ability to convey its historical significance and eligibility for historic listing would be threatened.

As proposed, the Project would retain approximately 73 percent of the contributing buildings within the boundaries of the potential historic district. As discussed above, following the removal of the 15 buildings, the potential historic district would consist of 20 buildings. Of these 20 buildings, 16 buildings are potential contributors and four buildings are potential non-contributors. Within the boundaries of the potential historic district, the Project would introduce two new buildings, Building B and Building C. As a result, following implementation of the Project, the potential historic district would consist of 22 buildings, including 16 contributors and six non-contributors, resulting in a potential historic district with 73 percent contributing resources.

**Table IV.C-2
Summary of Contributor Buildings to Be Removed**

Current Building Name/ Number	Integrity	Year Built	Historic Use	Current Use	Studio Property Type
Building 20	Fair	1934	Electric & Maintenance	Office	Utility
Building 21	Fair	1934	Sign & Scene Painting	Office	Pre-Production
Building 42	Fair	1929; 1935	Recording Building; Dubbing/ Scoring Stage; Monitor & Projecting Rooms; Cutting Rooms, Film Vaults	Office	Post-Production
Building 13	Good	1930	Scene Dock; Offices, Dressing Rooms	Office	Actor Services
Building 14	Good	1936	Electrical Generator Room	Service/Utilities	Utility
Building 38	Good	1951	Cutting Room	Office	Post-Production
<hr/> <p><i>Source: Historic Resources Group, 2019.</i></p>					

After implementation of the Project, the potential historic district would continue to retain a concentration of buildings that date from the period of significance and reflect the historic identity of Columbia Studios as a “Big Eight” motion picture studio operating during the Major Studio Era. These buildings represent a large majority of the existing contributing square footage and highest levels of integrity (i.e., the ability to convey the significance of the potential historic district as evidenced by the survival of physical characteristics that existed during the property’s historic period) among the contributing buildings. The contributing buildings to remain also include all contributors located on the western edge of the property facing Gower Street, which is the only portion of the potential historic district directly visible to the public.²⁰ In addition, the proposed locations for new construction are either located outside of the potential historic district or generally retain the existing historic spatial and circulation patterns. Specifically, this includes the retention of the central Beachwood Avenue and parallel Beachwood Alley as separate and distinct streets as well as the internal pathways between buildings on the western portion of the property.

Based on the above, despite the loss of six contributing buildings, 16 of the 22 contributing buildings would remain intact and in their original location after implementation of the Project. The important configuration of buildings, spatial relationships and circulation

²⁰ *It should be noted that the Sunset Gower Studios lot is a private property with controlled access and is not open to the public.*

patterns that are characteristic of the Columbia Studios era and contribute to the historic character of the site would also remain after implementation of the Project. Therefore, as concluded in Historical Resources Report, the proposed removal of contributing buildings to the potential historic district would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance²¹. Therefore, removal of contributing buildings caused by the Project would not result in significant impacts to historical resources (i.e., the potential historic district). Notwithstanding, mitigation measures are included below to ensure the protection and proper maintenance of the potential historic district during and after implementation of the Project.

(ii) Potential Impacts to the Historic District from New Construction

The Project would construct a five-story building (Building B) and a six-story building (Building C) within the potential historic district at the center of the Project Site. In addition, the Project would construct an 18-story building (Building A) just outside the potential historic district on the northern portion of the Project Site facing Sunset Boulevard, and a bicycle parking facility located immediately outside the potential historic district in the central western portion of the Project Site. The Project would also construct a parking structure at the southeastern portion of the Project Site, along Gordon Street, which is also outside of the boundaries of the potential historic district.

National Park Service guidelines for evaluating new construction within a historic district state that:

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.²²

Following implementation of the Project, Buildings B and C would be constructed in locations currently occupied by Buildings 10, 13, 14, 20, 21, and 27. Together, these existing buildings are arranged in a linear north-south configuration set between the internal segment of Beachwood Drive and the studio buildings fronting Gower Street. This configuration of buildings defines the primary internal circulation pattern present during the Columbia Studios period. The proposed Buildings B and C would be located in largely the same linear configuration and the internal circulation pattern would be maintained. As concluded in the Historical Resources Report, the potential historic district would therefore

²¹ Refer to page 117 of the Historical Resources Report included in Appendix C of this Draft EIR.

²² National Register Bulletin 15.

retain the historic street grid and internal hierarchy of major and minor circulation routes following implementation of the Project, and would not constitute a significant new intrusion to the potential historic district.²³

At five and six stories in height, Buildings B and C would be taller than the existing buildings they would replace, which range between two and four stories in height. However, the five- and six-story heights are not substantially taller than the existing condition of the potential historic district, which contains buildings ranging from one to five stories in height. Thus, the scale of Buildings B and C would be compatible with the general heights of contributing resources within the potential historic district. Therefore, construction of Buildings B and C would not result in a significant impact to the potential historic district. In addition, Mitigation Measure CUL-MM-5 is included below to ensure the design of Buildings B and C would be compatible with the potential historic district.

At 18 stories in height, Building A would be substantially taller than any buildings currently located on the Project Site. Building A would be placed along Sunset Boulevard and would be mostly located outside of the potential historic district where it would effectively become part of the existing context of the Sunset Boulevard frontage bordering the potential historic district at its northern boundary. Motion picture studio properties dating from the Studio Era²⁴ have always been developed as enclosed compounds with perimeter walls and minimal engagement with the surrounding community. As such, the juxtaposition of high-rise development at the periphery of the Project Site would not substantially alter the integrity of the potential historic district.

As part of the Historical Resources Report, a potential boundary was identified for a potential historic district that encompassed those areas of the Sunset Gower Studios site most closely associated with Columbia Pictures during the period of significance. The development of Building A would extend southward from Sunset Boulevard into the area defined as a potential historic district. Construction of Building A would require the demolition of several ancillary buildings located within the northern edge of the district's potential boundary. These buildings are non-contributing resources to the district due to substantial alterations. Following implementation of the Project, the demolition of the non-contributing buildings, and construction of Building A, the potential boundary of the potential historic district would include a portion of the physical footprint of Building A. As a result, the boundary for the potential historic district would no longer accurately reflect only

²³ Refer to page 118 of the Historical Resources Technical Report included as Appendix C to this Draft EIR.

²⁴ The period of significance associated with the Major Studio Era has been defined by SurveyLA as 1919–1949. The period begins in 1919, when the Major Studio Era was first established in Los Angeles, and concludes in 1949 with the landmark Supreme Court decision that major film corporations relinquish their theater holdings.

the concentration of existing facilities historically associated with the operations of Columbia Pictures. Therefore, following implementation of the Project, the boundary of the potential historic district would be modified slightly along the northern line to exclude the footprint of Building A. This ensures that the district continues to accurately represent the patterns of physical development associated with its historic significance.

The proposed bicycle parking facility would adjoin Stage 7 and Building 28 to the south and would be located immediately outside the boundary of the potential historic district. The facility would be six stories and would not surpass the height of the neighboring contributing resources to the north, therefore remaining compatible with the general heights of contributing buildings within the potential historic district. Construction of the bicycle parking facility would not result in a significant impact to the adjacent potential historic district.

The proposed parking structure would be located outside of the potential historic district at the southeastern edge of Sunset Gower Studios. No contributors to the potential historic district would be located immediately adjacent to the parking structure after completion of the Project.

Construction of the Project would also include foundation work and the construction of subterranean parking. These activities could potentially damage nearby historical resources due to underground excavation and associated vibration and settlement. Therefore, the Project includes implementation of Mitigation Measure CUL-MM-6 to ensure the protection of nearby historical resources during foundation work and construction of subterranean parking.

(b) Potential Impacts to Individually Eligible Properties

As noted above, the Historical Resources Report identified three buildings on the Project Site that are eligible for historic listing as individual properties. These include the United Recording building at 6050 Sunset Boulevard; the single-story brick building at 1455 North Gordon Street; and the five-story office building at 1440 Gower Street (Building 35), which is also a contributor to the potential historic district. Potential impacts to these three properties as a result of implementation of the Project are discussed below and described in more detail on pages 120 through 123 of the Historical Resources Report included as Appendix C.

- **6050 Sunset Boulevard:** The Project would demolish the United Recording Building at 6050 Sunset Boulevard, which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument for its associations with the music recording industry in Los Angeles. Demolition of this building would result in significant impacts to a historical resource.

- **1455 Gordon Street:** 1455 Gordon Street is located on the east side of the Project Site and is separated by other buildings on the Sunset Gower Studios property. Therefore, the Project would not demolish, relocate, convert, rehabilitate, or physically alter any aspect of 1455 Gordon Street. The Project would not destroy historic materials, features, or spatial relationships that characterize the 1455 Gordon Street building. The Project would not affect the integrity of location, design, materials, workmanship, feeling, or association of 1455 Gordon Street. The only aspect of integrity that could potentially be affected by the Project is setting. Therefore, all but one of the relevant aspects of integrity would be unaffected by the Project, so that the historic integrity of the 1455 Gordon Street building would be retained. While the Project would alter the setting of 1455 Gordon Street, this alteration would not materially impair the building such that it can no longer convey its historic significance. As concluded in the Historical Resources Report included in Appendix C of this Draft EIR, after construction of the Project, 1455 Gordon Street would remain intact and continue to convey its historic significance. The Project would therefore not result in significant impacts to 1455 Gordon Street.
- **1440 Gower Street (Building 35):** Building 35 is located on the west side of the Project Site and is separated by other buildings on the Sunset Gower Studios property. The Project would not demolish, relocate, convert, rehabilitate, or physically alter any aspect of Building 35. The Project would not destroy historic materials, features, or spatial relationships that characterize Building 35. The Project would not affect the integrity of location, design, materials, workmanship, feeling, or association of Building 35. The only aspect of integrity that could potentially be affected by the Project is setting. Therefore, all but one of the relevant aspects of integrity would be unaffected by the Project, so that the historic integrity of Building 35 would be retained. While the Project would nominally alter the setting of Building 35, this alteration would not materially impair the building such that it can no longer convey its historic significance. After construction of the Project, Building 35 would remain intact and continue to convey its historic significance. However, the Project has the potential to compromise the structural integrity of Building 35 through excavation and construction activities for construction of three levels of subterranean parking, and potentially result in a significant impact to Building 35. Therefore, mitigation is included below to protect Building 35 from potential damage during construction activities.

(c) Potential Impacts to Adjacent Historic Resources

The nearest historical resource for the purposes of CEQA is East-West Studios at 6000 Sunset Boulevard. 6000 Sunset Boulevard has previously been assigned a status code of 3S, or “Appears eligible for the National Register as an individual property through survey evaluation.” The building is significant as the site of the United Western recording studios, which functioned as a satellite recording studio for the notable United Recorders at 6050 Sunset Boulevard. The building is located to the northeast of the Project Site and is

separated by other buildings on the Sunset Gower Studios property. Therefore, the Project would not demolish, relocate, convert, rehabilitate, or physically alter any aspect of 6000 Sunset Boulevard, nor would it destroy historic materials, features, or spatial relationships that characterize the 6000 Sunset Boulevard building. The Project would not affect the integrity of location, design, materials, workmanship, feeling, or association of 6000 Sunset Boulevard. The only aspect of integrity that could potentially be affected by the Project is setting. Therefore, all but one of the relevant aspects of integrity would be unaffected by the Project, and as the National Park Service notes, "it is not necessary for a property to retain all its historic physical features or characteristics,"²⁵ Therefore, the historic integrity of the 6000 Sunset Boulevard building would be retained. While the Project would alter the setting of 6000 Sunset Boulevard, this alteration would not materially impair the building such that it can no longer convey its historic significance. After construction of the Project, 6000 Sunset Boulevard would remain intact and continue to convey its historic significance. The Project would therefore not result in significant impacts to 6000 Sunset Boulevard.

The nearest designated historical resource is Columbia Square, located one block to the west of the Project Site at 6121 Sunset Boulevard, approximately 390 feet from the Project Site. As the property is not immediately adjacent to the Project at Sunset Gower Studios, there would be no impacts to adjacent historical resources.

Due to the demolition of 6050 Sunset Boulevard, the Project would cause a substantial adverse change in the significance of an historical resource, and mitigation measures are required.

(2) Mitigation Measures

CUL-MM-1: The existing condition of Sunset Gower Studios shall be documented in accordance with Historic American Building Survey (HABS) guidelines and standards. Documentation shall include a historical narrative, existing drawings and plans, and photographs of the property, with special emphasis given to documentation of contributing resources and those resources that would be demolished as part of the Project. A qualified historic preservation professional shall be retained to oversee the preparation of HABS documentation.

CUL-MM-2: A Historic Resources Plan shall be developed for Sunset Gower Studios to document existing historic resources, identify character-defining features and resources to be preserved, and establish a

²⁵ U. S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, by the staff of the National Register of Historic Places, finalized by Patrick W. Andrus, edited by Rebecca H. Shrimpton (Washington, DC: 1990; revised for Internet, 2002), www.nps.gov/nr/publications/bulletins/nrb15/, accessed September 30, 2019.

treatment plan for their continued preservation. Any future proposed rehabilitation or new additions to existing potential historic district contributors would be subject to specified guidelines and procedures set forth in the Historic Resources Plan that would identify and protect significant character-defining features and ensure that the proposed work conformed to the Secretary of the Interior's Standards.

- CUL-MM-3:** The Project shall include a multifaceted interpretive program, which will incorporate multiple mediums including physical interpretive exhibits and signage as well as an online component with digital media to document the history of the Sunset Gower Studios property and provides information and directions to access other interpretive features.
- CUL-MM-4:** The Project would include the development of a self-guided walking tour located along Gower Street, to be hosted on a web-based platform and accessible from mobile devices, which details the history of Columbia Pictures and the studio's association with the Sunset Gower property.
- CUL-MM-5:** A qualified historic preservation professional, who meets the requirements set forth by the Secretary of the Interior's Professional Qualifications Standards, shall be retained to ensure that Building A, Building B, and Building C are designed and constructed in accordance with the Secretary of the Interior's Standards for Rehabilitation to ensure that the proposed new construction shall be differentiated from existing construction and shall be compatible in design with Sunset Gower Studios in order to protect the historical integrity of the potential historic district and verify compliance with the Historic Resources Plan.
- CUL-MM-6:** The Project shall include a shoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.

(3) Level of Significance After Mitigation

As discussed above, Project-level impacts to historical resources would be significant. While implementation of Mitigation Measures CUL-MM-1 through CUL-MM-6 would reduce these impacts, impacts to historical resources would be significant and unavoidable.

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

(1) Impact Analysis

The results of the archaeological records search indicate that there are no identified archaeological sites within the Project Site and one archaeological site located within a 0.5-mile radius of the Project Site. Notwithstanding, the Project would involve excavation of the Project Site to a maximum depth of approximately 42 feet below grade, and previously unknown archaeological resources could be encountered. Therefore, the possibility exists that archaeological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-7, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. **Therefore, implementation of Mitigation Measure CUL-MM-7 would ensure that any potential impacts related to archaeological resources would be less than significant.**

(2) Mitigation Measures

Mitigation Measure CUL-MM-7: A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

(3) Level of Significance After Mitigation

Project-level impacts related to archaeological resources would be less than significant with implementation of Mitigation Measure CUL-MM-7.

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

(1) Impact Analysis

The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. In addition, if human remains were to be discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended. Specifically, no further excavation or disturbance of the construction area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the Project Site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. **With the implementation of regulatory requirements, the Project would not disturb any human remains. Impacts related to human remains would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to the disturbance of human remains would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the disturbance of human remains 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.

e. Cumulative Impacts

As indicated in Section III, Environmental Setting, of this Draft EIR, there are a total of 104 related projects in the vicinity of the Project Site. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects near the Project

Site involve a mix of residential, retail, restaurant, commercial, and office uses, consistent with existing uses in the vicinity of the Project Site.

(1) Impact Analysis

(a) Historical Resources

Cumulative impacts to historical resources would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As discussed above, the Project Site includes a potential historic district that is limited to the boundaries of the Sunset Gower Studios. As such, other related projects would not have the ability to affect the potential historic district. Similarly, the three on-site buildings determined to be eligible for historic listing as individual properties are specifically associated with the historic use of the Project Site. **Therefore, while the Project includes the removal of one of these buildings, cumulative impacts to similar historic or potentially historic resources in the vicinity of the Project Site would be less than significant.**

(b) Archaeological Resources

With regard to potential cumulative impacts related to archaeological resources, such potential impacts are generally site specific as they relate to the particular underlying conditions of a site. Notwithstanding, the Project Site vicinity is highly urbanized and has been substantially disturbed and developed over time. As with the Project, 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, Health and Safety Code Section 7050.5, and Public Resources Section 5097.9, as well as any site-specific mitigation identified for that related project. **Therefore, cumulative impacts to archaeological resources would be less than significant.**

(c) Human Remains

As with the potential for uncovering archaeological resources, the potential for discovering human remains is site specific based on the underlying conditions and historical uses of that site. Notwithstanding, like the Project, if human remains were discovered during construction of any of the related projects, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. **Therefore, with the implementation of**

regulatory requirements, cumulative impacts related to human remains would be less than significant.

(2) Mitigation Measures

Cumulative impacts to historical and archaeological resources and those related to the disturbance of human remains would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts to historical and archaeological resources and those related to the disturbance of human remains 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.