

IV. Environmental Impact Analysis

D. Cultural Resources

1. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Project. Historical Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section is based on information provided in Appendix E of this Draft EIR, which includes the *Historical Resources Technical Report for 4141 N. Whitsett Avenue, Studio City*, prepared by the Historical Resources Group (HRG), dated February 2022 (Historical Report), in Appendix E-1, and the *Harvard-Westlake River Park Project – Phase I Archaeological Resources Assessment Report*, prepared by ESA, dated January 2022 (Archaeological Report), in Appendix E-2.

2. Environmental Setting

a) Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, State, and local laws governing and influencing the preservation of cultural resources of national, State, regional, and local significance include:

- The National Historic Preservation Act of 1966, as amended;
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- California Environmental Quality Act
- California Register of Historical Resources
- California Health and Safety Code
- California Public Resources Code
- City of Los Angeles General Plan

- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171)
- City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3)
- City of Los Angeles Historic Resources Survey

(1) Federal

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

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment”.¹ The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.²

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”³

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

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;

¹ 36 Code of Federal Regulations (CFR) 60.

² United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

³ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 5.

- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁴

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

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

A resource that is listed in or eligible for listing in the National Register is considered “historic property” under Section 106 of the National Historic Preservation Act.

(i) Criteria

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

- Are associated with events that have made a significant contribution to the broad patterns of our history;
- Are associated with the lives of persons significant in our past;
- 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
- Have yielded, or may be likely to yield, information important in prehistory or history.⁵

(ii) Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic

⁴ United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, page 12.

⁵ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 8.

property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning... is made clear.”⁶ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(iii) Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance”.⁷ The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

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

(iv) Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.⁸ Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.⁹ The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

⁶ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pages 7 and 8.

⁷ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 44.

⁸ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 25.

⁹ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 41.

- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

(b) Secretary of the Interior's Standards

The National Park Service issued the Secretary of the Interior's Standards for the Treatment of Historic Properties with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction.¹⁰ The most applicable guidelines should be used when evaluating a project for compliance with the Secretary of the Interior's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary of the Interior's Standards for Rehabilitation provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

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

¹⁰ United States Department of the Interior, National Park Service, Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.¹¹

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

(2) State

(a) *California Environmental Quality Act*

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

¹¹ United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

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

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.¹² If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the

¹² California Public Resources Code Section 21083.1(a).

project on those resources shall not be considered a significant effect on the environment.¹³

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired”.¹⁴ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.¹⁵

(b) California Register of Historical Resources

The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁶ The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.¹⁷ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California

¹³ State CEQA Statute and Guidelines, Section 15064.5(c)(4).

¹⁴ State CEQA Guidelines, Section 15064.5(b)(1).

¹⁵ State CEQA Guidelines, 15064.5(b)(3).

¹⁶ California Public Resources Code, Section 5024.1[a].

¹⁷ California Public Resources Code, Section 5024.1[b].

Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

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

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

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

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

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

(c) California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These

regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

(d) *California Public Resources Code*

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

(3) Local

(a) *City of Los Angeles General Plan*

(i) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.¹⁸

¹⁸ City of Los Angeles, Conservation Element of the General Plan, 2001, pages II-3 to II-5.

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

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

(ii) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The City's 1998 Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan), which covers the four community subareas in the southeast San Fernando Valley area, is the land use element of the General Plan applicable to the Project area. The Community Plan includes land use designations, density limits, building heights, and other provisions that support the City's policies and development vision for the future. Among other planning and land use goals, objectives and policies identified in the Community Plan, regarding historic resources, pursuant to Goal 16, Preservation and Restoration of Cultural Resources, Neighborhoods, and Landmarks which have Historical and/or Cultural Significance, the following objective and policy are applicable to the Project:

Objective 16-2: To encourage private owner of historic properties/resources to conserve the integrity of such resources.

Policy 16-2.1: Assist private owners of existing and future historic resources to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.

(b) City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles

Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The criteria for HCM designation are stated below:

- The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of with historic personages important to national, state, city, or local history; or
- The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.¹⁹

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and OHR staff often ask the following questions:

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

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC

¹⁹ City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”²⁰

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

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zone (HPOZs) in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles’ first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.²¹ Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.²² For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

²⁰ City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

²¹ City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

²² City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

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

City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated 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.

b) Existing Conditions

(1) Historical Resources

(a) Historic Overview of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Planning Area's Development

The Project Site is located within the Community Plan area in the Studio City neighborhood of the City of Los Angeles.²³ Studio City extends north and south of Ventura Boulevard, into the foothills to Mulholland Drive, and is bounded by Lankershim Boulevard on the east and Coldwater Canyon Boulevard on the west.

While the San Fernando Valley is often thought of in terms of post-World War II suburban expansion, the San Fernando Valley overall, and the Community Plan area in particular, has a rich development history that reflects the same themes that shaped development throughout Southern California. These themes are discussed in the sections that follow.

(i) Late 19th-Century Development

Following the Spanish and Mexican eras, much of the Valley lands fell within the vast holdings of pioneer and farmer Isaac Lankershim, who had established an expansive wheat “empire” that included the land comprising the Community Plan area. During the real estate boom of the 1880s, Lankershim’s son, James B. Lankershim, subdivided and sold 12,000 acres of land along the eastern portion of the family’s farm. This area extended from the center of the Community Plan area, near Whitsett Avenue in western Studio City, to the Burbank city line.

(ii) Early 20th-Century Development

By 1900, only a few thousand people lived in the San Fernando Valley. In the Community Plan area specifically, most of the land remained agricultural, with an abundance of fruit orchards, grazing lands, and wheat fields. In the first quarter of the 20th century, changes in infrastructure, transportation, and industrial development started to alter the agricultural character of the San Fernando Valley. The early 1910s brought two major changes: 1911 signaled the arrival of the Pacific Electric Streetcar line through the Cahuenga Pass; and in 1913, the establishment of the Owens Valley aqueduct brought water to Los Angeles via the San Fernando Valley. Two years later, San Fernando Valley residents voted in favor of annexation by the City of Los Angeles. As with other Southern California towns during the boom years of the 1920s, large swaths of the Community Plan area were platted and prepared for residential settlement and commercial development.

²³ History of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area excerpted and adapted from City of Los Angeles, Department of City Planning, Historic Resources Survey Report: Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area, prepared by Historic Resources Group, January 2013.

While improvements in infrastructure and transportation made living in the San Fernando Valley more viable, the catalyst for widespread settlement was the arrival of the entertainment and aerospace industries, both of which became major employment centers for residents of the Community Plan area. As Hollywood's entertainment industry expanded, the undeveloped terrain and relatively inexpensive real estate of the San Fernando Valley provided ideal locations for new studios and production facilities. The first step toward establishing what was colloquially referred to as "Valleywood" came in 1912, when a nascent Universal Studios moved to an area near the mouth of Cahuenga Pass, just outside the Community Plan area. Headed by German-born film distributor Carl Laemmle, Sr., Universal Studios expanded quickly, becoming a stand-alone municipality and major employer in the area.

A decade later, two other studios turned their attention toward the San Fernando Valley. In 1926, First National Studios (which merged with Warner Brothers) was established in southwestern Burbank, near the border of the Community Plan area. That same year, construction began on Mascot Studios (later Republic Studios, now the CBS Studio Center) on Ventura Boulevard near Radford Avenue in Studio City. Mascot Studios was founded by Mack Sennett, actor, Keystone-comedy producer, and early Studio City developer and booster. In order to spur settlement in Studio City, Sennett established the Central Motion Picture District, Inc., a consortium founded along with producer Al Christie and real estate professionals to support economic growth and residential development in the area. The Central Motion Picture District, Inc. subdivided tracts for residential and commercial development, including along Agnes Avenue (subdivided in 1927) and a portion of the commercial area now known as Tujunga Village (also subdivided in 1927). With the establishment of Mascot Studios, settlement in the adjacent Laurel Terrace neighborhood, one of Studio City's earliest neighborhoods, accelerated significantly in the late 1920s and 1930s.

(iii) *Depression Era and World War II Development, 1930-1945*

Expansion of "Valleywood" continued in the 1930s with the founding of a Columbia Pictures' location ranch and Disney Studios, both in Burbank. The Community Plan area's emerging neighborhoods became home to many prominent early actors, directors, producers, screenwriters, and other studio employees and tradespeople. The presence of many stars and "picture people" figured prominently in marketing and press about these neighborhoods, including Toluca Lake Park in Toluca Lake and Laurel Terrace in Studio City.

By the 1930s, the San Fernando Valley had also become one of the fastest growing centers for the aviation industry in the United States, one of the major employers in the San Fernando Valley. The San Fernando Valley boasted three airports by 1930: the Los Angeles Metropolitan Airport in Van Nuys, dedicated in 1928; Glendale's Grand Central Airport, in 1929; and United Field in Burbank, established under the auspices of Boeing, in 1930. In September 1929, the *Los Angeles Times* reported that in five years, the total

assessed real estate valuation for the San Fernando Valley had doubled, indicating “the influence of the extensive aircraft developments” in the area. According to the article, “a total of \$7,500,000 invested in three major airport developments...plus \$5,000,000 in street improvement projects, are said to be the largest contributing factors” behind this expansion.²⁴

Between 1930 and 1940, the population of the San Fernando Valley more than doubled, climbing from 51,000 in 1930 to 112,000 by 1940. The strength of the San Fernando Valley’s aerospace industry meant that, with the federally-financed expansion of aviation and defense-related manufacturing in the early 1940s, the San Fernando Valley also experienced a wartime boom. Between 1940 and 1945, the population expanded another 50 percent, to 176,000.

(iv) Postwar Development, 1945 - 1970

The demand for housing following World War II was central to the development of the Community Plan area. Anticipating postwar growth, the City initially planned for the development of the San Fernando Valley to follow prevailing regional planning principles, with small urban employment centers and residential subdivisions surrounded by agricultural land. However, due to the area’s exponential growth and unprecedented demand for housing, agricultural land was quickly converted into residential subdivisions.

The strength of the San Fernando Valley’s employment centers, and abundance of land contributed to a dramatic post-World War II construction and population boom, similar to that experienced throughout Southern California. By 1950, the population had again more than doubled, to 402,000. This increase was facilitated by improvements to transportation arteries serving the Community Plan area, which would later include the construction of the Ventura and Hollywood Freeways.

The 1950s and 1960s brought new subdivisions and an increase in new construction throughout the Community Plan area, with concentrations of new buildings added in the areas south of Ventura Boulevard near Vineland Avenue, extending toward Mulholland Drive, as well as the hillside communities throughout the Cahuenga Pass, Studio City, and Sherman Oaks.

(b) Historical Background of the Project Site

The Project Site was part of a land grant made to Isaac Lankershim in 1869 by Pio Pico. By the 1890s, it was part of Wilson Weddington’s ranch. Weddington established a sheep farm on his land in the 19th century, but quickly thereafter began to grow wheat and casaba melons before abandoning agricultural pursuits as Studio City developed.²⁵ In 1927, the river running alongside the Project Site was dedicated to Municipal

²⁴ Los Angeles Times, Property Valuation Reported, San Fernando Valley Area Declared to Have Doubled in Five Years, September 8, 1929.

²⁵ Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012.

Improvement District #61 for the development of a flood control system.²⁶ The river was realigned between 1928 and 1938. Between 1931 and 1939, the Property was occupied by a horse-riding academy.²⁷

In the 1950s, the Weddingtons entered into a 50-year lease agreement with Joe Kirkwood, Jr., who established his Golf & Sporting Center on the property in 1955 and designed the course. Kirkwood's initial plans for the Center, slated to cost \$1.25 million, including \$65,000 for a golf clubhouse, included an 18-hole golf course and driving range, "a gigantic bowling center, championship swimming pool and a big ice rink [...as well as], to be designed by architect William Bray,²⁸ and a drive-in restaurant."²⁹ A later version of the project planned for "a swimming pool, bowling alley, tennis courts, badminton courts and an ice-skating rink,"³⁰ in addition to a nine-hole golf course and driving range.

Ultimately, the Joe Kirkwood Golf & Sporting Center included a nine-hole golf course, driving range, putting green, and golf clubhouse. Every hole in the golf course was "an exact duplicate of a famous hole in a golf course elsewhere in the world."³¹ The driving range opened to the public on January 5, 1956; the golf course followed in mid-May of that year.³² During the Center's first two weeks of business, it attracted 21,000 golfers. In June 1956, a permit was taken out for a Ranch-style golf shop and clubhouse designed by Bray.³³ By August 1956, it had "been averaging 750 players a week using the nine-hole golf course and approximately 2,500 people a week using the practice range."³⁴ With its association with Joe Kirkwood, Jr., and its proximity to movie studios, the club attracted numerous studio executives and movie stars throughout its history, including Bob Hope, Clint Eastwood, and Don Cornelius.³⁵

In January 1957, Raul Smith and business partners George McCallister and Arthur Anderson were "negotiating to buy Joe Kirkwood's interest in the Joe Kirkwood Golf

²⁶ Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012.

²⁷ Illustrated Daily News, Popular Southland Riding Terminal, August 29, 1931.

²⁸ Valley Times, 21,000 Play on Fairways of Kirkwood, January 23, 1956.

²⁹ Valley Times, Pete Kokon, "What's Cookin' With Kokon," July 6, 1955.

³⁰ Charles Curtis, Golfagraphs: Littler Defends Montebello Title, Los Angeles Times, December 11, 1955. These additional facilities were never constructed; George McCallister and Arthur Anderson added the first tennis courts to the site in 1973.

³¹ Valley Times, Kirkwood Course in May 13 Bow, Valley Times, April 12, 1956.

³² Valley Times, Advertisement, January 3, 1956; Kirkwood Course in May 13 Bow, Valley Times, April 12, 1956.

³³ City of Los Angeles Department of Building and Safety building permit VN06384, June 30, 1955.

³⁴ Valley Times, First Ace Recorded on Kirkwood Links, August 29, 1956.

³⁵ Jeff Meyers, *Los Angeles Times*, The Main Course: Studio City Club a Star Attraction for Those With Taste for Golf, November 26, 1987; Michael Ventre, Peace, Love & Soul: The Legacy and Final Sign-Off of Don Cornelius, *Ventura Blvd*, <https://venturablvd.goldenstate.is/peace-love-soul-the-legacy-and-final-sign-off-of-don-cornelius/>, accessed December 16, 2020)

Center.”³⁶ Smith, McCallister, and Anderson held fifty percent of the lease, and wanted to purchase Kirkwood’s half of the agreement.³⁷ By May 1957, Kirkwood was no longer financially associated with the club.³⁸ The course’s name was subsequently changed to the Studio City Golf Course the following year.³⁹ Raul Smith later left the partnership, leaving McCallister and Anderson the sole owners of the golf course.

During their ownership, McCallister and Anderson made continuous improvements to the property. McCallister redesigned the course to make play easier, filling in the water and sand traps, and rebuilding the greens.⁴⁰ In the 1960s, McCallister aspired to open a nursery, and planted small palm trees in pots on the Project Site that he intended to sell. This idea did not come to fruition, and the palm trees were eventually planted on the course grounds.⁴¹ McCallister also presided over the installation of an irrigation system and the addition of fir and citrus trees and “hundreds of rose bushes” on the course grounds.⁴² Among other changes to the club, McCallister and Anderson began offering lessons “to anybody who could hold a club,” at cut-rate prices. The women’s lessons, offered on Monday mornings, proved particularly popular, with attendance increasing each week.⁴³ McCallister’s son John, who became manager of the club in 1978, developed his own instruction method, the “JM Concept,” and “like an assembly line, [created] new golfers who return often to play the course.”⁴⁴

In 1966, McCallister built an enclosure at the driving range, creating ten sheltered tees. In 1973, the fifth and sixth tees were shortened and repositioned to accommodate the addition of five tennis courts to the Project Site, spurred by Anderson’s love of the game.⁴⁵ Four more were added the following year.⁴⁶ At this time, the Project Site became known as the Studio City Golf and Tennis Club. Later, the driving range was reduced in width to accommodate another eleven tennis courts. Four tennis courts were removed in 2006 to

³⁶ Valley Times, Pete Kokon, What’s Cookin’ with Kokon, January 9, 1957.

³⁷ Valley Times, Pete Kokon, What’s Cookin’ with Kokon, Valley Times, January 9, 1957.

³⁸ Valley Times, Pete Kokon, What’s Cookin’ with Kokon, Valley Times, May 4, 1957.

³⁹ Open Corporates, Studio City Golf Course, Inc., https://opencorporates.com/companies/us_ca/C0350782, accessed December 15, 2020.

⁴⁰ Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012.

⁴¹ Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012.

⁴² Los Angeles Times, Jeff Meyers, The Main Course: Studio City Club a Star Attraction for Those With Taste for Golf, November 26, 1987.

⁴³ Los Angeles Times, Jeff Meyers, The Main Course: Studio City Club a Star Attraction for Those With Taste for Golf, November 26, 1987.

⁴⁴ Los Angeles Times, Jeff Meyers, The Main Course: Studio City Club a Star Attraction for Those With Taste for Golf, November 26, 1987.

⁴⁵ City of Los Angeles Department of Building and Safety building permit VN01709, August 22, 1973; Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012.

⁴⁶ Valley News, Give Conditional Approval for 4 Tennis Courts, October 17, 1974.

accommodate the construction of the adjacent Los Angeles City Fire Station. The Studio City Golf and Tennis Club became Weddington Golf & Tennis in 2007.⁴⁷

(c) *Historic Resources Identified on Project Site*

(i) *SurveyLA finding (2013)*

As previously indicated, SurveyLA is the City of Los Angeles' citywide survey of historic resources, conducted in accordance with the standards and guidelines set forth by the National Park Service and the California State Office of Historic Preservation, and overseen by the City's Office of Historic Resources. The SurveyLA survey of the Community Plan area, which includes the Project Site, was completed in January 2013.

SurveyLA recorded Weddington Golf & Tennis as an "Excellent and rare example of a 1950s recreational facility (golf and tennis club) in Studio City. Built on the former sheep ranch of San Fernando Valley pioneer Wilson C. Weddington. In 1955, Weddington's son Fred, a real estate developer, leased the property to actor Joe Kirkwood, who built the golf course. The tennis courts were added in the 1970s. This property is a rare remaining example of a recreational landscape in Studio City from this period. The property appears to meet the eligibility standards; however, because it is not fully visible from the public right-of-way the evaluation could not be completed." .⁴⁸

According to SurveyLA methodology, "only resources that have been identified as significant within the contexts developed for SurveyLA [were] fully recorded."⁴⁹ Properties were evaluated for listing in the National Register of Historic Places, California Register of Historical Resources, and for local designation. Typically, unless the survey team noted issues with a resource's integrity in the field, properties were evaluated as eligible for listing at the federal, state, and local levels, and assigned the appropriate status codes of 3S, 3CS, and 5S3.

As noted above, because Weddington Golf & Tennis is not fully visible from the public right-of-way, the Weddington Golf & Tennis property was unable to be fully evaluated during SurveyLA, and therefore, the status codes assigned during SurveyLA are considered provisional in nature; that is, the survey results are only preliminary findings based upon limited information.

⁴⁷ The Property was referred to in newspaper articles and announcements as "Studio City Golf & Tennis" as late as 2007. However, that same year, the name "Weddington Golf & Tennis" begins to appear in newspaper articles. Google Street View photography of the golf club from 2007 shows that the sign said "WEDDINGTON GOLF & TENNIS" at that time.

⁴⁸ "Historic Districts, Planning Districts and Multi-Property Resources," City of Los Angeles, Department of City Planning, Historic Resources Survey Report: Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area, prepared by Historic Resources Group, January 2013, pages 189-190.

⁴⁹ City of Los Angeles, Department of City Planning, Office of Historic Resources, Field Survey Results Master Report, August 2016, page 7.

(ii) Previous Historic Resource Assessment (2012)

Prior to the release in 2013 of the SurveyLA findings for Weddington Golf & Tennis, Architectural Resources Group (ARG) was hired by Planning Associates, Inc., to complete a historic resources assessment of Weddington Golf & Tennis. The ARG Historical Resources Assessment Report (ARG Report), which was completed in 2012, found that the property “appears eligible for the California Register of Historical Resources, with the exclusion of the tennis facilities.”⁵⁰ ARG found the property eligible for listing in the California Register of Historical Resources as a community recreation center from the 1950s and 1960s in the San Fernando Valley; and for representing the essential characteristics of a community golf course in the mid-1950s, with high associative value. No period of significance was defined. The ARG Report identified character-defining features of Weddington Golf & Tennis, including the 9-hole golf course, the park-like setting on the property, the clubhouse (including board-and-batten siding, shake roof with rectangular cut-outs at planters, brick fireplace and chimney, knotty-pine interior paneling, and lunch counter), the driving range with shed-roof canopy, the putting green, and the golf ball-shaped light standards. The ARG Report was prepared as part of the environmental review of a proposed project and evaluated Weddington Golf & Tennis “against the criteria of the California Register of Historical Resources, as is required by CEQA. It was not evaluated for national (National Register) or local (Los Angeles Historic-Cultural Monument) landmark eligibility.”⁵¹

(iii) City of Los Angeles Historic-Cultural Monument Designation

In 2021, the Project Site was designated a Historic-Cultural Monument under the name Studio City Golf and Tennis Club. The findings from the Cultural Heritage Commission discussion noted:

Studio City Golf and Tennis Club “exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community” as an excellent example of a 1950s private recreational facility open for public use in Studio City. [Historic-Cultural Monument Criterion 1]

Studio City Golf and Tennis Club “embodies the distinctive characteristics of a style, type, period, or method of construction,” including the clubhouse, golf ball light standards, putting green, and brick wall with weeping mortar surrounding the

⁵⁰ Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012, page 1.

⁵¹ Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012, page 27.

front lawn at the northeast edge of the property, as an excellent example of a 1950s community recreational facility. [Historic-Cultural Monument Criterion 3].⁵²

(iv) *Description of Identified Historical Resources on Project Site*

A description of the previously identified potentially eligible historical resource recorded within the Project Site, as well as the overall setting of the Project Site, are provided below. In addition, more detailed descriptions of the potentially eligible historical resource and the Project Site are included in the Historical Report, provided in Appendix E-1 of this Draft EIR.

(a) *Studio City Golf and Tennis Club/Weddington Golf & Tennis*

The former Studio City Golf and Tennis Club, now Weddington Golf & Tennis, at 4141 N. Whitsett Avenue occupies a sloping, irregularly shaped parcel, bounded by Bellaire Avenue to the west, Valley Spring Lane to the north, the Los Angeles River to the south, and Whitsett Avenue to the east. It is situated on the west side of Whitsett Avenue, north of the intersection of Whitsett Avenue and Valleyheart Drive. The Project Site is flanked to the north, east, and west by one- to four-story single- and multi-family residences, and to the south by the Los Angeles River, Valleyheart Drive, and Los Angeles Fire Department Station 78.

The primary physical characteristics of the Project Site include a nine-hole golf course, a twenty-five-stall driving range, sixteen tennis courts, a tennis shack, a clubhouse, a putting green surrounded by a brick wall, and six golf ball-shaped light standards. The Project Site also has a surface parking lot located along the west property line, and numerous mature trees. Among these components of the Project Site, the clubhouse, putting green with brick wall, and golf ball-shaped light standards are identified as character-defining features that support its status as a Historic-Cultural Monument, as well as it being a private recreational facility open for public use. These characteristics of the property are described below.

(i) *Golf Course and Driving Range*

The nine-hole golf course, landscaped with wide expanses of grass and stands of mature trees, occupies much of the property, extending along the north, west, and south property lines, and surrounding the driving range to the north, west, and south. The course is surrounded by high chain link fence and is accessed via the clubhouse and a concrete path with a low wood fence. The twenty-five-stall driving range, landscaped with a wide expanse of grass and surrounded by a high chain link fence and netting, extends westward from the surface parking lot to the center of the property. The stalls are situated

⁵² Studio City Golf and Tennis Club Historic-Cultural Monument Application, Council File: 21-0470, Revised Findings, as modified by PLUM Committee, September 14, 2021, adopted by City Council, September 29, 2021.

on a concrete pad and separated by low metal railings with metal mesh. Accessed by an asphaltic concrete pathway, the stalls are sheltered by a shed roofed structure supported by square wood posts, with a metal roofed extension supported by slender metal posts. There are built-in golf bag stands at the rear of each stall.

(ii) *Tennis Courts and Tennis Shack*

The sixteen tennis courts are clustered at the southeast corner of the Project Site, each surrounded by chain link fencing and accessed via a concrete pathway from the surface parking area. The tennis shack is located at the southwest corner of the parking lot. The one-story, Ranch style building is rectangular in plan, with simple massing and asymmetrical composition.

(iii) *Clubhouse (Character-Defining Feature)*

The clubhouse is located at the northeast corner of the Project Site. It is situated at an angle, facing the corner of Whitsett Avenue and Valley Spring Lane, and is deeply set back behind the putting green, which also serves as a front lawn for the clubhouse. Mature trees and shrubs in raised brick planters surround the clubhouse.

The one-story, Ranch style clubhouse is rectangular in plan, with low, horizontal massing and asymmetrical composition. There is a moderately-pitched side gable roof with nested gables, wood shingles, and wide overhanging rakes and eaves with exposed rafter tails. There is an interior brick masonry chimney. There is a wide, partial-width porch with exposed rafters supported by square wood posts and a square wood beam and a decorative metal pendant light fixture at the east (primary) façade, and a wide, projecting, full-width porch with exposed rafters supported on wood beam and metal posts at the west (rear) façade. Exterior walls are clad in board-and-batten siding. Fenestration consists primarily of wood sash fixed and sliding windows with projecting wood sills; there are full-height wood frame plate glass windows at the primary façade. Several windows at the south façade have metal grills. The primary entrance is recessed beneath the partial-width porch on the east façade and consists of a pair of fully glazed aluminum frame storefront doors, accessed from the parking lot via a curvilinear path paved in asphaltic concrete. There is a low brick planter to the south of the primary entrance, and a cutout in the roof above. A secondary entrance is asymmetrically located on the west façade and consists of a pair of fully glazed aluminum storefront doors recessed beneath the wide overhang.

The interior of the clubhouse is divided into a lobby, a golf shop, office spaces, restrooms, and a café/lunchroom area. There is a prominent brick masonry fireplace with a raised hearth and mantel in the lobby. The ceiling is composed of exposed rafters, a ridge beam, and diagonal sheathing; walls are clad in knotty pine wall paneling with a corbeled plate rail. There are decorative wrought iron chandeliers at the lobby and golf shop.

A summary of available building permits for the Project Site is included as Appendix A, in the Historic Report, included as Appendix E-1, of this Draft EIR.

(iv) *Putting Green and Brick Wall with Weeping Mortar (Character-Defining Feature)*

The putting green, which is used for golf, also acts as a front lawn for the clubhouse, which is deeply set back behind it. The putting green is surrounded by a combed brick wall with weeping mortar. Mature trees and shrubs in raised brick planters surround the putting green, and clubhouse.

(v) *Golf Ball-Shaped Light Standards (Character-Defining Feature)*

Six golf ball-shaped light standards line the property to the west of the surface parking area. The golf ball-shaped light standards are positioned between the surface parking lot and the driving range stalls.

(2) Archaeological Resources

(a) *Prehistoric and Ethnographic Setting*

The chronology of Southern California human occupation is typically divided into three general time periods: the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

The Project Site is located in a region traditionally occupied by two ethnographic groups: the Tataviam and Gabrielino.

Tataviam territory was concentrated primarily along the upper reaches of the Santa Clara River drainage between the San Fernando Valley to the south at Pastoria Creek in the Tehachapi Mountains to the north. Their territory also included east Piru Creek and the southern slopes of the Sawmill and Liebre Mountains, and extended into the southern end of the Antelope Valley.⁵³ The northern boundary was likely along upper Piru Creek, south of Hungry Valley and Cañada de los Alamos (Johnson and Earle, 1990). Tataviam territory was bounded by the Gabrielino to the south, the Serrano to the east, the Kitanemuk to the northeast, the Emigdiano Chumash to the north, and the Ventureño Chumash to the west.

Tataviam villages varied in size from larger centers with as many as 200 people, to smaller villages with only a few families (King and Blackburn, 1978). At the time of Spanish contact, the Tataviam population is estimated to have been less than 1,000. Primary vegetable food sources included acorns, juniper berries, seeds, and yucca buds.

⁵³ Chester J. King and Thomas C. Blackburn, Tataviam, In California, edited by Robert F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, (Washington, D.C.: Smithsonian Institution, 1978), 535-537.

Small game such as antelope and deer supplemented these foods. Trade networks between inland groups such as the Tataviam, the coastal regions, and desert regions enabled the trade of exotic materials such as shell, asphaltum, and steatite. The nearest village to the Project Site was *Cahuenga* located approximately 1 mile to the southeast.⁵⁴

The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.⁵⁵ The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison.⁵⁶ The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.⁵⁷

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.⁵⁸ The closest villages to the Project Site were the village of Kaweenga, located in what is present-day Universal City 3 miles east of the Project Site, and the village of Siutcanga located in what is present-day Encino 6 miles west of the Project Site. (McCawley, 1996). The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County⁵⁹ depicts two villages in the vicinity of the Project approximately 6 miles east and 6 miles west of the Project Site, respectively.

⁵⁴ Fernandño Tataviam Band of Mission Indians (FTBMI). n.d. Fernandño Tataviam Band of Mission Indians Historical Tribal Territory. Map on file at the Fernandño Tataviam Band of Mission Indians.

⁵⁵ A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

⁵⁶ Lowell J. Bean and Charles R. Smith. “Gabrielino, in California,” edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

⁵⁷ A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

⁵⁸ Blake Gumprecht, Los Angeles River: Its Life, and Possible Rebirth (Baltimore: The Johns Hopkins University Press, 2001).

⁵⁹ Los Angeles Public Library, Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860-1937, Electronic resource, <https://www.lapl.org/collections-resources/visual-collections/kirkman-harriman-pictorial-and-historical-map-los-angeles>, accessed March 20, 2019.

(b) *SCCIC Records Search*

A records search for the Project was conducted on November 12, 2020 at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all recorded cultural resources and previous studies within the Project Site and a one mile radius of the Project Site. Given the built nature of the Project Site and vicinity, and the relative dearth of archaeological resources in these types of settings, a 1 mile records search radius was used to capture any previously recorded archaeological resources in the records search radius as a means of predicting the types of resources that may be identified in the Project Site and its immediate vicinity.

(i) *Previous Cultural Resources Investigations*

The records search results indicate that 15 cultural resources studies have been conducted within a one mile radius of the Project Site. Approximately 10 percent of the 1 mile records search radius has been included in previous cultural resources surveys. None of the 15 previous studies overlap the Project Site. Although not on file at the SCCIC, an additional study⁶⁰ was identified and includes the entirety of the Project Site. This study was solely a historic resources assessment report and did not include an archaeological resources component. As such, the Project Site has not been previously subject to archaeological resources survey.

(ii) *Previously Recorded Cultural Resources*

The records search results indicate that eight cultural resources have been previously recorded within a one mile radius of the Project Site. All eight previously recorded cultural resources are historic architectural resources consisting of the following: a bridge at Moorpark Street over the West Branch of the Tujunga River (P-19-187568); another bridge located at Moorpark Street over the Los Angeles River (P-19-187570); four transmission lines (P-19-192538, -192539, -192540, and -192621), one commercial building, as located at 12840 Riverside Drive (P-19-189975); and one hotel, the Sportsmen's Lodge as located at 12833 Ventura Boulevard (P-19-190329). None of the eight resources overlap the Project Site. No archaeological resources were identified as a result of the records search.

(c) *Archeological Sensitivity*

As presented in the Archaeological Report, included in Appendix E-2, of this Draft EIR, a geoarchaeological review, including evaluation of geologic maps, soil maps, and geotechnical testing results, was conducted to assess the potential for subsurface archaeological resources within the Project Site. Given the Holocene-age of the alluvial parent material, which encompasses the entirety of human occupation of the region, there is the potential for intact subsurface archaeological deposits to underlie the Project Site.

⁶⁰ Architectural Resources Group, Weddington Golf & Tennis Club: Historic Resources Assessment Report, prepared for Planning Associates, Inc., January 30, 2012.

The assumed soil profile within the Project Site is assumed to be comprised of fill material extending from the surface to a minimum depth of 2 feet and a maximum depth of 7 feet⁶¹ followed by a C-horizon, which would extend from the depth of fill to a maximum depth of 6.6 feet.⁶² Given the disturbed nature of the fill material, there is no potential for it to contain intact archaeological deposits. However, the C-horizon presumed to underlie the fill material has the potential to contain intact archaeological deposits given the age of its parent material. As such, if intact subsurface archaeological deposits are present within the Project Site, they would be more likely to be found within the C-horizon beyond the 2-foot minimum depth of fill material.

3. Project Impacts

a) Thresholds of Significance

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

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

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

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

Under CEQA, and as relates to Threshold (a) above, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historical resource. The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards) were developed as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (see 36 Code of Federal Regulations (CFR) Section 67.7). Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a "safe harbor" by providing either a categorical exemption or a negative declaration for a project which meets the Standards (see CEQA Guidelines Sections 15331 and 15064.5(b)(3)).

⁶¹ Geotechnologies, Geotechnical Engineering Investigation Proposed Academic and Athletic Development 4141 Whittsett Avenue, Studio City, California, Prepared for Harvard-Westlake School, 2020.

⁶² Natural Resources Conservation Service (NRCS). 2017a. Palmview Series. Electronic resource, https://soilseries.sc.egov.usda.gov/OSD_Docs/P/PALMVIEW.html, accessed December 3, 2020; See also Natural Resources Conservation Service (NRCS). 2017b. Tujunga Series. Electronic resource, https://soilseries.sc.egov.usda.gov/OSD_Docs/T/TUJUNGA.html, accessed December 3, 2020.

For this analysis, the Appendix G Thresholds 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 factors to evaluate cultural resources impacts are listed below:

(1) Built Environment

- A project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 when one or more of the following occurs:
 - Demolition of a significant resource.
 - Relocation that does not maintain the integrity and significance of a significant resource.
 - Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards).
 - Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

(2) Archaeological Resources

- 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.
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

b) Methodology

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. In general, a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). In addition, while assessing the project's impacts

under CEQA, it is important to consider the ability of the historical resources to retain their integrity. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment. This analysis of impacts to historical resources is based on the detailed technical information provided in both the Historical Report provided in Appendix E-1, of this Draft EIR as well as the Phase I Archeological Resources Technical Report provided in Appendix E-2, of this Draft EIR.

(1) Historical Architectural Resources

The analysis in this section of the Draft EIR is primarily based on information presented in the Historical Report, included in Appendix E-1 of this Draft EIR. As described in the Historical Report, a research effort and field inspection was undertaken in the preparation of the report that focused on historical resources located on the Project Site, itself, and included review of the following: the SurveyLA Eligibility findings to identify any previous evaluations of the Project Site; the California Office of Historic Preservation's Built Environment Resource Directory (BERD), which is a database of previously evaluated resources throughout the State maintained by that office; a records search at the CHRIS SCCIC, historic newspaper articles, and building permits. The records search included a review of all previous cultural resource studies and previously documented historic or architectural resources on the Project Site. Research was also conducted regarding the presence of historic resources in the vicinity of the Project Site as identified by SurveyLA.

(2) Archaeological Resources

The analysis of impacts to archaeological resources is based on the Archeological Report, included in Appendix E-2 of this Draft EIR, which includes: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a 1 mile radius of Project Site, as well as a review of cultural resource reports and historic topographic maps on file; (2) a review of the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State HRI listings; (3) geoarchaeological review; (4) a review of available Sanborn Maps, historic aerial imagery; and, (5) an archaeological resources survey of the Project Site. The archaeological resources survey of the Project Site was conducted on November 24, 2020. The survey was aimed at identifying archaeological resources within or immediately adjacent to the Project Site. Survey methodology varied based on the specific conditions within the Project Site. Flat, accessible areas with visible ground surface were subject to pedestrian survey using transect intervals spaced no more than 10 meters (approximately 30 feet) apart. These areas consisted of primarily of existing dirt trails. Landscaped areas, as well as slopes greater than 30 percent and/or thick vegetation were subject to an opportunistic survey strategy wherein trails, clearings, rodent burrows, and other areas of bare earth were intensively inspected for the presence of cultural resources. Paved areas were not surveyed due to the lack of ground surface visibility. No archaeological resources were identified as a result of the survey.

The potential for the Project Site to contain buried archaeological resources was assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources), land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

c) Project Design Features

The following Project Design Feature is applicable to the Project with regard to historic resources:

CUL-PDF-1: Rehabilitation Plan. A Rehabilitation Plan will be prepared as part of the Project to ensure appropriate treatment and protection of the identified character-defining features on the Project Site. This includes the appropriate treatment of the golf ball-shaped light standards during relocation, and documentation that the rehabilitation of the clubhouse, putting green, and low brick wall with weeping mortar complies with the Secretary of the Interiors Standards for Rehabilitation (the Standards). Standards compliance is required by the City of Los Angeles Cultural Heritage Ordinance for properties that are designated Historic-Cultural Monuments (Los Angeles Administrative Code, Section 22.171.14). The Project team will include a historic architect or qualified historic preservation consultant who meets the Secretary of the Interior's Professional Standards in Architectural History or Historic Architecture. The Rehabilitation Plan will be submitted for review and approval by the Department of City Planning, Office of Historic Resources. At a minimum, the Rehabilitation Plan will address the following:

- Appropriate measures for the relocation of the golf ball-shaped light standards.
- Appropriate measures for protecting all identified character-defining features of the Project Site during construction activity. If necessary, a physical barrier (e.g., exclusion or cyclone fencing) will be erected to separate and protect the clubhouse, and other features as needed, during construction.
- Retention and appropriate treatment of the significant characteristics of the original Ranch-style architecture and the relationship of the clubhouse within the context of the Project Site overall and its relationship to other character-defining features on the Project Site and in the surrounding neighborhood. This includes retaining the clubhouse in its historic location, and maintaining the significant features that have collectively served as the public face of the Project Site since the 1950s as identified in the Historical Report, including: the clubhouse's angled position facing Whitsett Avenue and Valley Spring Lane; the existing setback; the relationship of the clubhouse and the putting green; the mature trees; the golf ball-shaped light standards; and the low brick wall.
- Retention and rehabilitation of the distinctive features of the exterior of the clubhouse, including its original Ranch-style plan, massing, and original architectural details as identified in the Historical Report. The Project is not proposing significant additions to the clubhouse, or alterations to the building that would obscure or remove important exterior features.

- Retention and rehabilitation of the distinctive original features of the interior of the clubhouse as identified in the Historical Report.

CUL-PDF-2: Documentation. In order to memorialize the extant features of the Project Site prior to implementation of the Project, the Project Site will be documented according to Historic American Buildings Survey (HABS) Level III standards to include: sketch plan; a maximum of 40 photographs with large-format negatives that documents the Project Site overall and the relationship of the features on the Project Site, exterior and significant interior spaces of the clubhouse, and views of the associated putting green and low brick wall; and golf ball-shaped light standards; and short form historical report. The documentation will be reviewed and approved by the Department of City Planning, Office of Historic Resources. The documentation will be retained on-site, and digital copies will be offered to the following repositories: Los Angeles Public Library, Los Angeles Office of Historic Resources, and San Fernando Valley Historical Society.

CUL-PDF-3: Interpretation. Harvard-Westlake School will prepare interpretation of the history of the Project Site to be housed on-site. The interpretive program may be housed in the clubhouse and may include historic photographs or other ephemeral materials documenting the history of the Weddington family, the development of the San Fernando Valley, and the history of the Project Site as a postwar recreational facility. A digital copy of the interpretive materials will be provided to the Department of City Planning, Office of Historic Resources and may also be made available to interested parties.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Direct Impacts

(i) Historical Resources on the Project Site

In 2021, the Project Site was designated a Historic-Cultural Monument under the name Studio City Golf and Tennis Club. According to the designation as adopted by the City Council, identified character-defining features include:

- Private recreational facility open for public use
- Clubhouse
- Golf ball [-shaped] light standards
- Putting green

- Brick wall with weeping mortar surrounding the front lawn at the northeast edge of the property⁶³

The City of Los Angeles Cultural Heritage Ordinance requires compliance with the Secretary of the Interior's Standards for Rehabilitation for properties that are designated HCMs (Los Angeles Administrative Code, Section 22.171.14).

As reflected in Chapter II, *Project Description*, of this Draft EIR, and in CUL-PDF-1: Rehabilitation Plan, the distinctive character-defining features of the Project Site as identified in the HCM designation would be retained. Specifically, the Project Site would remain a private recreational facility open for public use in Studio City, and the character defining features of the HCM, specifically the clubhouse, putting green, golf ball-shaped light standards, and brick wall with weeping mortar, would all be retained such that the Project Site would retain its historic integrity and continue to convey its significance as a 1950s community recreational facility. The putting green and brick wall would be retained in place in their original configuration. The golf ball-shaped light standards would be retained and relocated to the northeastern portion of the Project Site, in proximity to the clubhouse and putting green. Following their relocation on the Project Site, the golf ball-shaped light standards would remain visible from the public right-of-way and would continue to collectively convey their programmatic association with the history of the Project Site.

The clubhouse would be retained, adaptively re-used as a visitors' center, and rehabilitated according to the Standards, as required by the City of Los Angeles Cultural Heritage Ordinance for properties that are designated Historic-Cultural Monuments (Los Angeles Administrative Code, Section 22.171.14). The Project would maintain the significant characteristics of the clubhouse's original Ranch-style architecture, and the historic relationship of the building with the overall Project Site and the surrounding neighborhood. This includes retaining the clubhouse in its historic location and maintaining the significant features of the clubhouse that have collectively served as the public face of the Project Site since the 1950s, including: the clubhouse's angled position facing Whitsett Avenue and Valley Spring Lane; the existing setback; the relationship of the clubhouse, the putting green, and the low brick wall; and the mature trees in this portion of the Project Site. The clubhouse, golf ball-shaped light standards, putting green, and brick wall comprise the primary features of the Project Site that have historically been visible from the public right-of-way. The Project Site would therefore retain much of its historic outward appearance. The Project Site would maintain the same relationship with the surrounding neighborhood as it did historically when it was established as a recreational facility to serve the growing population in the San Fernando Valley after World War II.

⁶³ Studio City Golf and Tennis Club Historic-Cultural Monument Application, Council File: 21-0470, Revised Findings, as modified by the PLUM Committee, September 14, 2021, adopted by City Council, September 29, 2021.

Distinctive features of the exterior of the clubhouse would be retained and rehabilitated, including its original Ranch-style plan, massing, and original architectural details as identified in the Historical Report. Deteriorated features would be repaired or replaced in-kind wherever possible. The Project is not proposing additions to the clubhouse, or alterations to the building that would obscure or remove important exterior features. On the interior, significant features as identified in the Historical Report would be retained and rehabilitated as part of the adaptive reuse of the building as a visitors' center. The clubhouse interior renovations would address deferred maintenance and improve the visitor experience. Renovation work would primarily consist of expanding restroom capacity, increasing the percentage of the building occupied by the café, establishing an interpretive display of the Property's history, and bringing the building into compliance with ADA access requirements. As detailed above in CUL-PDF-1: Rehabilitation Plan, a Rehabilitation Plan will be prepared and submitted to the Department of City Planning's OHR for review and approval as part of the Project to ensure and document Standards compliance. Therefore, after completion of the Project, the clubhouse would retain its historic appearance and important character-defining features, and all character-defining features would continue to contribute to the significance of the Project Site as a designated HCM.

The Project would demolish non-character-defining features of the Project Site, such as the golf course, driving range, tennis shack, tennis courts and associated light poles, and parking areas, and replace them with new recreational facilities, consistent with the historic use of the Project Site.

The overall effect of the Project is consistent with the historic character of the Project Site, and therefore complies with the Standards for Rehabilitation. As further described in the Historical Report, provided in Appendix E-1, of this Draft EIR, use of the Project Site for athletic and recreational purposes is consistent with its historic use; the historic character of the Project Site overall would be retained; the identified character-defining features would be retained and rehabilitated; and the proposed new construction would not destroy historic materials, features, and spatial relationships that characterize the Project Site. Accordingly, the Project would not result in a substantial adverse change in the significance of a historical resource, the Project Site would retain all of the identified character-defining features and will retain sufficient historic integrity to remain eligible as an HCM, and the Project would not have a significant impact on the environment as defined by CEQA.

Therefore, the Project would not result in a substantial adverse change in the significance of a historical resource, as defined in CEQA Guidelines Section 15064.5. Accordingly, the Project would have a less than significant impact on historical resources.

(b) *Indirect Impacts*

(i) *Historical Resources in the Vicinity of the Project Site*

As previously indicated, there are nine HCMs and forty-three potentially eligible historical resources located within a one mile radius of the Project Site, including both potential individual historical resources and potential historic districts. However, none of these historic resources are located immediately adjacent to the Project Site. Moreover, there is only one identified potential historical resource within close visual proximity to the Project Site—the Thirty-Sixth Church of Christ Scientist as located at 4052 N. Whitsett—which is located across the street from the Project Site to the south. Although the Project Site is visible from both the public right-of-way and the Thirty-Six Church of Christ Scientist, the character defining features that convey the historic significance of the Project Site as a HCM would all be retained under the Project, including the clubhouse, putting green with brick wall, and golf ball-shaped light standards, and, the Project Site would continue to be a private recreational facility open for public use. Furthermore, due to the distance between the Project and the Thirty-Six Church of Christ Scientist, the Project would not create significant shadows or other indirectly impacts due to visual proximity. Therefore, at the conclusion of the Project, there would be no impact to the setting of the one potential historical resource within close visual proximity to the Project Site. It would remain intact and retain all of the aspects of its integrity, including its setting, so that its eligibility as a potential historical resource would be unimpaired. Accordingly, as the Project would not affect the eligibility of historical resources in the vicinity for listing at the federal, State, or local levels, and indirect impacts on off-site historical resources would be less than significant.

Therefore, indirect impacts to historical resources in the vicinity of the Project Site would be less than significant, as the Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

(2) *Mitigation Measures*

As described above, the Project would retain its significance as a 1950s community recreational facility, all of the identified character-defining features of the HCM, Studio City Golf and Tennis Club, and it includes Project Design Features to ensure the significance of the HCM is retained, specifically PDF-CUL-1, Rehabilitation Plan, PDF-CUL-2, Documentation, and PDF-CUL-3, Interpretation. Accordingly, impacts on an historical resource as defined in CEQA Guidelines Section 15064.5 were determined to be less than significant. Therefore, no mitigation measures are required.

(3) *Level of Significance After Mitigation*

Impacts on historical resources were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As a result of the archival research and archaeological resources survey conducted for the Project, no archaeological resources have been identified within or immediately adjacent to the Project Site. The geoarchaeological review indicates the Project Site is mapped at surface as containing Holocene-age alluvium, which encompasses the entirety of the region's human occupation and therefore has the potential to contain subsurface archaeological deposits. Should intact subsurface archaeological deposits be present within the Project Site, they would likely be found within the C-horizon beyond depths of 2-7 feet, which is the depth of fill material. Project-related ground disturbance would extend to depths of 21 feet, beyond the depths of fill and into the C-horizon where subsurface archaeological resources may be present.

Although there is the potential to encounter archaeological resources on the Project Site, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should such resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the discovery so the find can be evaluated. An archaeologist would then assess the discovered material(s) and prepare a report summarizing the methods and results of resources, treatment, and evaluation. Harvard-Westlake School would then comply with the recommendations of the evaluating archaeologist, and a copy of the report would 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. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

Therefore, while development of the Project Site has potential to encounter buried archaeological resources, with implementation of the City's standard condition of approval to address inadvertent discovery of archaeological resources, there would not be a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding archaeological resources were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding archaeological resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner would contact the Native American Heritage Commission who would identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98.

Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant.

(2) Mitigation Measures

Impacts regarding human remains would be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding 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

(1) Impact Analysis

(a) Historical Resources

A significant cumulative impact associated with the Project and related projects would occur if the impact would render a historical resource or district as no longer eligible for listing, and the Project's contribution to the impact would be cumulatively considerable. Related projects that have the potential to result in combined or cumulative impacts in association with the impacts of the Project are identified in Chapter III, *Environmental Setting*, which includes Table III-1, *Related Projects List*, and Figure III-1, *Related Projects Map*, which shows the locations of each of the related projects listed in Table III-1. In assessing cumulative impacts on historical resources, the focus is on related projects that are located in the immediate vicinity of the Project that have the potential to contribute to changes in the setting of identified historical resources on the Project Site and in the vicinity, including historic districts. These related projects include:

- Related Project No. 1, the Sportsmen's Lodge, replacement of the event/banquet facility with a shopping center, including a gym and retail, at 12833 Ventura Boulevard as located on the northeast corner of Coldwater Canyon Avenue and Ventura Boulevard and to the southwest of the Project Site
- Related Project No. 2, a new development involving a mix of retail, apartments and other uses located at 12458 Ventura Boulevard on the southeast corner of Ventura Boulevard and Laurel Terrace Drive just southeast of the Project Site;
- Related Project No. 3, a new development located at 12582 Ventura Boulevard as located on the south side of the street and just south of the Project Site;
- Related Project No. 4, a new development located at 12544 Ventura Boulevard as located on the south side of the street and just south of the Project Site;
- Related Project No. 5, the Sportsmen's Lodge, an addition of apartments and restaurant uses to the existing hotel at 12833 Ventura Boulevard as located on the northeast corner of Coldwater Canyon Avenue and Ventura Boulevard and to the southwest of the Project Site.

According to SurveyLA, two of the related projects (No. 1 and No. 5) involve a property that was previously identified as a potential historical resource, the Sportsmen's Lodge located at 12833 Ventura Boulevard. The property was evaluated as part of SurveyLA in 2013; at that time, it was assigned the three status codes of 3S, 3CS, and 5S3, indicating that the Sportsmen's Lodge property appeared eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a local Historic-Cultural Monument based on the SurveyLA evaluation. However, subsequently, a year later in 2014, PCR Services Corporation prepared an Historic Resources Assessment for

the Sportsmen’s Lodge property.⁶⁴ At that time, the Sportsmen’s Lodge was found to lack “integrity to exemplify historical or architectural significance during its 1940 to 1970 period of significance for individual listing or as a contributor to a district under any of the applicable federal, state or local eligibility criteria. Furthermore, because it is a highly altered example of a recreational fishing site and restaurant, it was found that the Sportsmen’s Lodge does not appear eligible for listing in the national, state or local registers as an exceptional, distinctive, outstanding, or singular example of its type or style. Therefore, the Sportsmen’s Lodge was assigned a California Historic Resources Status Code of 6Z, which means that it was “found ineligible for the National Register, California Register, or Local designation through survey evaluation.” As the Sportsmen’s Lodge located at 12833 Ventura Boulevard is not considered an historical resource, and none of the other related projects involve historical resources, the related projects would not contribute to cumulative impacts. Furthermore, the Project would retain all of the character-defining features that convey the significance of Studio City Golf and Tennis Club as an HCM, and no direct impacts on historic resources would occur. And, as previously indicated, the Project would not have indirect impacts on historical resources. There are no resources located adjacent to the Project Site, and as previously discussed, the one potential historical resource in close visual proximity to the Project Site—the Thirty-Sixth Church of Christ Scientist as located at 4052 N. Whitsett Avenue, across the street from the Project Site to the south—would remain intact and retain all of its aspects of integrity at the conclusion of the Project, including its setting. This is due to the fact that the Project Site, with which it shares close visual proximity would retain its open, park-like setting, its significance as a 1950s community recreational facility, as well as the character-defining features visible from the public right-of-way, such as the clubhouse, the putting green, the golf ball-shaped light standards and the brick retaining wall. Therefore, the effects on the eligibility of the potential historical resource would be negligible.

Based on the above, cumulative impacts on historical resources would be less than significant.

(b) Archaeological Resources and Human Remains

Impacts related to archaeological resources qualifying as historical resources or unique archaeological resources under CEQA are in most cases site-specific because they occur on a project level as a result of a project’s ground disturbance activities during construction and, as such, are assessed on a project-by-project basis. Many of the related projects within the study area would require excavation that could potentially expose or damage archaeological resources. However, the related projects are also located in highly developed urban areas with sites that have been previously disturbed that are on separate sites not adjacent to the Project Site. The potential of such related projects to encounter and cause, in conjunction with the Project, a significant cumulative impact on

⁶⁴ Wuellner, Margarita, et al. Historical Resources Assessment Report: Sportsmen’s Lodge, 12823 Ventura Boulevard, Studio City, California, prepared by PCR Services Corporation for Weintraub Real Estate Group, October 2014.

archaeological resources is limited. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, if archaeological resources are encountered, the City's standard condition of approval would be implemented to address inadvertent discovery of archaeological resources, or where known archaeological sites could be encountered, mitigation measures, including avoidance and preservation in place or other treatment, would be required.

Additionally, the potential for related projects to cause a significant impact with respect to human remains is low, but if human remains are encountered, compliance with State law would ensure that any such impacts would be reduced to a less-than-significant level. As a result of State law compliance, cumulative impacts with respect to human remains for the Project would also be less than significant.

With implementation of the City's standard condition of approval and compliance to applicable State law regarding human remains discovery, cumulative impacts on archaeological resources and human remains associated with related projects and the Project would be less-than-significant.

(2) Mitigation Measures

Cumulative impacts to historical resources, archaeological resources, and human remains were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts to historic resources, archaeological resources and 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.

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