

# IV. Environmental Impact Analysis

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## 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 (National Register), 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 F of this Draft EIR, which includes the Historical Resources Technical Report—Radford Studio Center Project (Historical Resources Report) prepared by Historic Resources Group (HRG; Appendix F.1), and the Archaeological Resources Assessment for the Radford Studio Center Project (Archaeological Resources Assessment; Appendix F.2) prepared by Statistical Research, Inc., respectively.<sup>1,2</sup>

### 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:

- National Historic Preservation Act of 1966, as amended

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<sup>1</sup> HRG, *Historical Resources Technical Report—Radford Studio Center Project*, January 2025.

<sup>2</sup> Statistical Research, Inc., *Archaeological Resources Assessment for the Radford Studio Center Project, Studio City, California*, January 2025.

- Secretary of the Interior’s Standards for the Treatment of Historic Properties
- Native American Graves Protection and Repatriation Act
- Archaeological Resources Protection Act
- Archaeological Data Preservation Act
- 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 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.”<sup>3</sup> 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 (three 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.<sup>4</sup>

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<sup>3</sup> 36 Code of Federal Regulations (CFR) 60.

<sup>4</sup> U.S. Department of the Interior, National Park Service, *National Historic Landmarks, Frequently Asked Questions*, [www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm](http://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm), accessed January 10, 2025.

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.”<sup>5</sup>

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

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

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.

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

<sup>6</sup> U.S. Department of the Interior, *National Register Bulletin #21: Defining Boundaries for National Register Properties Form*, 1997, p. 12.

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*(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:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.<sup>7</sup>

*(ii) Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historical 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.”<sup>8</sup> 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.”<sup>9</sup> The National Register recognizes seven qualities that, in various combinations, define integrity.

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

<sup>8</sup> U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, pp. 7 and 8.

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

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.<sup>10</sup> 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.<sup>11</sup> The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no 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

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

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

- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own 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 for the Treatment of Historic Properties*

The National Park Service issued the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) with accompanying guidelines for four types of treatments for historic resources: preservation, rehabilitation, restoration, and reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Standards. 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 Standards for Rehabilitation provide relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
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.<sup>12</sup>

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

*(c) Native American Graves Protection and Repatriation Act*

The Native American Graves Protection and Repatriation Act requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.<sup>13</sup>

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

<sup>13</sup> *United States Department of the Interior, National Park Service, Native American Graves Protection and Repatriation Act, 1990.*

*(d) Archaeological Resources Protection Act*

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

*(e) Archaeological Data Preservation Act*

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

**(2) State**

*(a) California Environmental Quality Act*

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

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

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<sup>14</sup> *United States Department of the Interior, National Park Service, Technical Brief #20: Archeological Damage Assessment: Legal Basis and Methods, 2007.*



If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site 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.<sup>15</sup> 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 resource nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.<sup>16</sup>

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.”<sup>17</sup> 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:

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<sup>15</sup> *California Public Resources Code Section 21083.1(a).*

<sup>16</sup> *CEQA Guidelines Section 15064.5(c)(4).*

<sup>17</sup> *CEQA Guidelines Section 15064.5(b)(1).*

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) 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.<sup>18</sup>

*(b) California Register of Historical Resources*

The California Register is “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”<sup>19</sup> 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.<sup>20</sup> 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 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

<sup>18</sup> CEQA Guidelines Section 15064.5(b)(3).

<sup>19</sup> California Public Resources Code Section 5024.1[a].

<sup>20</sup> California Public Resources Code Section 5024.1[b].

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 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 that 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.<sup>21</sup>

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

1. Historic-Cultural Monument (HCM); and

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<sup>21</sup> *City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.*

## 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 Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area, which includes the following goal and associated policies with respect to cultural resources:

*Goal 16: Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.*

Objective 16-1: To ensure that the community's historically significant resources are protected, preserved, and/or enhanced.

Policy 16-1.1: Encourage the preservation, maintenance, enhancement, and reuse of existing historically significant buildings and the restoration of original facades.

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 as follows:

- 1) 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;
- 2) The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
- 3) 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.<sup>22</sup>

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 the Department of City Planning's Office of Historic Resources (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?

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<sup>22</sup> *City of Los Angeles, Los Angeles Administrative Code Section 22.171.7.*

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 and California Registers are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, LAMC Section 91.106.4.5 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.”<sup>23</sup>

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

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (HPOZs) in 1979; 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.<sup>24</sup> 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.<sup>25</sup> For CEQA purposes, contributing elements are treated as contributing features to a historic district, which is the historical resource. Non-contributing

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<sup>23</sup> *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

<sup>24</sup> *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

<sup>25</sup> *City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.*

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.

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

The City of Los Angeles Historic Resources Survey (SurveyLA) is a citywide survey that identifies and documents potentially significant historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's 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.

The 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 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 Register are separate processes that include property owner notification and public hearings.

## **b. Existing Conditions**

### **(1) Historical Resources**

#### *(a) Project Site*

As detailed in the Historical Resources Report, the Radford Studio Center originally opened in 1928 as one of the first studios in the San Fernando Valley. The first phase of development for the Radford Studio Center corresponded with the initial purchase and construction of the Mack Sennett Studio in 1927. Filmmaker Mack Sennett created the original nexus of the studio, which was situated in the southwestern area of the Project Site, on a portion of the South Lot. The Mack Sennett Studio continued to occupy the Project Site until 1935. Nine existing buildings, all constructed in 1928, would be retained as part of the Project.

The second phase of development occurred from 1935 to mid-1950s. During this phase, the property was owned by Republic Pictures.<sup>26</sup> This development generally expanded into the northern and eastern portions of the South Lot, with some infill between the earlier Sennett-era buildings. There are 15 existing buildings remaining on the Project Site from this phase of development which were constructed from 1935 to 1941 and again from 1944 to 1957.

The third phase of development occurred after CBS began renting the property in 1963 and purchased it in 1967. This resulted in the expansion of the studio with the construction of additional sound stage and support buildings on the outer perimeter of the Project Site, extending north towards the Los Angeles River. There are nine existing buildings remaining on the Project Site from this phase of development which were constructed from 1963 to 1969.

A fourth phase of development occurred with the construction of nine buildings from 1996 to 2005, mostly situated north of the Los Angeles River. In addition, there are four buildings which were individually built between development programs in 1979, 1988, 1992, and 2014.

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<sup>26</sup> *The property was initially purchased by Mascot Pictures in 1935, but within a matter of months, Mascot Pictures was consolidated with five other motion picture companies to create Republic Pictures.*

As of 2023, the Project Site contained 52 permanent buildings/structures, a backlot with 22 modular and/or prefabricated bungalows, various internal roads, basecamps, and outdoor areas. Existing buildings and features, their common/current names, names at the time of development, associated architects, contractors, and engineers, owners at the time of construction, and alteration histories are summarized in Table 1 of the Historical Resources Report.

As discussed in the Historical Resources Report, no buildings, structures, objects, or sites located on the Project Site have been listed or designated as historical resources, or previously identified as historical resources through survey evaluation. In addition, as detailed in the Historical Resources Report, most buildings located at Radford Studio Center are vernacular industrial buildings and not representative of any particular architectural style or associated with notable architects. One exception is the executive office building (present-day Administration Building) constructed in 1969. It was designed by noted architect Daniel L. Dworsky in the Brutalist style of architecture. Information on this style and architect is included in detail in the Historical Resources Report.

In 2013, SurveyLA identified the former CBS Studio Center (the South Lot of the current Project Site) as eligible for listing in the National Register and the California Register and for local designation as an HCM. Field observation for SurveyLA was limited to the public right-of-way, and, as such, an intensive survey of the Project Site was not conducted, and the integrity of individual buildings was not analyzed. Therefore, specific buildings, structures, objects, and sites that are potentially eligible for historic listing were not identified.

### *(b) Surrounding Uses*

As detailed above, the Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area and in the Studio City neighborhood in the City of Los Angeles.

As discussed in the Historical Resources Report, no buildings, structures, objects, or sites located in the vicinity of the Project Site have been listed or designated as historical resources, or previously identified as historical resources through survey evaluation including SurveyLA. In addition, no historically significant buildings, structures, objects, or sites located in the vicinity of the Project Site were identified during the field survey. Additional information and context for the surrounding is included in the Historic Resources Report.

## (2) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. As discussed in the Archaeological Resources Assessment the Project Site lies generally along the southern margin of the San Fernando Valley at the northern base of

the Santa Monica Mountains. The Project Site lies near a strategic point in the San Fernando Valley where Cahuenga Pass opens into the valley and meets the confluence of the Los Angeles River and one of its main channels, the Tujunga Wash. Historically, this pass was one of three major routes between the Los Angeles Basin to the south and the San Fernando Valley to the north.

Although little surface water is evident in the Tujunga Wash channels today, considerable surface water was available at least on a seasonal basis during the historical period.<sup>27</sup> Recent archaeological investigations in Southern California have shown that prehistoric settlement patterns in the region were heavily influenced by the unpredictable nature of large flood events along the Los Angeles River. The models that have been developed clearly demonstrate that human populations were cognizant of flood dangers and positioned their villages in elevated locations overlooking water sources to reduce the associated risk. The alluvial fan forming the Project Site is one such location. Early historical period occupation, however, appears to have been concentrated in lower-lying areas between Cahuenga Pass and the confluence of the Los Angeles River with the central branch of the Tujunga Wash.

With regard to the geologic environment, the Project Site is broadly located south of the Verdugo fault on marine and non-marine sedimentary bedrock. Generally, soil deposits in the Project Site date to the Pleistocene–Holocene and include alluvial, lake, playa, and terrace deposits with unconsolidated and semi-consolidated soils. The Project Site is predominantly composed of alluvial-fan deposits with a small incursion of floodplain sediments. These soils are composed of fine loam, clay, and sand and date to the Holocene and late Pleistocene.

### **c. Historical Background**

The Historical Resources Report, included in Appendix F.1 of this Draft EIR, includes a detailed description of the historical background and context of the Project Site and surrounding area. Below is a summary of the discussion included in the Historical Resources Report.

#### **(1) Project Site Development**

The Project Site, currently known as Radford Studio Center, remained largely rural and agricultural into the early-20th century, and was used briefly as a lettuce patch. In 1927, businessman Harry H. Merrick formed the Central Motion Picture District, Inc. to establish large studio tracts, build towns, and subdivide property in the San Fernando Valley. Mack

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<sup>27</sup> *This historical period begins at the time of Spanish colonization and the founding of Mission San Gabriel in A.D. 1771.*

Sennett purchased a 20-acre land holding along Radford Avenue (the southern portion of the present-day South Lot) in the new community to develop as a studio in the newly established Studio City neighborhood. Los Angeles architect Harold Cross designed the studio complex, and the Austin Company of California began construction of buildings on the Project Site in November 1927, with was originally known as Mack Sennet Studios. Studio buildings included two large stages, a main administration building, and a handful of smaller buildings which served as pre-production facilities, post-production facilities, studio services, and utility/storage spaces.

The first building completed on the Project Site, which was later demolished on an unknown date, was a one-story reinforced concrete generator building. The main administration building (Mack Sennett Building)<sup>28</sup> was completed shortly thereafter and described as a two-story building with three balconies designed in a “Spanish-Mexican style.” Building plans identify that the Mack Sennett Building had an entrance lobby, several offices, and vault on the first floor. A separate wing had Mack Sennett’s office, complete with a fireplace and stone hearth, marble-clad steam room, and a plunge pool.

Two sound stages were completed several months after the Mack Sennett Building was constructed. The two stages (present-day Stages 9 and 10) were constructed with wood frames, concrete walls and floating floors, stucco exteriors, and bow-truss roofs. Each stage building housed four interior stages and could accommodate several productions shooting simultaneously. At the time of their construction, the stages were reported to be the first of their kind and two of the “largest stages in the film industry.” The new studio also had a large back lot that could be used for outdoor scenes.

The original studio was officially completed in April 1928, and officially opened for business on May 1, 1928. Mack Sennett occupied the buildings on the Project Site for four years. Existing buildings from this period were all built in 1928 and include the Mack Sennett Building, property and wardrobe building (Art/HR Building), camera building (Telco Building), mill/prop storage building (Sound and MIS Building), garage (Building T), two stages (Stages 9 and 10), generator room (Medical), and laboratory building (Building 3).

In 1935, Mascot Pictures purchased the Mack Sennett property. Although permits were obtained to construct a new sound stage, within a matter of months, Mascot Pictures was consolidated with five other motion picture companies to create Republic

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<sup>28</sup> *The present day Mack Sennett Building constructed in 1928 was originally referred to as the Administration Building. The present Administration Building constructed in 1969 was originally referred to as the Executive Office Building.*

Pictures. No buildings from this period of development by Mascot Pictures are still present on the studio lot.

Republic Pictures leased the studio for four years after acquiring Mascot Pictures. During this period, the company built a single building for post-production needs (Building S). Between 1939 and 1941, over a half dozen buildings were constructed to accommodate increasing film production. These included an office wing at the southeast end of the Mack Sennett Building, a scene dock (Set Lighting/Mill Building Annex), a carpentry mill (Mill/Paint/FX Shop), a stage (Stage 2), a restaurant (Commissary), a storage shed (Mill Annex), a film vault (no longer existing), a projection room (no longer existing), and a two-story addition to the rear of the administration building (Building 4).

An additional sound stage (Stage 3) and a motor generator building (Generator Building) were constructed in 1945 as expansions to the present-day Ralston Building. Academy records show that the Republic scoring stage was one of only three buildings to ever have been presented an Academy Award. The Republic Studio scoring stage was eventually the site of the recording of dozens of film scores. In total, Republic's Music Department garnered 25 Academy Awards—more than any other department in the studio.

Republic Studios' expansion program took several years to complete. In the early- to mid-1950s, Republic built several stages (Stage 4/5 and Stage 11/12), offices (Edit 1, Building 1, and Building 2), and a warehouse (Grip/Canvas Department). The back lot area in the northeastern portion of the property was also expanded with additional sets depicting streetscapes and natural environments for outdoor filming.

Concurrent public works efforts to control the Los Angeles River and its tributaries also transformed the studio property where the river bordered and bisected the studio property. Destructive flooding throughout Los Angeles in 1914, 1934, and 1938 spurred a massive flood control project involving concrete channelization of the entire Los Angeles River under the auspices of the U.S. Army Corps of Engineers (USACE). By the late 1940s, the natural riverbanks and flood plain that characterized much of the studio property had been subsumed beneath concrete.

Republic ended motion picture production at the studio in 1958. The company was renamed the Republic Corporation and continued to expand the studio site. A scene dock (Set Lighting) was built in 1963 and a stage (Stage 15) was completed in 1964.

Starting in 1963, CBS began renting the studio from Republic and the facility was renamed CBS Studio Center. CBS constructed Stage 15 and Stage 14 and the Radford Gate House while renting the site. In 1967, CBS purchased the studio. Over the next two years, CBS constructed two additional stages (Stage 16 and Stage 17), a second entrance

gate house (Colfax Gate House), an editing office (Edit 2), and a new executive office building (Administration Building). After this development in the late 1960s, the studio was not expanded for some time, with only a single office (Building 5) built in 1979 and a stage (Stage 18/19/20) completed in 1988. CBS Studio Center was briefly known as “CBS/Fox Studios from 1982 to 1983 and as “CBS/MTM Studios from 1984 to 1992, at which point, it became known as CBS Studio Center again until 2021, when it has been known as Radford Studio Center since.

In 1992, CBS built an office and dressing room (Building 7). Jim’s Green House and Tucker House—office buildings styled for use as sets—and a two-story gabled roof office building (Republic Building) were also constructed around this time. Over 20 multi-purpose rooms and bungalows were also constructed. Buildings completed between 1996 and 2000 include three stages (Stages 21/22/23), an office and dressing rooms (Building 8, Norvet Building, Roy Rogers/Dale Evans, and Annex 7), and a parking garage (Sater Parking). In 2005, several more buildings were completed, including the Broadcast Center and a parking garage (North Lot Parking Structure). In 2014, the “lagoon” set, used since the late 1960s for numerous productions including Gilligan’s Island, was removed and replaced with an employee parking lot and a production office building.

## (2) Development of Studio City

The Los Angeles neighborhood of Studio City is situated in the southern region of the San Fernando Valley. During the 1880s real estate boom, the land was subdivided and 12,000 acres extending from approximately Whitsett Avenue in western Studio City to the Burbank city line were sold to form the community of Toluca, later known as Lankershim.

The area remained mostly agricultural through the remainder of the 19th century. Changes in infrastructure, transportation, and industrial development, however, began to alter the rural character of the region in the early-20th century. Strong transportation connections with urban Los Angeles to the south were established with the arrival of the Pacific Electric Streetcar and a secure water source. Two years later, Valley residents voted in favor of annexation with the City of Los Angeles. By the 1920s, large areas of San Fernando Valley ranch and farmland were platted and prepared for residential settlement and commercial development.

The catalyst for widespread development of Studio City was the arrival of the entertainment industry in the 1920s. The Central Motion Picture District, Inc. was largely responsible for ushering in this industry. The Central Motion Picture District purchased 503 acres of land on Ventura Boulevard in North Hollywood as the site for a new motion picture-focused “Studio City” district. In addition to motion picture studio development, the Central Motion Picture District sought to incentivize broader economic growth and residential development in the area. Residential and commercial tracts were subdivided for

development, including areas along Agnes Avenue and a portion of the commercial area now known as Tujunga Village (both subdivided in 1927). This coincided with road improvements, including the widening of Ventura Boulevard.

With the establishment of Mack Sennett Studios in 1927, development of the adjacent Laurel Terrace neighborhood, which was one of Studio City's earliest neighborhoods, accelerated significantly in the late 1920s. 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. Due to the area's exponential growth and unprecedented demand for housing, agricultural land was quickly converted into residential subdivisions. The 1950s and 1960s brought new subdivisions and an increase in new construction throughout the Valley, 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.

#### **d. Los Angeles Citywide Historic Context Statement Applicable Historic Contexts and Themes**

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historic 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 Los Angeles HCM eligibility criteria.

The HCS is organized into nine broad historical contexts, which are specific to Los Angeles and focus on the development of the City during the period dating from 1780 to 1980, and further subdivided into themes and sub-themes that reflect the various historical trends and patterns of events associated with each context. HCS contexts and themes relevant to the evaluation of the Project Site are identified below.

### (1) Association with the Motion Picture Industry

The Project Site was originally developed for use as a motion picture studio in the late 1920s and was expanded for continued use as a motion picture studio through the mid-1950s. The motion picture companies that owned the studio during this period (Mack Sennett, Mascot Pictures, and Republic Pictures) were independent studios during the Major Studio Era and were not one of the “Big Eight” studios. Potential historical resources on the Project Site associated with the history of the motion picture industry are evaluated for historic significance under the Entertainment Industry, 1908–1980 context; the Industrial Properties Associated with the Entertainment Industry, 1908–1980 theme; and Motion Picture Industry: Independent Studios and Rental Plants, 1919–1980 sub-theme provided in the HCS.

### (2) Association with the Television Broadcasting Industry

After Republic Pictures ceased motion picture production on the Project Site in the late 1950s, facilities were leased to other production companies, primarily focused on production for television. In 1963, CBS rented the former Republic Studios site and renamed it “CBS Studio Center.” CBS purchased the studio outright in 1967 where they continued to produce programming for broadcast on CBS while also leasing facilities to other production companies. Ownership of the studio by CBS continued until 2021. Potential historical resources on the Project Site associated with the history of the television broadcasting industry are evaluated for historic significance under the Entertainment Industry, 1908–1980 context; the Industrial Properties Associated with the Entertainment Industry, 1908–1980 theme; and Television Broadcasting Industry, 1931–1980 sub-theme provided in the HCS.

### (3) Architectural Significance

As is typical of many entertainment industry studio properties dating from the first half of the 20th century, the buildings and structures located on the Project Site are utilitarian in nature, conceived with function as the primary driver of their design. As such, buildings located on the Project Site are generally not architecturally distinguished. One exception to this is the Administration Building designed in the Brutalist architectural style. As such, the Administration Building is evaluated for historic significance under the Architecture and Engineering, 1850–1980 context; L.A. Modernism, 1919–1980 sub-context; Late Modern, 1966–1990 theme; and Brutalism sub-theme provided in the HCS.

### (4) Social Significance

The Project Site was the headquarter location for MTM Enterprises from 1971 to 1988 and its production of The Mary Tyler Moore Show from 1970 to 1977. The Project Site is evaluated for historic significance under the Women’s Rights in Los Angeles, 1850–1980



context and under the Entertainment, Media, Newspapers, and Publishing theme provided in the HCS.

## e. Historical Resources Evaluation

Individual buildings, structures, and site features of the Project Site are examined below for the purposes of identifying potential historical resources.

### (1) Associations with the Motion Picture Industry

#### *(a) Consideration as a Historic District*

The buildings and features at Radford Studio Center have been considered collectively under the Motion Picture Industry: Independent Studios and Rental Plants sub-theme for their potential eligibility for listing in the National Register, the California Register, and/or listing as a Los Angeles HCM.

The National Park Service defines “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development” as a historic district. The National Park Service also lists “industrial complex” as a potential example of a district.<sup>29</sup> Because the Project Site contains a grouping of related buildings and structures and was constructed as an industrial complex for the production of motion pictures, consideration of the property as a historic district is the appropriate analytical framework for its evaluation.

#### *(i) Historic Significance*

The Radford Studio Center property contains a grouping of buildings and structures that may be significant under Criterion A/1/1<sup>30</sup> for its association with the development of the motion picture industry in the United States and the concentration of the industry’s production facilities in Southern California. The Project Site is important as an early independent film studio developed by Mack Sennett in the San Fernando Valley and its establishment of the Studio City area as a center for motion picture production.

The first period of significance for the Project Site corresponds with the initial development of the Mack Sennet Studios by Mack Sennett from 1928 to 1933, when Mack

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<sup>29</sup> *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997.*

<sup>30</sup> *Since the eligibility criteria for local HCM designation align in large degree with the eligibility criteria of the National Register and the California Register, the following evaluation considers eligibility under each of the criteria at the federal, state, and local levels under a single heading.*

Sennett fell into bankruptcy and the studio briefly closed. Nevertheless, the Project Site is significant for its role as an early independent motion picture studio that was built to accommodate the newest technologies—primarily technical innovations related to recording needs as silent films were overtaken by “talking pictures.” This timeframe includes the initial establishment of the motion picture production facility in the San Fernando Valley by Mack Sennett. Contributing buildings include representative property types that are typical of early motion picture studios and significant for early technology of the period. Buildings from this period were historically used as administration buildings, property and wardrobe, camera buildings, prop storage facilities, and stages, among other uses. Buildings constructed during this period remain in their original locations, retaining spatial relationships that have continued relatively unchanged since the late 1920s. The integrity of the individual buildings is varied.

The Project Site also played a critical role in the development of the San Fernando Valley as a new center for motion picture studio production, in response to the dispersion of motion picture studios from central Los Angeles and Edendale.<sup>31</sup> Development of the Mack Sennett Studio helped establish the area as a new location for motion picture studios and provided the basis for its name, “Studio City.” Establishment of the Mack Sennett Studio also provided a catalyst for new residential and commercial development in the new community. Following Mack Sennett’s bankruptcy, the Project Site was briefly operated by Mascot Pictures before Mascot was subsumed by Republic Pictures in the 1930s.

There are nine existing buildings that fall within the boundaries established for the Mack Sennett period of significance, and there is one building that was constructed outside the period of significance that is a non-contributor. The analysis in the Historical Resources Report found that six out of ten structures date to the period of significance and retained good or fair integrity. As such, a majority of buildings date to the period of significance and retain sufficient integrity to convey their significance. The buildings that retain their integrity are generally the larger, more substantial buildings critical to defining the spatial organization and character of the site; conversely, those that do not retain integrity are generally the smaller, more ancillary buildings. For this reason, a potential historic district was identified for the Mack Sennett phase of development at the Project Site.

The second period of significance for the Project Site spans Republic Picture’s use of the space as their primary production facility for over twenty years, from 1935 until 1958. Originating as a Poverty Row B-movie producer, Republic Pictures came to be considered an important independent film company. Buildings from this period were historically used as commissaries, production spaces, mixing rooms, facility spaces, and stages, among other

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<sup>31</sup> *“Edendale” was the historical name of a Los Angeles district northeast of Downtown Los Angeles which occupied areas known today as Echo Park, Los Feliz, and Silverlake. The name “Edendale” fell out of use after World War II.*

uses. This phase of significance also includes those buildings that were completed by Mack Sennett prior to the Project Site's acquisition by Republic Pictures as Republic utilized and updated those buildings until 1958. The integrity of the individual buildings is varied. Research found that the Project Site is significant for its association with Republic Pictures from 1935, the year the film company acquired the lot, to 1958, when Republic Pictures ended its motion picture operations on the Project Site.

There are 15 buildings that fall within the boundaries established for the Republic Pictures period of significance, and there are five buildings that were constructed outside the period of significance that are non-contributors. The analysis in the Historical Resources Report found that 12 out of 29, or 41 percent, of structures date to the period of significance and have retained good or fair integrity. According to National Park Service guidance, "the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole." The majority of buildings that do not retain sufficient integrity or were constructed outside the period of significance create separation between buildings that do retain integrity, which interrupts the historic pattern of development and fragments the spatial organization of contributing buildings critical to forming a historic district. For these reasons, a potential historic district was not identified that included the Republic Pictures phase of development on the Project Site.

As provided in the Historical Resources Report, the Project Site is not associated with the lives of individuals or groups important to national, state, or local history to suggest that the Project Site is significant under Criterion B/2/2, and it is not eligible for listing as a historical resource under National Register Criterion B, California Register Criterion 2, or City of Los Angeles Criterion 2.

#### *(ii) Contributing Buildings in the Historic District*

The Radford Studio Center property contains a concentration of buildings and structures dating from the period of significance from 1928 to 1933. The majority of these buildings remain in their original locations and retain spatial relationships that have not changed since the late 1920s. The Radford Studio Center property is composed of 49 permanent buildings, of which six buildings have been identified as contributors to the potential Mack Sennett Historic District. Four buildings are considered to be non-contributing resources due to extensive alterations or construction outside the period of significance. The remaining buildings are not located within the potential Historic District.

#### *(iii) Evaluation of Integrity*

The Project Site contains buildings and structures that date from the 1920s to 2010s. Buildings constructed during the two periods of significance (1928 to 1933 and 1935 to 1958)

associated with the Mack Sennett and Republic Pictures periods were individually assessed for historic integrity in order to determine which buildings would be considered contributors to a potential historic district.

Because no existing buildings constructed during the two periods of significance had been relocated, all had maintained integrity of location. Therefore, the analysis was particularly focused on integrity of design, as integrity of feeling and association are more closely associated with those buildings that have retained the physical characteristics of their respective periods of significance. Considerations used to evaluate integrity of design included retention of massing, form/volume, roofline, original openings, cladding, and architectural details, among others.

An assessment of historic integrity for each potential contributing building on the Project Site was completed using a rating system of very good, good, fair, and poor. Refer to Table 2 of the Historical Resources Report for an assessment of historic integrity for each building on the Project Site. In addition, refer to Appendix D of the Historical Resources Report for a summary of the integrity analysis of buildings identified as potentially significant.

Analysis of the two periods of significance associated with motion picture production on the Project Site indicated that only one period of significance, the Mack Sennett period from 1928 to 1933, retained a sufficient number of contributing buildings with very good, good, or fair levels of integrity to be considered a potential historic district. A more in-depth integrity analysis addressing the seven aspects of integrity of the potential Mack Sennett era historic district is included below.

- Location: The potential historic district remains in its original location. The majority of the buildings constructed during the period of significance remain in their original locations, retaining spatial relationships and circulation patterns that remain unchanged since the late 1920s. No contributing buildings on the Project Site have been moved from their original locations. Therefore, the potential historic district retains integrity of location.
- Design: The potential historic district retains a majority of the character-defining features of its original construction and subsequent development during the period of significance. The program and plan of the studio plant has retained its original interior focus with minimal public engagement. Buildings constructed during the period of significance include representative property types that are typical of motion picture studios from the early-20th century, such as offices, sound stages, utility buildings, and support and storage facilities. Despite some alterations, a majority of the essential physical features reflecting the original design and organization of the property as a studio lot remain intact within the potential historic district. Therefore, the potential historic district retains integrity of design.

- **Setting:** The potential historic district is located on the Project Site. The wider setting outside the potential historic district has experienced extensive development. During the period of significance, buildings on the Project Site were surrounded largely by agricultural lands. The surrounding area has been extensively developed with residential and commercial uses since the late-1920s and early-1930s.

Boundaries for historic districts are selected to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects that contribute to the historic significance of the district and delineate the historic district from immediately surrounding areas of a different historic character or development pattern. These tenets can be observed within the boundaries of the potential historic district, which exclude areas of later development not associated with the period of significance. Within the district boundary, spatial relationships among contributing buildings and circulation patterns remain largely intact. In this manner, setting features associated with the historic significance of the potential historic district are necessarily included within the district boundaries. The larger setting located outside the district boundaries are not considered character-defining or important to the integrity of the potential historic district. Therefore, the potential historic district retains integrity of setting.

- **Materials:** Due to alterations to individual buildings over time, the potential historic district does not retain substantial physical evidence of original construction materials. Common alterations undertaken within the potential historic district include, but are not limited to, replacement of cladding and roofing materials, replacement of original doors and windows, selective demolitions, additions, and the alteration and/or enclosure of original door and window openings. Therefore, the potential historic district does not retain integrity of materials.
- **Workmanship:** Due to alterations to individual buildings over time, the potential historic district no longer retains substantial physical evidence of period construction techniques, including original finishes and design elements that reflect the character and identity of the potential historic district as an early-20th century motion picture studio. Therefore, the potential historic district does not retain integrity of workmanship.
- **Feeling:** The potential historic district retains a majority of the character-defining features of its original construction, including representative building types, as well as spatial relationships, circulation patterns, and interior orientations, that are typical of motion pictures studios developed during the 1920s. These essential physical features continue to convey the original aesthetic and historic sense of a motion picture studio developed during the first half of the 20th century. Despite some degree of alteration to most of the original buildings, the studio retains its original utilitarian and industrial feel and continues to convey the character of an early-20th century motion picture studio in the Los Angeles neighborhood of Studio City. Therefore, the potential historic district retains integrity of feeling.

- Association: Because the potential historic district retains integrity of location, design, and feeling, it retains sufficient integrity to convey its significance as an early-20th century independent motion picture studio. Therefore, the potential historic district retains integrity of association.

As discussed in the Historical Resources Report, properties significant under the HCS Motion Picture Industry: Independent Studios and Rental Plants, 1919–1980 sub-theme “should retain integrity of Location, Design, Feeling, and Association from the period of significance.” The potential Mack Sennett Historic District has retained integrity of location, design, setting, feeling, and association. While integrity of materials and workmanship have been somewhat compromised by alterations, the potential historic district has retained sufficient integrity to convey its historic character and significance as a motion picture studio from the late 1920s.

*(vi) Evaluation of the Potential Historic District for the National Register*

The potential Mack Sennett Historic District appears to be significant under National Register Criterion A for its association with the development of the motion picture industry in the United States. It is important as a largely intact group of resources that date from Mack Sennett’s establishment of the site as a motion picture studio during the early sound era and association with the establishment and growth of the Studio City neighborhood in Los Angeles. Contributing buildings include representative property types that are typical of early motion picture studios and significant for early technology of the period, including offices, purpose-engineered sound stages, camera and laboratory spaces for colorization, and support and storage facilities.

The potential historic district has retained integrity of location, design, setting, feeling, and association. While integrity of materials and workmanship have been compromised by alterations and additions, the potential historic district retains sufficient integrity to convey its significance.

For these reasons, the potential historic district meets the criteria for listing on the National Register.

*(vii) Evaluation of the Potential Historic District for the California Register*

The potential historic district appears to be significant under California Register Criterion 1 for its association with the development of the motion picture industry in the United States. It is important as a largely intact group of resources that date from Mack Sennett’s establishment of the site as a motion picture studio during the early sound era and association with the establishment and growth of the Studio City neighborhood. Contributing buildings include representative property types that are typical of early motion picture studios

and significant for early technology of the period, including offices, purpose-engineered sound stages, camera and laboratory spaces for colorization, and support and storage facilities.

The potential historic district has retained integrity of location, design, setting, feeling, and association. While integrity of materials and workmanship have been compromised by alterations and additions, the potential historic district retains sufficient integrity to convey its significance.

For these reasons, the potential historic district meets the criteria for listing on the California Register.

*(viii) Local Evaluation of the Potential Historic District*

The potential historic district appears to be significant under local Criterion 1 for its association with the development of the motion picture industry in the United States. It is important as a largely intact group of resources that date from Mack Sennett's establishment of the site as a motion picture studio during the early sound era and association with the establishment and growth of Studio City. Contributing buildings include representative property types that are typical of early motion picture studios and significant for early technology of the period, including offices, purpose-engineered sound stages, camera and laboratory spaces for colorization, and support and storage facilities.

The potential historic district has retained integrity of location, design, setting, feeling, and association. While integrity of materials and workmanship have been compromised by alterations and additions, the potential historic district retains sufficient integrity to convey its significance.

For these reasons, the potential historic district meets the criteria for listing as a Los Angeles HCM.

## (2) Associations with the Television Broadcasting Industry

*(a) Consideration as a Historic District*

Generally, research and investigation did not indicate that most buildings, structures, or sites located on the Project Site are collectively historically significant as a potential historic district for their association with the Television Broadcast Industry despite the Project Site's association with television production beginning in the mid-1950s and its long association with CBS beginning in 1963.

The Los Angeles Citywide HCS identified two types of properties as potentially eligible under the Television Broadcast Industry sub-theme. These include broadcasting facilities converted from other production facilities that are usually associated with television stations and facilities purpose-built for television production. The character-defining and associative features outlined in the Television Broadcast Industry sub-theme indicates that “most significant facilities were constructed during the 1940s and 1950s,” which is the initial period when television became the most popular entertainment and information media in the United States.

The majority of building types and their arrangement on the Project Site were specifically developed for motion picture production and represent a development pattern directly associated with the motion picture industry in the first half of the 20th century. As such, the historic significance of the majority of the Project Site is grounded in its motion picture industry associations. The Project Site’s use for television production came years after television had been established and filmed television programs (as opposed to the live and taped programs characteristic of television’s formative years) became the preferred method of production. With this shift, facilities designed and developed by the motion picture industry were repurposed and modified as entertainment production facilities for television. Use of the former motion picture studios for television, however, did not significantly transform or alter the existing buildings and development pattern of motion picture studio properties, as the majority of facilities already present were typical production facilities easily customizable for television use.

In this manner, use of the Project Site for television merely represents the continued use of the property for a different medium. Unlike the company’s earlier facilities, Radford Studio Center was gradually renovated and expanded over time, as was typical of studio campuses, to accommodate the evolving entertainment industry and changing demands. Other than the Administration Building, these buildings represented utilitarian infill construction within the established studio. Moreover, CBS did not implement many changes to the Project Site because it already boasted useful technological capabilities that had been introduced by Republic Pictures in the 1950s. CBS either outfitted and updated existing buildings, as needed, or constructed property types (largely stages) that were already established on the studio lot. With the exception of the Administration Building constructed in 1969, major physical interventions and changes to the Project Site initiated by CBS are not evident until the very late-20th century and early-21st century. For these reasons, the majority of built resources on the Project Site have not been identified as historically significant for their associations with the Television Broadcast Industry.

As with most longstanding film and television studios in Los Angeles, the Project Site has hosted dozens of popular and critically acclaimed television productions over the years. It would be difficult to claim, however, that individual buildings or sites are historically significant for their association with any individual production under this context. The fact that



a stage building hosted a particular television production during its run, for instance, does not mean that the stage building is historically significant simply for that reason. Popular and critically acclaimed television programs have been produced at Los Angeles studio lots for decades and most long-standing studio buildings have been associated with one or more successful television shows at some point in their history. Individual television productions occupy buildings temporarily and the stage would typically retain very little distinctive development/modification to a particular production as the sets are changed out for subsequent productions.

### (3) Individual Building Evaluations

#### (a) *Mill Building*

The Mill Building was constructed in 1940 during the Republic Pictures era. The building is a rare example of a motion picture studio mill building from the Studio Era, spanning approximately from 1920 to 1940,<sup>32</sup> significant for its association with the construction of sets and other props used during Republic Picture's tenure at the Project Site. Industrial pre-production facilities, such as mill and carpentry buildings, were often renovated or demolished as studio needs changed over time; as such, these remaining buildings from the Studio Era are a rare property type, and those that do remain have often been so altered that they lack sufficient integrity to convey their significance.

#### (i) *Integrity*

The Mill Building has been altered by a metal frame shed addition with corrugated metal siding that was constructed in 1997 along the entire southern façade of the building. The 1997 shed addition is not a contributing feature to the building. A major portion of the southern façade wall was removed to access the addition interior although original structural members, including some delineating original window openings, remain.

Other alterations include cement plaster cladding added over original plaster cladding; replacement of the exterior staircase at the northwestern end with a new staircase; removal of exterior stair and roof platform at the east end of the building, infill of the exterior loft door on the eastern facade; replacement of doors; window replacements; and other miscellaneous modifications. Despite these alterations, the Mill Building retains its original shape, volume, massing, and materials, and it retains many of its openings and original windows.

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<sup>32</sup> *"The Major Studio Era" or Hollywood's "Golden Age" refers to a time during which production, distribution, and exhibition were all integrated under single corporate entities. The Major Studio Era continued through the end of silent films and the origins of talking pictures, which was inaugurated with the 1927 release of Warner Brothers' "The Jazz Singer"—the first feature-length film to contain synchronized speaking and singing scenes.*

Overall, the Mill Building retains a level of integrity that is rare for this property type and is a good example of a studio mill building in the City of Los Angeles. Other motion picture studios dating from the Studio Era, including Universal, Fox, Sunset Gower Studios (former Columbia Studios), and Sunset Bronson Studio (former Warner Bros. Hollywood Studio), no longer have mill buildings dating from the Studio Era. A detailed evaluation of the integrity of the Mill Building using the seven aspects of integrity is included in the Historical Resources Report provided in Appendix F.1 of this Draft EIR. As determined therein, the Mill Building retains integrity of location, design, materials, workmanship, feeling, and association. Since the Mill Building has been substantially altered since 1958 with the backlot set area to the north largely removed and replaced with additional stages and support buildings beginning in the 1960s, the Mill Building does not retain integrity of setting.

*(ii) Eligibility*

The Mill Building appears eligible for listing in the National Register and California Register and for designation as a Los Angeles HCM under National Register Criteria A and C, California Register Criteria 1 and 3, and Los Angeles HCM Criteria 1 and 3 for its association with the production and growth of Republic Pictures and as a significant studio mill building property type. The building's period of significance is from 1940, the time of its construction, to 1958, when Republic Pictures closed operations at the site.

No associations with the lives of individuals or groups important to national, state, or local history were identified to suggest that the Mill Building is significant under Criteria B/2/2, and it is not eligible for listing as a historical resource under National Register Criterion B, California Register Criterion 2, or City of Los Angeles Criterion 2.

*(b) Administration Building (Executive Office Building)*

The Administration Building was commissioned by CBS as the primary administrative office building for the lot, which was acquired by the network in 1967. Designed by architect Daniel Dworsky in 1969, the Administration Building was constructed directly adjacent to Radford Avenue, making it visible from the public right-of-way. Its Brutalist architectural style, contemporary to the time of its construction, signaled a new era and introduced a new public identity for the studio lot associated with CBS. The Brutalist style of architecture was not adopted by local architects to the extent that it was in other cities, specifically on the east coast. As such, the Administration Building is a relatively rare example in the City of Los Angeles. Unlike the majority of studio lot buildings, which pre-dated CBS occupation and ownership of the studio property, the Administration Building represents the first substantial building constructed by CBS specifically for its own purposes after purchasing the lot in 1967.

The headquarters of Mary Tyler Moore (MTM) Enterprises were located in offices on the 4th floor of the 1969 Administration Building from 1971 through 1988. Originally owned

by actress Mary Tyler Moore, in partnership with Grant Tinker, MTM is recognized for its role in shaping public perceptions of feminism during the 1970s beginning with The Mary Tyler Moore Show.

*(i) Integrity*

The Administration Building has retained a high level of integrity with no substantial exterior alterations since its original construction in 1969. A full integrity analysis of the Administration Building is provided in the Historical Resources Report. As detailed therein, the Administration Building retains all seven aspects of integrity, including integrity of location, design, setting, materials, workmanship, feeling, and association.

*(ii) Eligibility*

The Administration Building is eligible for listing in the National Register and California Register and for designation as a Los Angeles HCM under Criteria A/1/1 for its association with CBS and its ownership and operation of the studio lot, as well as in the context of women's rights in Los Angeles for its direct association with MTM Enterprises. The Administration Building represents the first substantial building constructed by CBS specifically for its own purposes after purchasing the lot in 1967. Distinguished by its Brutalist architectural style contemporary to the late 1960s, the Administration Building symbolized CBS' long ownership and operation of the studio property. The building's period of significance under this context is from 1969, the year of its construction, to 1983, which is the year CBS founder William Paley retired as chairman. These years represent CBS's dominance in broadcast television as the "Tiffany Network," recognized for the quality and popularity of its programming. Additionally, MTM Enterprises had offices in the Administration Building in the 1970s and 1980s when its television productions, including The Mary Tyler Moore Show, were produced. It was also during this time that Mary Tyler Moore was an owner/partner of the company.

The Administration Building also has important associations with architecture and associations with women's rights. No associations with the lives of individuals or groups important to national, state, or local history were identified. Therefore, the Administration Building is not eligible for listing as a historical resource under National Register Criterion B, or California Register Criterion 2, or City of Los Angeles Criterion 2.

The Administration Building is eligible for listing in the National Register and California Register and for designation as a Los Angeles HCM under Criteria C/3/3 for the excellence of its Brutalist architectural design. The building's period of significance is from 1969, the year of its construction, to 1983.

(c) *Stage 2*

Constructed in 1940 by Republic Studios, Stage 2 was the shooting location for The Mary Tyler Moore Show for six of its seven seasons. The Mary Tyler Moore Show was the initial and groundbreaking production of MTM Enterprises, the namesake production company owned by actress Mary Tyler Moore in partnership with Grant Tinker. MTM Enterprises is recognized for its role in shaping public perceptions of feminism during the 1970s beginning with The Mary Tyler Moore Show.

(i) *Integrity*

Stage 2 has not been substantially altered since The Mary Tyler Moore Show ended production after completion of its eighth season in 1977. The integrity of Stage 2 is fully analyzed in the Historical Resources Report included in Appendix F.1 of this Draft EIR. As detailed therein, Stage 2 retains all seven aspects of integrity, including integrity of location, design, setting, materials, workmanship, feeling, and association.

(ii) *Eligibility*

Stage 2 is eligible for listing in the National Register and California Register and for designation as a Los Angeles HCM under Criteria A/1/1 as the shooting location for The Mary Tyler Moore Show, the initial television production of MTM Enterprises owned by actress Mary Tyler Moore in partnership with Grant Tinker. By producing a widely loved show that focused on an unmarried and independent career woman, The Mary Tyler Moore Show is recognized today for its representation of key tenets of the Women's Movement to mainstream television audiences.

## **f. Archaeological Resources**

### **(1) Archaeological Setting**

The Archaeological Resources Assessment included in Appendix F.2 of this Draft EIR includes a detailed discussion of the cultural setting of the Los Angeles Basin dating back 12,000 years. The discussion below is a summary of the Early Period (10,000 to 8,000 B.P.) through the present.

(a) *Early Period (10,000 to 8,000 B.P.)*

The Early Period begins about 10,000 B.P. during the early Holocene. By 8,000 B.P., both the coastal and inland regions of Southern California were settled. The presence of crescents, in contexts as far removed as the lakes of the Great Basin region and the coastal areas of Southern California, attest to a common technology. Crescents are enigmatic flaked-stone artifacts of various shapes that some researchers argue were used as

transverse projectile points for hunting waterfowl. Crescents date to the period of 12,000 B.P. to 8,000 B.P. The presence of marine-shell beads at inland sites and obsidian artifacts from desert sources at coastal sites indicates either that the earliest inhabitants were extremely mobile, moving from the coast to the interior deserts or that interregional exchange networks had already developed at this early time.

Prior to 8,000 B.P., the San Dieguito culture extended beyond the Transverse Ranges from the San Diego coast northward to the Mojave Desert. The ensuing period coincided with the Altithermal climatic phase, which was characterized by warmer and drier conditions that led to the desiccation of inland lakes, a reduction in resource availability in the Mojave Desert, and depopulation of the desert. This reduction in desert occupation coincided with an expansion of occupation along the Southern California coast and inland valleys and the inception of the Millingstone horizon. Millingstone complexes, such as Oak Grove, Topanga, and La Jolla, were suggested to represent a coastward movement of desert people who found the arid interior increasingly unfavorable for human occupation.

*(b) Millingstone Horizon (8,000 to 4,000 B.P.)*

The Millingstone horizon is widespread throughout Southern California and is represented by different traditions in various areas. In the vicinity of the Project Site, the early Millingstone horizon is known as the Topanga complex. As detailed in the Archaeological Resources Assessment included in Appendix F.2 of this Draft EIR, the various regional expressions of the Millingstone horizon were combined into a single tradition (i.e., the Encinitas tradition), which was defined as reflecting a well-developed, plant-collecting economy, with projectile points and faunal remains (i.e., evidence of hunting) being rare.

In contrast to the earlier periods, Millingstone horizon sites are relatively common in inland areas. The 1946 discovery of the Tank site (CA-LAN-1) in Topanga Canyon by Robert F. Heizer and Edwin M. Lemert was an important step in the study of the early occupation of the Santa Monica Mountains and San Fernando Valley. Subsequent excavations at CA-LAN-1 and its neighbor, CA-LAN-2, during the late 1940s and again at CA-LAN-2 in 1957 represented the first intensive excavations to be published on the Topanga Complex, the local manifestation of the Millingstone horizon. Subsequent excavations resulted in the identification of two phases of the Topanga complex. Topanga I was manifested in the lower of two components at the Tank site, which proved to be a stratified site with exceptionally dense artifact deposits. Cross-dating of artifacts suggested Topanga I is older than 5,000 B.P. Topanga II is dated to 5,000–3,000 B.P. and assigned to the Intermediate Period (4,000–1,500 B.P.). As with early Millingstone horizon assemblages in other areas, the flaked stone in the early component was dominated by crude, percussion-flaked scraper planes, along with scrapers, choppers, core hammer stones, and a few large projectile points. These tools were made of local fine-grained basalt, quartzite, porphyry, chalcedony,

and chert. Even more distinctive in this typical Millingstone assemblage were several thousand milling stones and manos. In contrast, bone was rare, but small amounts of shell recovered from the site indicated that the inhabitants used marine resources despite their inland location. Secondary burial is considered, often in association with rock cairns and “killed” metates (tools that had been purposefully broken or perforated), the preferred method for the disposal of the dead in this period.

After about 5,000 B.P., the arid conditions of the Altithermal waned, and an associated increase in evidence of human occupation—represented by the Pinto Basin complex—appears in the archaeological record in the Mojave Desert. In addition to the presence of cemeteries, hearths, and features composed of huge concentrations of rocks and tools, the vast quantities of artifacts at many interior Millingstone horizon sites attest to the presence of major settlements occupied for extended periods of time. As detailed in the Archaeological Resources Assessment included in Appendix F.2 of this Draft EIR, no limited-activity or special-use sites have been found dating prior to 3,500 B.P., especially in inland areas.

*(c) Intermediate Period (4,000–1,500 B.P.)*

The Intermediate Period witnessed the development of regional diversification evidenced by the emergence of two contemporary settlement and subsistence systems: a coastal system from Point Mugu to Malibu and an inland system.

The early part of the Intermediate Period in the inland region, represented by Topanga II, was found in the upper component of the Tank site and at CA-LAN-2. This phase was distinguished by moderate-sized projectile points, incised and cogged stones, and smaller numbers of the crude core tools that typified early Millingstone assemblages. Small numbers of pestles and mortars also appeared in Topanga II contexts. Further work at CA-LAN-2 suggested a later Topanga III phase, distinguished by mortars, pestles, and pressure-flaked projectile points along with the abundant milling stones and core tools typical of the period. Large, circular, rock-lined ovens and flexed burials (sometimes under stone cairns) also distinguish Topanga III. A small number of radiocarbon dates suggested an age of 3,000–2,000 B.P. for this later assemblage.

As noted in the Archaeological Resources Assessment included in Appendix F.2 of this Draft EIR, CA-LAN-167 is believed to be the ethnographic village of Tujunga, located north of the Project Site near present day Hansen Dam in the eastern San Fernando Valley. Hundreds of fragments of fire-affected stone bowls, mortars, pestles, and manos grouped into cairns, along with boulders and cobbles were discovered at this site in 1945. Other artifacts found in this area included “ceremonial” stone knives; steatite pipes, fishing weights, and beads; awls and gaming pieces of deer bone; large dart points and smaller arrowheads; shell beads and abalone shells; various pigments; and bone harpoon barbs. Among the more unusual artifacts were what were later identified as 40 sherds of a Sacaton Red-on-buff

ceramic vessel, imported from the Phoenix Basin in Arizona. Skeletal remains, including cremated and noncremated bone, were found dispersed throughout the site. Twenty-six “ceremonially killed” stone bowls containing calcined bones, later determined to be fossilized mammoth or mastodon remains were also found. The site was interpreted to be a place where remains were placed in a secondary deposit after the mourning ceremony had taken place elsewhere. It was also noted that the site was horizontally stratified; the older northern portion was associated with noncremated remains and larger projectile points, and the younger southern portion of the site contained cremated remains in stone bowls, associated with smaller arrow points.

In 1963 and 1964, it was concluded that the site was occupied for approximately 1,400 years—from circa A.D. 400 to 1,800—based on the combination of a single uncorrected charcoal date and imported ceramics from the Southwest.<sup>33</sup> The settlement was apparently abandoned when its occupants were relocated to the missions between A.D. 1797 and 1801. It was concluded that prior to their relocation, the villagers practiced a hunting-and-gathering economy based on the procurement of small game and seeds. A small quantity of marine shell from a variety of coastal habitats also was recovered. The inhabitants also seemed to have established long-distance trade with the inhabitants of the Phoenix Basin and Colorado Plateau in Arizona. The marine shell indicated contact with the California coast.

Two distinctive groups of cairns without associated occupational debris were also identified at the Cairn site, located at the foot of Santa Susana Pass on the Fried Ranch in Chatsworth. Group A consisted of one large cairn surrounded by a number of smaller cairns. The large cairn was made up almost exclusively of artifacts—metates, manos, stone bowls, pestles, and discoidals—broken into small pieces, whereas the surrounding cairns were made up of both broken artifacts and large unmodified stones. By contrast, Group B lacked this structure and contained more rock and fewer artifacts broken into large pieces, a pattern more similar to the Porter Ranch site. The Cairn site was considered to be another manifestation of the widespread mourning ceremony.

Based on evidence from the Cairn and Tujunga sites, a distinctive “precremation cairn complex” associated with burials and large projectile points developed out of the Topanga II complex in the San Fernando Valley. This complex was replaced around 1,600 B.P. by a “cremation complex” that was distinguished by human cremation, small arrowheads, bone harpoon points, and fishing weights. It was this latter complex that evolved into the historical period Gabrielino/Tongva culture.

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<sup>33</sup> *University of California, Los Angeles, Department of Anthropology, Archaeological Investigations of the Big Tujunga Site (LAN-167), Archaeological Survey Annual Report, Vol. 8, pp. 91–150.*

Intermediate Period developments have been attributed to a second wave of migration from the desert. In this case, it involved an early Shoshonean (Gabrielino/Tongva) intrusion into the Southern California coastal province. Traditionally, archaeologists have argued that Takic (Shoshonean) speakers moved out of the Great Basin and Mojave Desert toward the coast around A.D. 500. These groups settled in the Los Angeles Basin and surrounding regions, thereby driving a wedge between indigenous Hokan speakers—the Chumash to the north and the Diegueño to the south. The Takic-speaking groups brought with them a distinct cultural package, highlighted by the bow and arrow and small projectile points, cremation, and pottery.

With regard to subsistence, the Intermediate Period marked the beginning of a rapid increase in the acquisition of animal protein and acorns. Hunting and fishing increased in comparison to the previous period, for which evidence of these activities is entirely lacking. The most significant change at inland sites was an increased exploitation of marine shellfish. The hunting of land mammals also appears to have increased over time, as did the establishment of temporary collecting camps. Trade came to play a more important role as well.

Analysis of cemetery material suggests that there was a high degree of differentiation of interments and that a permanent system of ascribed status was firmly established in some areas by the end of the Intermediate Period. Others have argued that ranked society emerged only in the following Late Period.

*(d) Late Period (1,500–300 B.P.)*

In most areas of Southern California, especially along the coast, two distinct Late Period groups can be defined: (1) the Chumash in the western Santa Monica Mountains and the Santa Barbara coastal area; and (2) the Gabrielino/Tongva in the eastern Santa Monica Mountains, the San Fernando Valley, and the Los Angeles Basin. One of the major developments at the beginning of the Late Period was the arrival of Takic groups. Likely originating in the southwestern Mojave Desert, Takic groups occupied much of Southern California. Takic groups brought with them small arrow points, ceramics, and the practice of cremation burial, a cultural pattern quite different from the preceding periods.

During the Late Period, population density increased along with the size of individual population aggregates. Many of the primary food-processing activities that were originally in the domain of the villages became localized at small, temporary campsites. Rockshelters were occupied for the first time at about A.D. 1,000. Some of these temporary sites reflect specialized activities, such as exploiting deer or acorns, whereas others involved more generalized hunting-and-gathering activities.



Increased settlement diversity and complexity were also reflected in technological changes. The incidence of milling stones, mortars, and pestles decreased along with the importance of vegetal resources. Small flaked stone tools, such as projectile points, drills, and flake scrapers, became the most common tools. Cemeteries from this period are large and well-defined, containing increased amounts of sociotechnic items, such as shell beads and items made of exotic materials. Exchange between inland and coastal sites also became increasingly important during the Late Period.

The Late Period was a time when all the changes evident in the preceding periods were greatly amplified and there was a quickening pace of development. Population density, social complexity, site diversity, and the size of the interaction sphere increased markedly. Differences between villages increased as their locations became more restricted. Coastal village sites declined in number, but those that remained along the larger drainages increased in size. The size of inland villages remained the same, although they were now restricted to the better-watered areas. By A.D. 1,500, coastal and inland villages had probably reached the size of the settlements later observed by the first Spanish explorers in the region. Large coastal villages contained 200 to 400 individuals, whereas their inland counterparts had populations ranging between 40 and 60 individuals. As the number of villages decreased and their locations became more restricted, a greater diversity of temporary settlements emerged, and the resources of the entire region were used in a more intensive and systematic manner. In addition, a greater proportion of time and energy was devoted to the acquisition of seasonal, highly variable, but potentially high-yielding food resources. The primary processing activities that formerly took place in villages were now all but confined to temporary sites. Such sites could be found in almost any inland area and were highly variable in the range of activities they represented.

*(e) Protohistoric Period (ca. 300–150 B.P.)*

By 300 B.P., the archaeological cultures of the Late Period had developed into the people described by the Spanish and later ethnographers, including the Gabrielino/Tongva (a Takic-language group), the native peoples living in the Los Angeles area. The name Gabrielino was derived from the name given by the Spanish colonizers to the local people who were forced to the Mission San Gabriel. More recently, some have ascribed the native name Tongva to these people. Ethnographic and ethnohistoric sources agree that the San Fernando Valley lies within the ethnohistoric territory of the Gabrielino/Tongva, close to its boundary with the Chumash people. According to mission records, the Chumash people were the primary occupants of the western Santa Monica Mountains during the late 1700s. In contrast, the San Fernando Valley was considered the territory of the Gabrielino/Tongva people, or Fernandeno, in reference to the local Mission San Fernando. Only a short distance to the north of the Santa Clara River and San Fernando Valley was the territory of the Tataviam (Alliklik), an inland group related to the Gabrielino/Tongva.

Gabrielino/Tongva territory stretched west from San Bernardino to the coast and from Aliso Creek in the south to San Fernando Valley in the north. The people living in the San Fernando Valley are more correctly known as Fernandeano, who spoke a slightly different dialect from the other Gabrielino/Tongva. The Simi Hills divide the Gabrielino/Tongva and Chumash territories, with Chumash settlements in the Simi Valley and Gabrielino/Tongva settlements on the San Fernando Valley side of the hills. The Santa Monica Mountain coast is divided roughly in half between the Chumash and Gabrielino/Tongva. Additionally, mission records suggest that the Chumash extended deep into what has traditionally been considered Gabrielino/Tongva territory.

Very little is known about the traditional culture and lifestyle of the Gabrielino/Tongva; the patterns of their lifeways and activities were disrupted by colonization before systematic ethnographic studies were initiated. Much of what passes as Gabrielino/Tongva ethnography is derived from the ethnography of the Chumash culture that is based on information mostly gleaned from the diaries and journals of early Spanish explorers.

Similar to many ethnographically recorded villages in Southern California, Gabrielino/Tongva villages had their own territories and were often located in defensible canyons or coves near reliable water supplies. The Gabrielino/Tongva followed a seasonal round. Some inland groups would move to the coast in the winter after their acorn stores had been depleted, and others moved to the coast during the summer months. At the time of European colonization, more than 100 Gabrielino/Tongva villages might have existed with 60 to 200 residents.

Subsistence among the Gabrielino/Tongva was based on foraging all manner of terrestrial and marine resources. The most important foods were acorns, pine nuts, wild cherry, soap-plant bulbs, deer, rabbits, waterfowl, sea mammals, fish, and shellfish. Hunting technology included the bow and arrow, throwing club, snares, deadfall traps, harpoons, fishing line and hooks, nets, fire, and animal decoys. Gathering technology included digging sticks, burden baskets, beaters, and tongs for gathering cactus fruit. The mano and metate were used for preparing food, as were the mortar and pestle and leaching baskets.

Steatite, fish, shell beads (used as money), and otter pelts were traded from the islands to coastal groups, who probably then traded with inland groups for such items as seeds and deer skin. Other important goods that moved from the inland areas toward the coast included obsidian, chert and jasper, and ceramics.

Among the native villages in the San Fernando Valley was Kawenga (also spelled Kawengna, Kaweenga, Kawengnavit, Kawepet, Cabuenga, Cabuepet, Caguenga, or the Hispanicized version Cahuenga), which Hugo Reid listed in 1852 as one of the principal “lodges” or “rancherías” of the valley.

Kawenga may have been in a geographically strategic location along the south bank of the Los Angeles River in the transition zone between the valley bottom and foothills. The Central Branch of Tujunga Wash once joined the Los Angeles River at this point, making it one of the better-watered locations in the valley. Cahuenga Pass was also an important route between the San Fernando Valley and the Los Angeles Basin as it linked the Gabrielino/Tongva community of Yanga, along the eastern bank of the Los Angeles River across from the Pueblo of Los Angeles, and the many Native American communities of the valley. However, based on the academic record, any locational attribution of a specific village was viewed as tentative.

Despite several previous surveys, as well as the excavations at Campo de Cahuenga, no physical evidence of Kawenga has been found. Evidence of this settlement may have been destroyed before the first archaeological investigations in the area were undertaken.

#### *(f) Mission Period Through Present Day*

The Mission San Fernando was established in 1796 under the military jurisdiction of the presidio in San Diego. Mission San Fernando controlled the land at the Project Site and colonized the land throughout the San Fernando Valley for ranching and farming. In 1834, the entire mission system was dismantled at the decree of the Congress of Mexico, secularizing the missions. All mission holdings were taken from the Catholic Church to be developed into secular *ejidos* (communal land-holding pueblos) under the control of the Native American subjects affiliated with each mission. Early urban development began around 1909, and, by 1928, the Project Site was developed with studio uses.

## (2) California Historical Resources Information System Review

A records search of the California Historical Resources Information System (CHRIS) was conducted by staff at the South Central Coastal Information Center (SCCIC) at California State University Fullerton on April 3, 2023, for the Project Site and a surrounding 2-mile radius. The CHRIS records search is included as Appendix A of the Tribal Cultural Resources Report, included in Appendix R of this Draft EIR. This search included the SCCIC's collections of mapped prehistoric, historic, and built environment resources, California Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional sources that were consulted include the National Register, the California Register, the California Historical Landmarks list, the California Points of Historical Interest list, the California OHP State Historic Resources Inventory, and the Los Angeles HCMs list.

*(a) Previously Conducted Cultural Resource Studies*

Results of the records search indicate that no previous archaeological studies have involved the Project Site, although there have been 120 previous cultural resource investigations conducted within the records-search area (see Figures 23 through 25 on pages 50 and 52 of the Archaeological Resources Assessment included in Appendix F.2 of this Draft EIR). Most are reports of cultural resources assessments in association with the development of cellular facilities, transportation projects, and urban-redevelopment plans. Of these projects, two projects (LA-07427 and LA-07430) adjoined the Project Site, with LA-07427 adjoining the southeastern boundary of the Project Site and LA-07430 adjoining the northern corner of the Project Site. Both of these projects are bridge inventory updates for the California Department of Transportation. During these projects, two bridges—the Moorpark Street over West Branch of Tujunga Wash Bridge (P-19-187568) and the Colfax Avenue Bridge (Bridge No. 53C1141)—were evaluated for their eligibility for listing in the National Register and were determined to be ineligible.

*(b) Previously Recorded Cultural Resources*

No archaeological resources have been previously recorded within the Project Site. However, the records search did identify 18 previously recorded resources within the records search area (see Table 3 of the Archaeological Resources Assessment included in Appendix F.2 of this Draft EIR), consisting of 11 archaeological sites (nine historical period and two prehistoric), two built-environment resources, and five isolated prehistoric resources. The nine historical period sites primarily consisted mainly of refuse scatters or dumps, and one historical period site consisted of the Feliz Adobe (CA-LAN-1945H). The two prehistoric sites (CA-LAN-1110 and CA-LAN-4894) consisted of scattered or intact human burials associated with prehistoric artifacts and are discussed further below. The two built-environment resources consisted of the Moorpark Street over West Branch of Tujunga Wash Bridge (P-19-187568) and the Colfax Avenue Bridge (Bridge No. 53C1141), which were determined to be ineligible for listing on the National Register. The isolated prehistoric resources consisted of ground stone tools, a possibly worked fragment of obsidian, and a possible human burial. In addition to isolated resources reported in the records search results, background research identified a report of one isolated artifact discovered during sewer excavations at a home approximately 1.5 miles west-northwest of the Project Site in 1954.

Nearly all of these resources were located over 1 mile from the Project Site, with four resources identified within 0.25 miles. Both the Moorpark Street over West Branch of Tujunga Wash Bridge (P-19-187568) and the Colfax Avenue Bridge (Bridge No. 53C1141) were evaluated but recommended not eligible for listing in the National Register. The Feliz Adobe (CA-LAN-1945H), also identified as the former headquarters of the Campo de Cahuenga, is a California Historical Landmark (No. 151), a Los Angeles HCM (No. 29), and was nominated to be listed in the National Register. The four resources identified within 0.25 miles of the Project Site are further summarized below.

*(i) CA-LAN-1110 (P-19-001110)*

CA-LAN-1110 is located east of the Project Site and consists of over 1,000 fragments of human bone along with numerous ground stone and flaked stone artifacts and fragments of shell, including abalone fragments, that were found between 1980 and 1981 during the excavation for a cellar. Approximately 25 percent of the human bone was burned. Cultural resources were found up to 14 feet below ground surface (no surficial evidence of the site was observed) in the remains of a sand bar located in a former floodplain or river terrace. A majority of the site appeared to have been buried beneath houses and yards surrounding the property. The ground stone artifacts that were found included a globular mortar, a pestle fragment, steatite vessels and pipes, and slate palette fragments. Flaked stone artifacts included bifaces and approximately 200 flakes. Crystals made up of an unknown material and some nonhuman bones were also encountered.

*(ii) CA-LAN-4894 (P-19-004894)*

CA-LAN-4894 is located east of the Project Site and consists of midden material and associated human burial materials that were discovered in 2019 by a landscaping crew while trenching for an irrigation pipe. The site has a depth of at least 2 feet. Artifacts found in the midden consist of projectile points, stone tools, debitage, bone tools and bone-tool-production waste, abalone shell fragments, and fire-affected rock. The site record did not specify or define the functions of the “stone tools” or “bone tools.”

*(iii) Moorpark Street over West Branch of Tujunga Wash Bridge (P-19-187568)*

The Moorpark Street over West Branch of Tujunga Wash Bridge is located north of the Project Site. This bridge was constructed in 1952, likely as part of a flood-control project that channelized the wash. The bridge was widened from 1959 to 1960. The bridge was evaluated in 2003 and was recommended as not eligible for listing in the National Register and is not considered a historical resource for the purposes of CEQA.

*(iv) Colfax Avenue Bridge (Bridge No. 53C1141)*

The Colfax Avenue Bridge is located east of the Project Site. The bridge was constructed in 1956 and consists of a single, steel rigid connected Warren deck truss span with vertical supports. The bridge was evaluated in 2003 and was recommended as not eligible for listing in the National Register as the bridge was likely built as part of local road improvement efforts and does not appear to be a significant example with that context.

### 3. Project Impacts

#### a. Thresholds of Significance

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

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

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

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

For this analysis, the Appendix G Thresholds provided above are relied upon. The analysis also considers the factors identified in the *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

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

#### (1) Historical Resources

Would the project result in a substantial adverse change in the significance of an historical resource due to:

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

Under CEQA, a project would have a significant effect on the environment if the project would result in a substantial adverse change in the significance of a historical resource as

defined in CEQA Guidelines Section 15064.5(b).<sup>34</sup> 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.”<sup>35</sup>

## (2) Archaeological Resources

Would the project disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100 years old and possesses substantial stratigraphic integrity;<sup>36</sup> or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

## b. Methodology

### (1) Historical Resources

Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so; (2) a determination of whether the Project would result in a “substantial adverse change” in the significance of the resource or resources. As part of the evaluation for the Historical Resources Report prepare for the Project, field surveys of the existing buildings, structures, objects, and landscaped areas located on the Project Site and the Project Site vicinity were conducted. Additionally, previous historical resource evaluations, inventories, building permits, Sanborn maps, historical photographs,

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<sup>34</sup> *Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).*

<sup>35</sup> *CEQA Guidelines Section 15064.5(b)(1).*

<sup>36</sup> *Although the CEQA criteria state that “important archaeological resources” are those which are at least 100 years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50 years-old.*

records searches, and newspaper articles of the Project Site and Project Site vicinity were reviewed.

## (2) Archaeological Resources and Human Remains

To address potential impacts associated with archaeological resources, a CHRIS records search was conducted by staff at the SCCIC to assess the archaeological sensitivity of the Project Site and Project Site vicinity (including whether archaeological resources have been previously recorded and/or within a 2-mile radius of the Project Site). In addition, existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources and/or human remains during Project construction. Geoarchaeological background research included review of the results of previous geotechnical reports from the Project Site and Project Site vicinity, historical maps, aerial photographs, and published soils data. Trenching also occurred from August 14, 2023, to August 18, 2023, to probe multiple dispersed locations across the Project Site to look for buried archaeological deposits, expose sediment profiles to better document local soils and stratigraphy as they relate to archaeological sensitivity, and to make recommendations regarding the need for additional geoarchaeological testing.

### c. Project Design Features

The following Project Design Features are proposed with regard to cultural resources:

**Project Design Feature CUL-PDF-1:** The Mill Building will be relocated and rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation. The relocation and reassembly of the Mill Building will be conducted in a manner that preserves the historic base and facades and maintains its integrity so that it remains eligible for historic listing without implying a false historic condition or creating a false sense of historical development.

**Project Design Feature CUL-PDF-2:** Signs attached to the Stage 2 façades will be placed so as not obscure the rectangular form and curved bow-truss roof characteristic of Stage 2.

### d. Analysis of Project Impacts

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



## (1) Impact Analysis

As described above, the Project Site includes three potentially historic structures, as well as the potential Mack Sennett Historic District. The Project's potential impacts on these individual resources are addressed separately below.

### *(a) Mack Sennett Historic District*

The potential Mack Sennett Historic District is historically significant as a grouping of buildings that are collectively representative of a motion picture studio dating from the Major Studio Era. The potential Mack Sennett Historic District contains 10 buildings, of which six are considered contributing buildings to the potential Historic District.

The Project would involve the following activities that have the potential to adversely impact the potential Mack Sennett Historic District:

- Removal of all three of the non-contributing buildings;
- Removal of the contributing Telco building, originally constructed in 1928 and used historically for camera storage and repair;
- Removal of contributing Building 3, originally constructed in 1928 and historically used as a processing laboratory and for casting;
- Relocation and rehabilitation of the Arts/HR Building, constructed in 1928 and historically used to house the property and wardrobe departments and as an on-site hospital;<sup>37</sup>
- Rehabilitation of Stage 9 and Stage 10, two sound stage buildings originally constructed in 1928;<sup>38</sup>
- Rehabilitation of the Mack Sennett Building, originally constructed in 1928 as the main administration building for the studio complex; and
- Construction of new buildings adjacent to the potential Mack Sennett Historic District.

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<sup>37</sup> *The Arts/HR Building would be relocated approximately 50 feet west and slightly north of its current location but would remain within the potential historic district boundary.*

<sup>38</sup> *This includes rehabilitation of the former dressing rooms and writer's rooms attached to the western façade of Stage 9.*

Potential impacts of these activities to the potential Mack Sennett Historic District are discussed below.

*(i) Potential Impacts from Removal of Buildings within the Potential Historic District*

The Project would remove five buildings within the boundary of the potential Mack Sennett Historic District. Two of these buildings, the Telco Building and Building 3, are considered contributors, and three buildings are non-contributors. Because the three non-contributing buildings have been substantially altered and do not possess sufficient integrity to contribute to the historic significance of the potential Historic District, removal of the three non-contributing buildings would not substantially reduce the integrity of the potential Historic District.

The Project would result in the removal of two contributing buildings, representing one-third of the existing contributors to the potential Mack Sennett Historic District. As proposed, the Project would retain four contributing buildings, representing two-thirds of the contributing buildings within the boundaries of the potential Historic District. The contributing buildings to be retained would include the largest and most physically prominent of the contributing buildings (the Mack Sennett Building, Stage 9, and Stage 10), as well as the two contributors that retain the highest level of integrity (Stage 9 and Stage 10). The Project would retain the Mack Sennett Building, originally constructed as the main administration building and historically the de facto public face of the studio during the Major Studio Era, situated at the southwestern corner of the studio property and originally fronted by an expanse of lawn. The Project would also retain the Arts/HR Building, representative of the support functions necessary for motion picture studio operations during the Major Studio Era. No specific numeric threshold has been established to assess when a proposed project compromises the integrity of a district and, therefore, represents an adverse impact to the resource. However, according to standard preservation practice, a general benchmark for determining whether a district remains eligible is the retention of 60 percent of the district contributors.

The two contributing buildings to be removed, the Telco building and Building 3, retain fair integrity and are located at the northern edge of the potential Mack Sennett Historic District. Although they are representative of support functions characteristic of independent motion picture studios during the Major Studio Era, they are not critical to understanding the historic significance of the potential Mack Sennett Historic District, and the potential Historic District would still convey its significance despite their removal. After implementation of the Project, the potential Mack Sennett Historic District would continue to retain a concentration of buildings that date from the period of significance and reflect its historic identity as an independent motion picture studio operating during the Major Studio Era. The retained contributing buildings represent a majority of the existing contributing square footage and the

highest levels of integrity among the contributing buildings and include the most physically prominent contributors, including the Mack Sennett Building, which is the only portion of the potential Historic District directly visible to the public.

As detailed in the Historical Resources Report, the potential Mack Sennett Historic District retains integrity of location, design, setting, feeling, and association. After the removal of the two contributing buildings, the potential Mack Sennett Historic District would continue to retain integrity of location, design, setting, feeling, and association with the four remaining contributing buildings after implementation of the Project. As a result, the proposed removal of two contributing buildings to the potential Mack Sennett Historic District would not reduce the integrity of the potential Historic District such that it can no longer convey its historic significance. **Thus, the removal of contributing buildings would not cause a substantial adverse change in the significance of the potential Mack Sennett Historic District, and, as such, impacts to the potential Historic District would be less than significant.**

*(ii) Potential Impacts from the Relocation of the Arts/HR Building within the Potential Historic District*

The Project would relocate the Arts/HR Building, a contributor to the potential Mack Sennett Historic District, approximately 50 feet west and slightly north of its current location. Removal of a historical resource from its original physical location has the potential to diminish its historic integrity. Specifically, location is one of the seven aspects of historic integrity and is defined as the place where the historic property was constructed or the place where the historic event took place. For evaluation of impacts to the potential Mack Sennett Historic District, it is important to note that as a potential historic district, the buildings that comprise the potential Mack Sennett Historic District are not considered historical resources individually but together form a single historical resource.

The National Park Service has established a special criterion for moved properties, Criterion Consideration B, as a guide to evaluating their potential historic significance. According to Criterion Consideration B, “[a] property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.” The guidance, however, goes on to state that “[a] moved building that is part of a complex but is of less significance than the remaining (unmoved) buildings” does not need to meet Criterion Consideration B in order to be considered.<sup>39</sup> Because the Arts/HR Building is one component of the larger potential Mack Sennett Historic District, Criterion Consideration B does not apply.

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<sup>39</sup> National Register Bulletin 15. How to Apply the National Register Criteria for Evaluation. *Washington D.C.: National Park Service, U.S. Department of the Interior, 1995. p. 29.*

Issues relating to relocation are also addressed in the Rehabilitation Standards. Standard 2 states that “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.”<sup>40</sup> In addition, special criteria considerations for California Register eligibility state that for moved buildings, structures, and objects, “it is recognized that moving an historic building, structure, or object is sometimes necessary to prevent its destruction. Therefore, a moved building, structure, or object that is otherwise eligible may be listed in the California Register if it was moved to prevent its demolition at its former location and if the new location is compatible with the original character and use of the historical resource. A historical resource should retain its historic features and compatibility in orientation, setting, and general environment.”<sup>41</sup>

Relocation of the Arts/HR Building would alter the original plan and configuration of the potential Mack Sennett Historic District by relocating one of its contributing buildings. The Arts/HR Building, however, would remain in the same general vicinity, having been moved only 50 feet to the west and slightly north of its original location. The other remaining contributing buildings, all of which are larger and more physically prominent than the Arts/HR Building, would remain in their original location after implementation of the Project. These buildings establish the primary configuration of buildings and open spaces that characterize the potential Mack Sennett Historic District and define its important spatial relationships. After relocation of the Arts/HR Building, the majority of the original configuration of buildings and spatial relationships that characterize the potential Mack Sennett Historic District would remain intact and unaltered. However, relocation of the Arts/HR Building does have the potential to damage historic features and fabric that would reduce the integrity of the building such that it would no longer contribute to the significance of the potential Mack Sennett Historic District.

Additionally, relocation of the Arts/HR Building has the potential to imply a false historic condition. As stated in Standard 3 of the Rehabilitation Standards, “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.” Moving an existing contributing building to a new location has the potential to create a false sense of historical development within the potential Mack Sennett Historic District.

**Therefore, based on the above, relocation of the Arts/HR Building has the potential to damage and affect the integrity of the building, as well as create a false**

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<sup>40</sup> U.S. Department of the Interior, National Park Service, *the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, 2017.

<sup>41</sup> California Office of Historic Preservation Technical Assistance Series No. 6, p. 3.

**sense of historic development within the potential Mack Sennett Historic District and cause a substantial adverse change in the significance of the potential Historic District, which could result in a potentially significant impact to the potential Historic District.**

*(iii) Potential Impacts from Rehabilitation of the Mack Sennett Building*

The Project would rehabilitate the Mack Sennett Building to bring it closer to its original appearance. Non-original additions and features would be removed, and original features would be restored and/or recreated using archival photographs. **Rehabilitation of the building could cause a substantial adverse change in the significance and integrity of the Mack Sennett Building, and a potentially significant impact could occur.**

*(iv) Potential Impacts from Rehabilitation of Stages 9 and 10*

The Project may include the rehabilitation of Stages 9 and 10 to accommodate future tenants and their needs. This analysis conservatively concludes that rehabilitation has the potential to remove historic features and fabric and reduce the integrity of the building such that it would no longer convey its historic significance. **Rehabilitation of the building could cause a substantial adverse change in the significance and integrity of Stages 9 and 10, and a potentially significant impact could occur.**

*(v) Potential Impacts from Proposed New Construction Adjacent to the Potential Historic District*

As discussed in the Historical Resources Report included in Appendix F.1 of this Draft EIR, all new construction proposed by the Project would be generally located north and east of contributing buildings to the potential Mack Sennett Historic District and would not be located within the spaces between contributing buildings. This includes the area between the potential Mack Sennett Historic District and Radford Avenue, which currently allows public views to contributing buildings, including the Mack Sennett Building (the historic public face of the studio lot) and portions of Stage 9. As such, the important spatial relationships among contributing buildings would not be interrupted by the proposed new construction of buildings.

In addition, the proposed new construction would be limited to sound stage, production support, production office, general office, and retail uses; all of which, excluding retail uses, currently operate on the Site and consistent with the historic uses on the Project Site. New construction would be contemporary versions of building types and uses historically common to entertainment production facilities. In this way, the larger setting of Radford Studio Center outside the potential Mack Sennett Historic District would not substantially change in terms of use or plan.

Heights of the proposed new buildings surrounding the potential Mack Sennett Historic District would range from approximately 60 feet for new sound stages north of contributing Stages 9 and 10 (analogous to other existing sound stages outside the potential Historic District) to up to approximately 120 feet for new office uses east of Stage 10. The new construction of taller buildings outside the potential Mack Sennett Historic District, however, would not substantially alter the historic significance or integrity of the potential Historic District such that its ability to convey its historic significance would be materially impaired.

Additionally, new construction proposed by the Project would not affect the integrity of location, design, materials, or workmanship for the potential Mack Sennett Historic District or its component contributing buildings as contributing buildings to be retained would not be materially altered by new construction associated with the Project.

As noted in Subsection 2.a.(1)(a) above, the National Park Service defines a historic district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”<sup>42</sup> Thus, a district derives its significance as a single unified entity. Boundaries for districts are selected to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects that contribute to the historic significance of the district and delineate the district from immediately surrounding areas of a different historic character or development pattern.<sup>43</sup> In this manner, features associated with the historic significance of the potential Mack Sennett Historic District are necessarily included within the district boundaries. The broader area (located outside the potential Historic District boundaries) is not considered character-defining or important to the integrity of the potential Mack Sennett Historic District. Therefore, integrity of feeling would also remain unaffected because all the existing physical components that characterize and contribute to the potential Historic District would remain and continue to convey their historic significance. New construction located outside the potential Mack Sennett Historic District boundary would not adversely affect integrity of feeling. Because the important physical characteristics of the potential Mack Sennett Historic District would not be altered by new construction associated with the Project, the potential Mack Sennett Historic District would remain a collection of buildings representative of independent motion picture studios from the Major Studio Era; accordingly, integrity of association would also remain unaffected by the Project.

The only aspect of integrity that could possibly be affected by the Project is setting. Setting features important to the potential Mack Sennett Historic District are largely contained

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<sup>42</sup> *National Register Bulletin #15, p. 5.*

<sup>43</sup> *National Register Bulletin Defining Boundaries for National Register Properties, Washington D.C., U.S. Department of the Interior, National Park Service, revised 1997, p. 12.*

to the paths and interstitial spaces between contributing buildings as well as the outdoor areas between contributing buildings and Radford Avenue. New construction outside the Historic District would not adversely alter these setting features.

In summary, all the relevant aspects of integrity would be unaffected by the new construction associated with the Project such that the historic integrity of the potential Mack Sennett Historic District would be retained. While the Project would alter the broader setting of the potential Mack Sennett Historic District by adding new buildings taller than the contributing buildings to the east, north, and south of the potential Historic District, this change in the broader setting would not materially impair the potential Historic District such that it can no longer convey its historic significance. After the new construction associated with the Project is completed, the potential Mack Sennett Historic District, including its important contributing buildings, would remain intact and collectively would continue to convey their historic significance. For these reasons, the significance and integrity of the potential Mack Sennett Historic District would not be materially impaired. **Thus, new construction associated with the Project would not cause a substantial adverse change in the significance of the potential Mack Sennett Historic District, and the potential impact to the potential Historic District would be less than significant.**

*(b) Mill Building*

The existing Mill Building is historically significant as a rare and generally intact example of a motion picture studio mill building from the Major Studio Era. The Project would involve the following activities that have the potential to adversely impact the Mill Building:

- Relocation of the Mill Building from its original location at the southern edge of the South Lot to the southeastern corner of the North Lot.
- Rehabilitation of the Mill Building to include a reduction of its present size to fit the spatial constraints of the new location in the North Lot.

Potential impacts of these activities to the Mill Building are discussed below.

*(i) Potential Impacts from the Relocation of the Mill Building*

As previously noted, the National Park Service has established a special criterion for moved properties, Criterion Consideration B, as a guide to evaluating their potential historic significance. The Mill Building is eligible as a distinctive property type associated with motion picture studios during the Major Studio Era. Therefore, the Mill Building is primarily significant for its architectural value as a property type and meets eligibility requirements of Criterion Consideration B.

With regard to the California Register special criteria considerations for moved buildings that a historical resource should retain its historic features and compatibility in orientation, setting, and general environment, the Mill Building would be relocated to a compatible new site north of its original location within the studio property boundaries, situated among other studio buildings and uses. The Mill Building is currently oriented along a northwest-southeast axis, and the new location would require the orientation to be modified although it would still be generally aligned northwest-southeast. However, with regard to the building's historic features, relocation of the Mill Building does have the potential to damage historic features and fabric that would reduce the integrity of the building such that it would no longer convey its historic significance.

Relocation of the Mill Building also has the potential to imply a false historic condition. Specifically, moving an existing historic building to a new location has the potential to create a false sense of historical development by placing an older building in a new location.

**Therefore, based on the above, relocation of the Mill Building has the potential to damage and affect the integrity of the building, as well as create a false sense of historic development and cause a substantial adverse change in the significance of the building, which could result in a potentially significant impact to the Mill Building.**

*(ii) Potential Impacts from the Rehabilitation of the Mill Building*

The location for the relocated Mill Building in the southeastern corner of the North Lot at the confluence of the Los Angeles River and the Tujunga Wash is not big enough to accommodate the full extent of the existing Mill Building given the existing structures and flood control infrastructure. Accordingly, the Project proposes a partial relocation that would preserve a majority of the Mill Building.

The Mill Building consists of twelve 20-foot-wide bays from east to west. The seven middle bays are occupied by the studio mill, flanked by the paint shop to the west and the effects shop to the east. Because the proposed new site of the Mill Building can only accommodate seven of the twelve existing bays, the Project proposes to relocate the seven middle bays so that the original and largely unaltered mill space is retained in its entirety. Three bays from the east end of the Mill Building and two bays from the west end would be removed to reduce the total length of the building. These areas have also sustained more alteration along the northern façade.

To maximize retention of historic materials and character-defining features, the Project proposes that the remaining western and eastern façades also be retained, relocated, and attached to the corresponding ends of the relocated building. Pursuant to Project Design Feature CUL-PDF-1, the relocation and reassembly of the Mill Building will be conducted in a manner that preserves the historic base and facades and maintains its integrity so that it



remains eligible for historic listing without implying a false historic condition or creating a false sense of historical development.

The southern façade walls of the Mill Building were largely removed to accommodate the existing 1997 addition, which is not character-defining and would not be retained. After relocation, the southern façade would be restored as closely as possible to its historic configuration and appearance, including reuse of historic steel industrial windows from other parts of the building, where similar windows existed on the southern façade. Historic photos are available to guide recreation of the original fenestration pattern and door locations. Any required structural upgrades would be implemented on the interior and designed to be minimally visible from the building's exterior.

Notwithstanding the above, it is assumed that rehabilitation has the potential to remove historic features and fabric and reduce the integrity of the building such that it would no longer convey its historic significance.

Additionally, rehabilitation of the Mill Building has the potential to imply a false historic condition by suggesting that the rehabilitated Mill Building represents its original size and condition.

**Therefore, based on the above, rehabilitation of the Mill Building has the potential to affect the integrity of the building, as well as create a false sense of historic development and cause a substantial adverse change in the significance of the building, which could result in a potentially significant impact to the Mill Building.**

*(c) Administration Building*

The Administration Building is historically significant as an example of brutalist architectural design. The Project would involve the following activities that have the potential to adversely impact the Administration Building:

- Rehabilitation of the Administration Building for continued use as a production/general office building.
- Construction of new buildings adjacent to the Administration Building.
- Relocation of the Arts/HR Building closer to the Administration Building.

Potential impacts of these activities to the Administration Building are discussed below.

*(i) Potential Impacts from Rehabilitation of the Administration Building*

The Project may include the rehabilitation of the Administration Building to accommodate future tenants and their needs. To provide a conservative impact analysis, it is assumed that rehabilitation has the potential to remove historic features and fabric and reduce the integrity of the building such that it would no longer convey its historic significance. **Therefore, future rehabilitation of the Administration Building could cause a substantial adverse change in the significance of the building, which could result in a potentially significant impact to the Administration Building.**

*(ii) Potential Impacts from Proposed New Construction Adjacent to the Administration Building*

The proposed new construction adjacent to the Administration Building would be limited to a new production/general office building that would be constructed as a distinct and separate building approximately 30 feet north of the Administration Building. The Administration Building is also located approximately the same distance from the existing Buildings 1 and 2. In addition, as detailed in the Historical Resources Report included in Appendix F.1 of this Draft EIR, the new production/general office building would be designed such that the Administration Building retains its visual prominence when viewed from the public right-of-way along Radford Avenue. The expressed horizontal floor plates on the exterior of the new production/general office building would generally align with those of the Administration Building, emphasizing the compatibility of the new building with the Administration Building.

In summary, construction of the new building adjacent to the Administration Building would not destroy any historic materials or features that characterize the Administration Building. After Project buildout, the distinctive form and design of the Administration Building would remain intact, and its architectural features would remain visible. For these reasons, new construction adjacent to the Administration Building would not materially alter in an adverse manner the physical characteristics that convey its historical significance and justify its eligibility for listing as a historical resource. **Thus, new construction adjacent to the Administration Building would not cause a substantial adverse change in the significance of the building, and the potential impact to the Administration Building would be less than significant.**

*(iii) Potential Impacts from Relocation of the Arts/HR Building Closer to the Administration Building*

As described above, the Project would relocate the Arts/HR Building approximately 50 feet west and slightly north of its current location. This would position the Arts/HR Building closer to the eastern façade of the Administration Building, placing an approximately 20-foot distance between the southeastern corner of the Administration Building and southwestern

corner of the Arts/HR Building (the closest point between the two buildings). This distance would widen up to approximately 40 feet between the two buildings moving north. Although it would be located closer to the Administration Building, relocation of the Arts/HR Building would not alter or destroy any historic materials or features that characterize the Administration Building. In addition, the Arts/HR Building is a one-story building of very simple design in comparison to the much larger, four-story brutalist Administration Building, and its relocation would not obscure or detract from the visual dominance of the Administration Building in any meaningful way. Moreover, the Arts/HR Building would be relocated east of the Administration Building, leaving the more public-facing southern, western, and northern façades of the Administration Building unencumbered.

After relocation of the Arts/HRG Building, the distinctive form and design of the Administration Building would remain intact and its important architectural features would remain visible. For these reasons, relocation of the Arts/HR Building closer to the Administration Building would not materially alter in an adverse manner the physical characteristics that convey the Administration Building's historical significance and justify its eligibility for listing as a historic resource. **Thus, the relocation of the Arts/HR Building would not cause a substantial change in the significance of the Administration Building, and, as such, the potential impact to the Administration Building would be less than significant.**

*(d) Stage 2*

Stage 2 is historically significant as the shooting location for The Mary Tyler Moore Show, the initial television production of MTM Enterprises. The Project would involve the following activities that have the potential to adversely impact Stage 2:

- Rehabilitation of Stage 2 for continued use as a sound stage.
- Construction of new buildings adjacent to Stage 2.
- Addition of signage affixed to the western, eastern, and northern façades (see analysis of the proposed Sign District below).

Potential impacts of these activities to Stage 2 are discussed below.

*(i) Potential Impacts from Rehabilitation of Stage 2*

Future rehabilitation of Stage 2 would be necessary to accommodate future tenants and their needs. To provide a conservative impact analysis, it is assumed that rehabilitation has the potential to remove historic features and fabric and reduce the integrity of the building such that it would no longer convey its historic significance. **As such, future rehabilitation**

**of Stage 2 could cause a substantial adverse change in the significance of the building, which could result in a potentially significant impact to Stage 2.**

*(ii) Potential Impacts from Proposed New Construction Adjacent to Stage 2*

The proposed new construction adjacent to Stage 2 is limited to a new production/general office building just south of Stage 2 and north of the Administration Building. This new building would be constructed as a distinct and separate building, physically distanced from Stage 2 by approximately 60 feet. This is a similar distance from Stage 2 to the existing Buildings 1 and 2. In addition, the new production/general office building would be designed to ensure that Stage 2 remains visible when viewed from the public right-of-way along Radford Avenue. Overall, construction of the new building would not destroy any historic materials or features that characterize Stage 2. After Project buildout, the distinctive form and massing of Stage 2 would remain intact and visible. For these reasons, new construction adjacent to Stage 2 would not materially alter in an adverse manner the physical characteristics that convey its historical significance and justify its eligibility for listing as a historic resource. **Thus, new construction adjacent to Stage 2 would not cause a substantial adverse change in the significance of the building, and the potential impact would be less than significant.**

*(e) Potential Impacts from Proposed Sign District*

As discussed in Section II, Project Description, of this Draft EIR, the Project includes, among other things, a proposed Sign District to regulate on-site signage. The proposed Sign District would regulate the permitted number of signs, sign type, sign height, and the maximum area of signage permitted along each public street frontage. The Sign District would prohibit certain sign types, including off-site signs, and would prohibit digital displays along the Project Site exterior. Perimeter, exterior-facing signs would include wall signs, building identification signs, architectural ledge signs positioned over entry gates, monument signs, and supergraphics. Building façades appropriate for interior signage, including locations for digital signage, are also delineated in the Sign District. Generally, signage is not proposed for any of the contributing buildings to the Historic District, the Mill Building, or the Administration Building. The façades of these historically significant buildings are not identified as locations for exterior-facing or internal signs in the Sign District. As such, the proposed Sign District would not physically alter or change these buildings in any way, and signage proposed by the Sign District does not have the potential to adversely impact these resources.

Stage 2, individually significant for its association with women's rights as the shooting location of The Mary Tyler Moore Show, is identified as a signage location in the Sign District. The proposed Sign District delineates the western façade of Stage 2 as a location for up to five 30-foot by 30-foot exterior-facing wall signs. The eastern façade and eastern half of the

northern façade are also identified as suitable locations for interior digital signage although only a small portion of one of the eastern- or northern-facing façades would be used.

Although the proposed signs would be large, pursuant to Project Design Feature CUL-PDF-2, they would occupy a minor portion of the Stage 2 façades and would not obscure the rectangular form and curved bow-truss roof characteristic of Stage 2, and the building would remain intact and understandable as a stage building after the Sign District is implemented. Proposed signage would also be reversible as sign support structures would be attached in a manner that causes minimal damage to the Stage 2 façades and could be removed in the future without significant damage or alteration to Stage 2.

Thus, signs permitted under the Sign District would not diminish the integrity of any of the historical resources located on the Project Site. All of the historical resources located on the Project Site would remain eligible for listing under national, state, and local landmark and historic district programs, as applicable. **Thus, implementation of the Sign District would not cause a substantial adverse change in the significance of any historical resources on the Project Site, and the potential impacts to historical resources would be less than significant.**

## (2) Mitigation Measures

The following mitigation measures are included to address the Project's potential impacts to historical resources:

**Mitigation Measure CUL-MM-1: Qualified Historic Preservation Professional.** A qualified historic preservation professional shall be retained to ensure that all rehabilitation, relocation, and alteration of historical resources located on the Radford Studio Center property, including the potential Mack Sennett Historic District and all its contributing buildings, the Mill Building, the Administration Building, and Stage 2 are conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation to ensure that any alteration, rehabilitation, and/or relocation would protect the historic integrity of the historical resources. The historic preservation professional shall meet the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in the rehabilitation of historic buildings. The historic preservation professional shall review the construction drawings for compliance with the Standards. If the drawings do not meet the Standards, the historic preservation professional shall make recommendations for bringing them into compliance. The historic preservation professional shall ensure the notes on the drawings include procedures for unforeseen discoveries during construction. The historic preservation professional shall prepare a technical memorandum with

findings, recommendations, and conclusions, which shall be submitted to the Los Angeles Office of Historic Resource (OHR) for review and concurrence. Building permits shall not be issued until the Los Angeles OHR has concurred the drawings comply with the Standards.

**Mitigation Measure CUL-MM-2: Documentation.** Prior to the commencement of demolition, relocation, or rehabilitation work, the Project Site shall be documented in accordance with Historic American Building Survey (HABS) guidelines. Level II documentation shall address the Project Site as a whole. One archival copy of the historic report in narrative format, photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-3: Interpretative Program.** The Project shall include an interpretive program that informs the public about the history of the Project Site. The program may be on- or off-site and could be a physical display, digital information, or a combination of the two. The concept for the program shall be submitted to the Los Angeles OHR for approval, prior to execution.

**Mitigation Measure CUL-MM-4: Mack Sennett Building Historic Structure Report.** A Historic Structure Report (HSR) shall be prepared for the Mack Sennett Building in accordance with Preservation Brief 43: The Preparation and Use of Historic Structure Reports. The HSR shall summarize the Mack Sennett Building's development history and historic significance; identify its character-defining features; document existing conditions; and describe recommended methods and treatments for its rehabilitation in conformance with the Secretary of the Interior's Standards. The HSR shall be submitted for review and approval by the Los Angeles OHR prior to the development of architectural or engineering plans.

**Mitigation Measure CUL-MM-5: Mack Sennett Building Documentation.** Prior to the commencement of rehabilitation or any related preparatory work, the Mack Sennett Building shall be documented according to HABS guidelines. Level II documentation shall include a historic report in narrative format. One archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-6: Mack Sennett Building Standards Compliance.** The Mack Sennett Building shall be rehabilitated in accordance with the HSR and Secretary of the Interior's Standards for Rehabilitation. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic

architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.

2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Mack Sennett Building.

Compliance with the Rehabilitation Standards shall be disclosed in the lease agreements, agreed upon in writing, and mutually enforced by the Applicant and the City. The tenants shall not be permitted to conduct work that does not comply with the Rehabilitation Standards.

**Mitigation Measure CUL-MM-7: Mill Building Historic Structure Report.** An HSR shall be prepared for the Mill Building in accordance with Preservation Brief 43: The Preparation and Use of Historic Structure Reports. The HSR shall summarize the Mill Building's development history and historic significance; identify its character-defining features; document existing conditions; and describe recommended methods and treatments for its relocation and rehabilitation in conformance with the Secretary of the Interior's Standards. The HSR shall be submitted for review and approval by the ] Los Angeles OHR prior to the development of architectural or engineering plans.

**Mitigation Measure CUL-MM-8: Mill Building Documentation.** Prior to the commencement of relocation and rehabilitation or any related preparatory work, the Mill Building shall be documented according to HABS guidelines. Level I documentation shall include a historic report in narrative format and measured drawings. One archival copy of the historic report, photographs, negatives, and drawings shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-9: Mill Building Standards Compliance.** The Mill Building shall be relocated and rehabilitated in accordance with the HSR and Secretary of the Interior's Standards for Rehabilitation

(Rehabilitation Standards). The relocation and rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Mill Building.

**Mitigation Measure CUL-MM-10: Mill Building Interpretive Display.** The Project shall include an interpretive display to be located on-site at the Mill Building's new location. The interpretive display shall summarize the history and significance of the Mill Building and describe its original configuration and location prior to relocation.

**Mitigation Measure CUL-MM-11: Arts/HR Building Historic Structure Report.** An HSR shall be prepared for the Arts/HR Building in accordance with Preservation Brief 43: The Preparation and Use of Historic Structure Reports. The HSR shall summarize the Arts/HR Building's development history and historic significance; identify its character-defining features; document existing conditions; and describe recommended methods and treatments for its relocation and rehabilitation in conformance with the Secretary of the Interior's Standards. The HSR shall be submitted for review and approval by the Los Angeles OHR prior to the development of architectural or engineering plans.

**Mitigation Measure CUL-MM-12: Arts/HR Building Documentation.** Prior to the commencement of relocation and rehabilitation or any related preparatory work, the Arts/HR Building shall be documented according to HABS guidelines. Level II documentation shall include a historic report in short format. One archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress.



Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-13: Arts/HR Building Standards Compliance.** The Arts/HR Building shall be relocated and rehabilitated in accordance with the HSR and Secretary of the Interior's Rehabilitation Standards. The relocation and rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Arts/HR Building.

**Mitigation Measure CUL-MM-14: Arts/HR Building Interpretive Display.** Develop an interpretive display to be located on-site at the Arts/HR Building's new location. The interpretive display shall summarize the history and significance of the Arts/HR Building and describe its original configuration and location prior to relocation.

**Mitigation Measure CUL-MM-15: Telco Building Documentation.** Prior to the commencement of demolition or any related preparatory work, the Telco Building shall be documented according to HABS guidelines. Level II documentation shall include a historic report in short format. One archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Parks Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-16: Building 3 Documentation.** Prior to the commencement of demolition or any related preparatory work, the Building 3 shall be documented according to HABS guidelines. Level II documentation shall include a historic report in short format. One

archival copy of the historic report, photographs, and negatives shall be donated to the HABS division of the National Park Service for transmittal to the Library of Congress. Digital copies of the documentation shall be submitted to the Los Angeles OHR.

**Mitigation Measure CUL-MM-17: Stage 9 Standards Compliance.** Alterations to Stage 9 shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for Stage 9.

**Mitigation Measure CUL-MM-18: Stage 10 Standards Compliance.** Repair and alterations to Stage 10 shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the

plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.

- b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for Stage 10.

**Mitigation Measure CUL-MM-19: Stage 2 Standards Compliance.** Alterations to Stage 2 shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.
  - a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
  - b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for Stage 2.

**Mitigation Measure CUL-MM-20: Administration Building Standards Compliance.** Repairs and alterations to the Administration Building shall be conducted in accordance with the Secretary of the Interior's Rehabilitation Standards. The rehabilitation plans shall be:

1. Created by a licensed architect meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings.
2. Reviewed for compliance with the Rehabilitation Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects.

- a. Reviewer shall create a technical memorandum at each phase (schematic, design and development, and construction documents) of the architectural design process. In the event the plans do not comply with the Rehabilitation Standards, the memorandum shall make recommendations for changes to bring them into compliance.
- b. Reviewer shall submit the memoranda to the Los Angeles OHR for concurrence that the plans comply with the Rehabilitation Standards prior to obtaining a building permit for the Administration Building.

Compliance with the Rehabilitation Standards shall be disclosed in the lease agreements, agreed upon in writing, and mutually enforced by the Applicant and the City. The tenants shall not be permitted to conduct work that does not comply with the Rehabilitation Standards.

### (3) Level of Significance After Mitigation

Project-level impacts related to historical resources would be less than significant with implementation of the mitigation measures listed above.

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

#### (1) Impact Analysis

Excavation depths proposed for the Project are expected to extend approximately 50 feet below grade. Additionally, it is estimated that approximately 880,000 net cubic yards of soil would be exported and hauled from the Project Site.

As detailed above in Subsection 2.b.(2), the geoarchaeological investigation conducted as part of the Archaeological Resources Assessment indicates that, while no artifacts were found, the Project Site may contain historical period archaeological deposits and prehistoric archaeological deposits. For these reasons, the Archaeological Resources Assessment, included in Appendix F.2 of this Draft EIR, concluded that there is high sensitivity for buried archaeological resources within the Project Site, and it is possible that excavation activities associated with the Project would involve intact native sediment that may contain archaeological deposits. **Therefore, the Project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. As such, impacts to archaeological resources would be potentially significant.**

## (2) Mitigation Measures

The following mitigation measures are included to address the Project's potential impacts to archaeological resources:

**Mitigation Measure CUL-MM-21: Qualified Archaeologist.** Prior to the start of ground disturbance activities during Project construction, the Applicant shall retain a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology to implement the Project cultural resource mitigation measures. Ground disturbance includes demolition, digging, trenching, plowing, drilling, tunneling, grading, leveling, clearing, auguring, striping of topsoil, or similar activities (Ground Disturbance Activities). A copy of the executed contract shall be submitted to the Department of City Planning prior to the issuance of any permit necessary for Ground Disturbance Activities.

Prior to the start of Ground Disturbance Activities, the principal archaeologist shall prepare and implement a written Cultural Resource Monitoring and Treatment Plan (CRMTP) to reduce potential Project effects on unanticipated archaeological resources unearthed during construction. The CRMTP shall include the professional qualifications required of key staff, applicable regulatory requirements, monitoring protocols, provisions for evaluating and treating archaeological materials discovered during Ground Disturbance Activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. Applicable regulations shall include, but not be limited to, Public Resources Code (PRC) Section 5024.1; Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines; and PRC Sections 21083.2 and 21084.1. The monitoring protocols shall include, but not be limited to, halting Ground Disturbance Activities within at least a 25-foot radius (50-foot diameter) in the event resources are discovered so that the significance can be determined. Treatment provisions shall include, but not be limited to, the following: statement of the preference for preservation in place (i.e., avoidance) per CEQA Guidelines Section 15126.4(b)(3); description of methods for the adequate recovery of scientifically consequential information; requirements to coordinate with the Tribal Consultant(s) named in Mitigation Measure TCR-MM-1 to ensure that consideration is given to the cultural values ascribed to a resource beyond that which is scientifically important in the event the resource is Native American in origin; and procedures for curating any archaeological materials at a public, non-profit curation facility, university, or museum with a research interest in the materials. The CRMTP shall be reviewed by the Applicant and the consulting Native American tribes identified by the City of Los Angeles and approved by the City of Los Angeles prior to commencement of any Ground Disturbance Activities.

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities.

The Qualified Archaeologist shall coordinate the proper implementation of this mitigation measure during the demolition and excavation phases of the Project. The archaeological and Native American monitor shall observe all Ground Disturbance Activities until the Qualified Archaeologist and Tribal Consultant(s), in consultation with the archaeological and Native American monitors, determine monitoring is no longer necessary, as specified in the CRMTP. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project Site or off-site improvement areas, the Qualified Archaeologist shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring.

Within 30 days of concluding the field component of the archaeological monitoring, the principal archaeologist shall prepare a cultural resources monitoring memorandum summarizing the results of any archaeological finds and stating that the field component of the archaeological monitoring requirement of the mitigation measure has been fulfilled. The cultural resources monitoring memorandum shall also summarize the results of the geoarchaeological testing required by Mitigation Measure CUL-MM-22 and further actions required to fulfill any outstanding requirements of the mitigation measures, including the preparation of a full technical report documenting the results of all cultural resources monitoring and geoarchaeological testing. In the event that archaeological resources are identified, a full technical report shall be prepared documenting the methods and results of all work completed under the CRMTP and Mitigation Measure CUL-MM-22, including, if any, treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register of Historical Resources. The report shall be prepared under the supervision of the Qualified Archaeologist and submitted to the Department of City Planning within one year of completion of the monitoring, unless other arrangements are required given the nature of the discovery. The final report shall be submitted to the SCCIC.

**Mitigation Measure CUL-MM-22: Preparation of a Geoarchaeological Testing**

**Plan.** Prior to the start of Ground Disturbance Activities, the principal archaeologist shall prepare and implement a written geoarchaeological testing plan (GTP) within the area of direct impact where ground-disturbing activities extend more than 12 feet below the existing ground surface. The GTP shall follow the methods and procedures used in the geoarchaeological testing reported herein. Although backhoe trenching and sample screening is the preferred testing method, alternative excavation strategies that allow for recovery of soil samples for screening and detailed recording of sediment stratigraphy may be used in lieu of trenching. The purpose of the GTP is to assess the archaeological sensitivity of portions of the area of direct impact below 12 feet of the existing ground surface.

Excavation of the top 12 feet of sediment within the area of direct impact has already been cleared through the first phase of testing reported herein and may proceed subject to the requirements of the CRMTP prepared in Mitigation Measure CUL-MM-21, above. Once grading of an area reaches 12 feet below the existing ground surface, grading must be halted in that area and the provisions of the GTP shall be applied to the next 12 feet of sediment. Grading may resume upon written notice to proceed from the principal archaeologist and with written concurrence of the Project proponent and lead agency. Grading shall continue in an iterative fashion with geoarchaeological testing being implemented for every 12 feet of vertical excavation until either the bottom depth of construction grading is reached or the principal archaeologist determines that grading has reached depths below which archaeological deposits are unlikely and that archaeological monitoring is sufficient for the identification and treatment of anticipated resources. The GTP may be suspended or stopped upon written notice from the principal archaeologist and with written concurrence of the Project proponent and the lead agency. Suspending or stopping the GTP does not affect the status of the provisions in the CRMTP. The results of geoarchaeological testing shall be fully reported in the cultural resources monitoring memorandum and report required in Mitigation Measure CUL-MM-21.

### (3) Level of Significance After Mitigation

Project-level impacts related to archaeological resources would be less than significant with implementation of Mitigation Measures CUL-MM-20 and CUL-MM-21.

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

## (1) Impact Analysis

The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. If human remains are discovered during Project construction, 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, the 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 determines the remains to be Native American, the coroner shall contact the NAHC who shall identify the most likely descendent. 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. **With compliance with applicable regulations, the Project would not disturb any human remains, and, therefore, impacts related to human remains would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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

### e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Radford Studio Center Specific Plan (Specific Plan) and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project Design Features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, given that cultural resources do not typically vary over the course of a 20-year timeframe, a later buildout date would not affect the impacts or



significance conclusions presented above. Likewise, in the event of an extended buildout, any development on the Project Site would be subject to Mitigation Measures CUL-MM-1 through CUL-MM-21.

## f. Cumulative Impacts

### (1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, there are 13 related development projects that have been identified in the general vicinity of the Project Site through 2028, the Project's anticipated buildout year.<sup>44</sup> These related projects include residential, commercial (including retail, restaurant and supermarket uses), recreational, and sports facility uses. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, one related project (Related Project No. 1) is located in close proximity to the Project Site. Specifically, Related Project No. 1 is located across the Project Site at 4021 Radford Avenue. Related Project No. 1 is a mixed-use development comprised of 54 dwelling units and 3,474 square feet of commercial uses.

#### (a) Historical Resources

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

In assessing cumulative impacts on historical resources, the focus is on related projects located in the vicinity of the Project Site that have the potential to contribute to alterations to identified historical resources on the Project Site and in the Project Site vicinity. As discussed in the Historical Resources Report included in Appendix F.1 of this Draft EIR, no buildings, structures, objects, or sites located in the Project Site vicinity have been listed or designated as historical resources, or previously identified as historical resources through survey evaluation, including SurveyLA. Field investigation conducted in preparation of the Historical Resources Report also did not identify any historically significant buildings,

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<sup>44</sup> Construction could begin as soon as 2025 and end as soon as 2028. While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. A later buildout date would not affect the cumulative impact analysis related to cultural resources.

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

*(b) Archaeological Resources*

As discussed above, with the implementation of Mitigation Measures CUL-MM-20 and CUL-MM-21, the Project would not result in significant impacts to archaeological resources during ground disturbing activities. As with the Project, the related projects are located in an urbanized area that has been previously disturbed. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, including CEQA Guidelines Section 15064.5, PRC Section 21083.2, as well as any site-specific mitigation identified for that related project and/or the City's standard Condition of Approval addressing the inadvertent discovery of archaeological resources. **Therefore, Project impacts to archaeological resources would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(c) Human Remains*

As with the potential for uncovering archaeological resources, the potential for discovering human remains is site-specific based on the underlying conditions and historical uses of that site. Notwithstanding, as with the Project, the related projects are located on sites that have been previously disturbed and the uncovering of human remains is not expected. Furthermore, as with the Project, if human remains are discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5(e), PRC Section 5097.98, and California Health and Safety Code Section 7050.5. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. **Therefore, cumulative impacts to human remains would be less than significant.**

## (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

Cumulative impacts to historical 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.