

Appendix B

HRG Technical Memorandum

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MEMORANDUM

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1. OVERVIEW

Historic Resources Group (HRG) was asked to analyze a modified version (Modified Project) of the TVC 2050 Project (Original Project) for potential impacts to historical resources. HRG previously analyzed the Original Project in the 2022 Historical Resources Technical Report (Historic Report) and Environmental Impact Report (collectively referred to as the EIR).

The EIR analysis determined that the Original Project would not result in a substantial adverse change in the significance of any historical resources located on the Project Site or in the Project Site Vicinity. Therefore, the Original Project's impact on historical resources would be less than significant as defined by CEQA.

The Modified Project represents a reduction in both density and scale in comparison to the Original Project. This memorandum examines the potential impacts of the Modified Project and determines that the Modified Project, like the Original Project, would not result in a substantial adverse change in the significance of any historical resources located on the Project Site or in the Project Site Vicinity. Therefore, impacts on historical resources associated with the Modified Project would be less than significant as defined by CEQA.

Analysis was performed by Paul Travis, AICP, Managing Principal. Paul is a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards.

2. HISTORICAL RESOURCE IDENTIFICATION

One historical resource is located on the Project Site. This is the "Primary Studio Complex," which represents the initial development of Television City by the Columbia Broadcasting System (CBS). Designed by the celebrated architectural firm of William Pereira and Charles

Luckman (Pereira & Luckman) in the International Style, the Primary Studio Complex includes two adjoining buildings constructed in 1952 (the “Service Building” on the east and the “Studio Building” on the west), the 1959 enclosure of the Service Building’s north façade, and a small compressor room addition to the Service Building’s east façade. The Primary Studio Complex has been evaluated as eligible for listing in the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) and is a designated Los Angeles Historic-Cultural Monument (HCM). The period of significance for the Primary Studio Complex is defined as 1952 to 1963.

In addition to the Primary Studio Complex located on the Project Site, five historical resources are located in the Project Site Vicinity:

- The Original Farmers Market at 6333 W. 3rd Street
- Rancho La Brea Adobe (Gilmore Adobe) at 6301 W. 3rd Street
- Chase Bank at 312 N. Fairfax Avenue
- Fairfax Theatre at 7901-7909 W. Beverly Boulevard
- Air Raid Siren No. 25 located on the west side of Ogden Drive between W. Beverly Boulevard and the alley north of Beverly Boulevard

These historical resources have been either listed as historical resources or found eligible for historic listing through survey evaluation.

3. PROJECT MODIFICATIONS

The Modified Project analyzed in this memorandum is a refinement of the Original Project analyzed in the EIR. Changes to the Original Project represented in the Modified Project include the following:

Primary Studio Complex Rehabilitation

- Studio Building second floor and roof to be retained.
- No expansion of the Studio Building to the south. The south wall of the Studio Building to be retained.

Rooftop Addition

- Overall height of the rooftop addition reduced from approximately 36 feet to approximately 18 feet.
- Rooftop addition setback from the north façade of the Studio Building increased from approximately 55 feet to approximately 109 feet.
- Rooftop addition length reduced from approximately 340 feet to approximately 200 feet.
- Rooftop addition width reduced from approximately 92 feet to approximately 80 feet.

- Rooftop addition area reduced from approximately 30,600 square feet to approximately 16,000 square feet.

Adjacent New Development

- Elimination of the West Building.
- Separation of adjacent new development west of the Primary Studio Complex increased from approximately 10 feet to approximately 50 feet.
- Separation of adjacent new development east of the Primary Studio Complex increased from approximately 15 feet to approximately 30 feet.

Viewshed Restoration Area

- Any single-story bungalows constructed between Beverly Boulevard and the Primary Studio Complex have been relocated to the lower plaza level north of the Primary Studio Complex to ensure they remain below the sightline to the Primary Studio Complex from Beverly Boulevard.

4. DISCUSSION OF POTENTIAL IMPACTS

As analyzed in the EIR, the Original Project involves three activities that have the potential to impact historical resources located on the Project Site and in the Project Site Vicinity. These include: (1) the demolition of certain buildings and structures; (2) the rehabilitation of the Primary Studio Complex; and (3) new construction on the Project Site. The potential impacts from the Modified Project are analyzed below.

The Modified Project would comply with the same applicable regulatory requirements and historic Project Design Features (Project Design Features CUL-PDF-1 and CUL-PDF-2) for the Original Project, which are included in the EIR.

5. POTENTIAL IMPACTS FROM DEMOLITION, DESTRUCTION, OR RELOCATION

Demolition under the Modified Project is slightly less than anticipated under the Original Project.¹ As with the Original Project, all demolition associated with the Modified Project would be contained within the Project Site. Therefore, the Modified Project would not demolish any historical resources located in the Project Site Vicinity outside the Project Site. In addition, the Modified Project, as with the Original Project, would not relocate any identified historical resources on the Project Site or in the Project Site Vicinity.

Like the Original Project, the Modified Project includes the demolition of existing facilities on the Project Site. The East Studio Building and all of the ancillary buildings and ancillary structures located on the Project Site would be demolished. None of these buildings and structures were identified as character-defining features of the property in the HCM designation, have not been identified as historically significant contributing elements of the property, and are not considered historical resources for the purposes of CEQA. Therefore, the

¹ The Original Project would demolish approximately 495,860 square feet, whereas the Modified Project would demolish approximately 479,303 square feet.

removal of these buildings and structures under the Modified Project would not materially impair the historic significance and integrity of the Primary Studio Complex or any other historical resource.

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

Like the Original Project, the Modified Project would demolish the southern portion of the original Service Building as part of the rehabilitation of the Primary Studio Complex. A small single-story volume on the eastern facade of the Service Building (which has been covered up by the Mill Addition since 1969) would also be removed. The more intact northern three-story office portion and its steel frame and glass curtain walls on the primary (north) and east façades would remain. Almost all of the Service Building's character-defining features are related to its primary (north) façade. Demolition of the portion of the Service Building south of the three-story office portion would remove some original material and alter the building's overall form and volume. The southern portion of the Service Building, however, contains few of the building's character-defining features and has been altered previously on multiple occasions, and its removal would not substantially reduce the overall integrity of the Primary Studio Complex. Under the Original Project, the southern wall of the Studio Building would be removed but it will remain intact under the Modified Project.

Like the Original Project, demolition associated with the Modified Project would not result in a substantial adverse change in the significance of any historical resource located on the Project Site or in the Project Site Vicinity through physical demolition, destruction, or relocation. Impacts associated with demolition would be less than significant as defined by CEQA.

6. POTENTIAL IMPACTS FROM REHABILITATION

Impacts from Rehabilitation

Similar to the Original Project, the Modified Project would rehabilitate the Primary Studio Complex. As discussed in the EIR, the integrity of the original Primary Studio Complex has been compromised by numerous alterations and additions constructed in the past after the period of significance.² These alterations expanded the original footprint and volume of the Primary Studio Complex, covered up and/or removed the east and west walls, and altered the roof of the Primary Studio Complex. Rehabilitation of the Primary Studio Complex would remove these non-historic additions and restore portions of the original Primary Studio Complex that are currently hidden or have been removed or altered.

² As concluded in the 2018 Historic Resource Assessment and the HCM nomination and designation, the Primary Studio Complex retains sufficient integrity to be eligible for historic listing in its current condition despite alterations since the period of significance.

Like the Original Project, the Modified Project would remove the non-historic Support Building addition on the west side of the Studio Building, which was constructed in 1976 and is not included as part of the HCM designation. Removal of the Support Building would restore the original dimensions and volume of the Studio Building and reveal the remaining portions of the Studio Building's original west wall, which has been concealed by the Support Building since 1976. Similar to the Original Project, any missing portions of the Studio Building's west wall would be rehabilitated save for a small portion up to approximately two bays wide, which would be removed to allow for an interior east-west passage through the Primary Studio Complex. In comparison to the Original Project, the Modified Project would preserve more of the Studio Building roof and the entire south exterior wall. In this regard, the Modified Project is an improvement from the Original Project.

Under the Original Project, portions of the roof of the Studio Building above the interior east-west passage would be removed to create a partial open-air corridor. The rear (south) façade of the Studio Building may also be removed and/or extended up to 20 feet south as part of the Original Project. Under the Modified Project, the Studio Building's roof and existing south wall will remain and the building will not be extended to the south. As such, more of the original volume of the Studio Building and its original fabric will be retained under the Modified Project.

Like the Original Project, the Modified Project would remove the Mill Addition on the east side of the Service Building, which would partially restore the original volume of the Service Building. The portion of the original Service Building south of its three-story office section, much of which has been altered previously on multiple occasions, would be removed under the Modified Project, as in the Original Project. The Original Project would replace the removed southern portion of the Service Building with new construction that would somewhat restore the Service Building to an approximation of its original form. The Modified Project will not include the same replacement construction but will instead close the remaining northern portion of the Service Building with a new wall. In this way, the area of removal will be clear. The northern three-story office portion and its steel-frame and glass curtain walls on the primary (north) and east façades would remain. As noted in the EIR, almost all of the Service Building's character-defining features are related to its primary (north) façade.

As analyzed in the EIR, rehabilitation of the Primary Studio Complex would result in an improved level of integrity in comparison to its current condition under the Original Project. After rehabilitation under the Modified Project, the Primary Studio Complex would exhibit a level of integrity superior to the level of integrity achieved under the Original Project.

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

Like the Original Project, the Primary Studio Complex would retain all of the character-defining features delineated in the HCM designation as a result of its rehabilitation under the Modified Project. The Modified Project would also retain and restore the majority of the overall form, massing, and configuration of the Primary Studio Complex.

As is true under the Original Project, rehabilitation of the Primary Studio Complex under the Modified Project would not materially alter in an adverse manner the physical characteristics that convey its historical significance. Thus, impacts from the rehabilitation of the Primary Studio Complex under the Modified Project would be less than significant as defined by CEQA.

Historic Structure Report

Like the Original Project, the Modified Project would also include a Historic Structure Report (HSR) as a Project Design Feature to guide the rehabilitation of the Primary Studio Complex in accordance with the Secretary of the Interior's Standards for Rehabilitation. The HSR would be completed prior to the development of the architectural and engineering plans for the rehabilitation. The HSR would thoroughly identify historic materials and character-defining features, provide documentary, graphic, and physical information about their existing conditions, and make recommendations for their treatment. The HSR would also address both changes to the buildings to suit new production techniques and modern amenities as well as their on-going maintenance after Project completion. The City of Los Angeles Office of Historic Resources (OHR) would use the HSR in reviewing Project plans and approving permits pursuant to the requirements of the Cultural Heritage Ordinance.

7. POTENTIAL IMPACTS FROM NEW CONSTRUCTION: PROJECT SITE

Like the Original Project, the Modified Project would include new construction on the Project Site, including: (1) a rooftop addition to the Studio Building; (2) new construction adjacent to the Primary Studio Complex; and (3) buildout of the Project Site. The extent of new construction associated with the Modified Project would be reduced in comparison to the Original Project. Potential impacts from new construction associated with the Modified Project are analyzed below.

Primary Studio Complex Rooftop Addition

Under the Original Project, any rooftop addition would consist of a single rectangular volume up to approximately 36 feet in height aligned east-west across the roof of the Primary Studio Complex. Any rooftop addition would be set back a minimum of 55 feet from the north façade of the Studio Building. This would set back any rooftop addition approximately 167 feet from the north façade of the Service Building.

Under the Modified Project, the rooftop addition would also consist of a single rectangular volume aligned east-west across the roof of the Studio Building but would be reduced to approximately 18 feet in height, half the height proposed by the Original Project. The rooftop addition under the Modified Project would be set back approximately 109 feet from the north façade of the Studio Building, a 54-foot increase in setback from that in the Original Project. This would set back the rooftop addition approximately 228 feet from the north façade of the Service Building.

The approximately 109-foot setback of the rooftop addition under the Modified Project places its volume further south than that of the Original Project, further reducing the visibility of the rooftop addition when viewed from the north. In comparison to the Original Project, the Modified Project would reduce the overall height of the rooftop addition from approximately 36 feet to approximately 18 feet, reduce the rooftop addition length from approximately 340 feet

to approximately 200 feet, and reduce the rooftop addition width reduced from approximately 92 feet to approximately 80 feet. The rooftop addition will be reduced from approximately 30,600 square feet under the Original Project to approximately 16,000 square feet under the Modified Project. The reduced size and increased setback would further ensure that the rooftop addition is visually subordinate in scale to the Primary Studio Complex, particularly when viewed looking south from Beverly Boulevard, and would not materially alter the Primary Studio Complex's proportions and profile or negatively impact its historic character.

As with the Original Project, the rooftop addition under the Modified Project would be constructed as a separate and distinct volume supported by structural columns that are independent of the structural system and envelope of the Primary Studio Complex. If the rooftop addition is removed in the future, structural support would be engineered so that the rooftop addition could be removed without impairment to the Primary Studio Complex and the essential form and integrity of the Primary Studio Complex would be retained.

In summary, the rooftop addition under the Modified Project would be subordinate in size and scale to the Primary Studio Complex. It would also be set back from the primary (north) façade of the Primary Studio Complex to further reduce its visual presence when viewed from the north. The rectangular form of the rooftop addition would also be compatible with the International Style architecture of the Primary Studio Complex so that the overall form, massing, and configuration of the Primary Studio Complex would not be adversely affected. In addition, the rooftop addition would comply with the Project Parameters (Project Design Feature CUL-PDF-1).

For these reasons, the rooftop addition under the Modified Project would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the Primary Studio Complex. Thus, impacts from the construction of the rooftop addition under the Modified Project would be less than significant as defined by CEQA. The Modified Project would not result in a new significant impact or an increase in the severity of a previously disclosed impact in the EIR.

Studio Building Rear (South) Wall

The Original Project proposed an addition to the rear (south) façade of the Studio Building to slightly expand the size of the existing studio spaces. Construction of the addition would have required the removal of much of the Studio Building's south wall. The Studio Building's south façade was previously altered by a non-historic addition that was added to the eastern portion of the south façade after the period of significance. Like the Original Project, the Modified Project would remove the non-historic addition; its removal would not adversely affect the historical significance or integrity of the Studio Building. There would be no rear addition to the Studio Building under the Modified Project and the south wall of the Studio Building would remain intact. As with the Original Project, the Modified Project would have a less than significant impact under CEQA. The Modified Project would not result in a new significant impact or an increase in the severity of a previously disclosed impact in the EIR.

Primary Studio Complex: Adjacent New Construction

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

Under the Original Project, any portion of the East Building rising higher than the height of the Service Building would be set back southerly from the north façade of the Service Building by a minimum of approximately 60 feet, which would allow the full articulation of the Service Building’s three-story office portion and its steel frame and glass curtain walls to be revealed when viewed from the northeast.

Similarly, under the Original Project, any portion of the West Building rising higher than the Service Building would be set back southerly from the north façade of the Service Building by a minimum of approximately 150 feet. This would allow the currently obstructed west wall of the Studio Building, which would be restored, to become fully visible.

Under the Modified Project, the East Building would remain and have the same potential height of up to 225 feet above Project Grade. The overall size of the East Building, however, would be substantially reduced in comparison to the Original Project. As with the Original Project, any portion of the East Building rising higher than the height of the Service Building would be set back southerly from the north façade of the Service Building by a minimum of approximately 60 feet. Physical separation of the East Building from the Primary Studio Complex under the Modified Project would be approximately 30 feet, twice the distance anticipated under the Original Project. Small bridges would provide pedestrian access from the East Building to the Primary Studio Complex and the rooftop addition as with the Original Project. Like the Original Project, the bulk and mass of the East Building under the Modified Project would be concentrated towards the south, away from the primary (north) façade of the Primary Studio Complex, thereby ensuring that the Primary Studio Complex retains its visual prominence.

The West Building proposed under the Original Project would not be constructed under the Modified Project. Adjacent new construction west of the Primary Studio Complex would maintain an approximately 50-foot distance, an increase of 25 feet from the distance proposed by the Original Project. With the elimination of the West Building and the increase of distance between the Primary Studio Complex and new construction to the west, the currently obstructed west wall of the Studio Building, which would be restored, would become even more visible under the Modified Project in comparison to the Original Project. Adjacent new construction west of the Primary Studio Complex would be subject to a base height limit of 88 feet and a maximum height limit of 145 feet in up to 40% of the Subarea C area.

As with the Original Project, new construction to the east and west of the Primary Studio Complex would not destroy any historic materials or features that characterize the Primary

Studio Complex under the Modified Project. After buildout of the Modified Project, the distinctive form and design of the Primary Studio Complex would remain intact, and its architectural features would remain visible. For these reasons, new construction adjacent to the Primary Studio Complex would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the Primary Studio Complex. Thus, impacts from new construction adjacent to the Primary Studio Complex under the Modified Project would be less than significant as defined by CEQA. The Modified Project would not result in a new significant impact or an increase in the severity of a previously disclosed impact in the EIR.

Project Site Buildout

The Original Project would permit a total of approximately 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, landscaping, parking and open space. This includes both new development and the existing uses to be retained. The Modified Project would permit a total of approximately 1,724,000 square feet (a reduction of 150,000 square feet of floor area) of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout.

Like the Original Project, buildout of the Modified Project would alter the immediate surroundings of the Primary Studio Complex by adding new construction to the Project Site, replacing existing buildings and expanses of surface parking. The immediate surroundings of the Primary Studio Complex, however, have already been substantially altered since the period of significance for the Primary Studio Complex (1952-1963).

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

Similar to the Original Project, the Modified Project would open up the currently obstructed views of the Primary Studio Complex from Beverly Boulevard, thereby restoring an important character-defining viewshed feature that has been compromised in the past. In addition, the Modified Project does not include any single-story bungalows constructed between Beverly Boulevard and the Primary Studio Complex; rather, the Modified Project includes three bungalows in the lower plaza level north of the Primary Studio Complex, thereby ensuring they remain below the sightline to the Primary Studio Complex from Beverly Boulevard.

Like the Original Project, the Modified Project would not result in a substantial adverse change in the significance of the Primary Studio Complex by altering its immediate surroundings. Thus, impacts to the Primary Studio Complex from Project Site buildout would be less than significant as defined by CEQA. The Modified Project would not result in a new significant impact or an increase in the severity of a previously disclosed impact in the EIR.

Signage

The Historic Sign Guidelines included with the Original Project would also be included with the Modified Project. Historic Sign Guidelines for on-site signage have been prepared by Architectural Resources Group to ensure that all exterior signs located on the Primary Studio Complex and within the Viewshed Restoration Area comply with the Secretary of the Interior's Standards for Rehabilitation. As such, these guidelines would ensure that any future sign design or modification associated with the Primary Studio Complex would not result in adverse changes to the historical significance and integrity of the Primary Studio Complex.

Like the Original Project, the Modified Project also anticipates additional signage associated with new construction outside the Primary Studio Complex and Viewshed Restoration Area. The anticipated signage would be affixed to new construction only and would not physically alter the Primary Studio Complex. The addition of new signage does not include the demolition, relocation, rehabilitation, alteration or conversion of the Primary Studio Complex which would remain intact in its current location and would not be materially altered by new signage located on the proposed new construction. The Primary Studio Complex would remain intact and continue to convey its historical significance. For these reasons, the historical significance and integrity of the Primary Studio Complex would not be materially impaired by the Modified Project and the proposed new signage would result in less than significant impacts to the Primary Studio Complex. The Modified Project would not result in a new significant impact or an increase in the severity of a previously disclosed impact in the EIR.

8. INTEGRITY ANALYSIS

Historic *integrity* is the threshold used to analyze impacts to historical resources under CEQA and is defined as the ability of a historical resource to convey its historic significance. The National Park Service defines seven aspects of integrity: *location, design, setting, materials, workmanship, feeling, and association*. The CEQA Guidelines state that “[t]he significance of an historical resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance....”³ Therefore, maintaining sufficient integrity so that a historical resource continues to convey its significance is a threshold question for the CEQA impact analysis.

The integrity of the Primary Studio Complex after implementation of Original Project was analyzed in the EIR. That analysis found that the Primary Studio Complex would retain most of the aspects of integrity, including *location, design, materials, workmanship* and *association*. The EIR analysis acknowledged that integrity of *setting* has been lost over time prior to the designation of the Primary Studio Complex as an HCM, and integrity of *feeling* would be compromised by the Original Project. However, the Primary Studio Complex would continue to convey its overall historic character, appearance, and association with its historical period after implementation of the Project.

Because the Modified Project represents a reduced version of the Original Project, analysis of the integrity of the Primary Studio Complex after implementation of the Modified Project is

³ CEQA Guidelines, Section 15064.5(b)(2).

largely the same. This section analyzes the integrity of the Primary Studio Complex after implementation of the Modified Project using the seven aspects of integrity.

Location: *the place where the historic property was constructed or the place where the historic event occurred.*

The Primary Studio Complex would remain in its original location after implementation of the Modified Project and would, therefore, retain integrity of *location*.

Design: *the combination of elements that create the form, plan, space, structure, and style of a property.*

The Modified Project would rehabilitate the Primary Studio Complex, retaining and restoring more original fabric than what would be retained under the Original Project. The overall form, massing, and configuration of the Primary Studio Complex would be retained and further restored closer to its original appearance through the removal of non-historic additions after the period of significance and the restoration of the original west wall of the Studio Building. All of the character-defining features of the HCM as set forth in the 2018 Historic Resource Assessment and the HCM designation would be retained and restored.

The Modified Project, like the Original Project, would remove the rear (southern) portion of the Service Building. The Modified Project would also construct a rooftop addition to the Studio Building that would be half the height (approximately 18 feet) of the rooftop addition anticipated by the Original Project. The rooftop addition in the Modified Project would be set back further from the north façade of the Studio Building (approximately 109 feet) from that specified in the Original Project (approximately 55 feet).

These changes would somewhat alter the original plan and massing of the Primary Studio Complex. Despite these alterations, rehabilitation of the Primary Studio Complex would restore much of the original form that has been hidden by non-historic additions, revealing more of the original form, massing, and configuration of the Primary Studio Complex than is currently discernible. The International Style of the Primary Studio Complex would be retained and improved by the rehabilitation and the new construction would be compatible with the International Style. Therefore, the Primary Studio Complex would retain integrity of *design*.

Setting: *the physical environment of a historic property.*

As analyzed in the EIR, the immediate surroundings of the Primary Studio Complex have been altered since the period of significance for the Primary Studio Complex (1952-1963). These changes over time have substantially changed the physical environment of the Primary Studio Complex such that it no longer contributes to the historical significance or integrity of the Primary Studio Complex. Therefore, integrity of *setting* has been substantially compromised prior to implementation of the Modified Project. Therefore, integrity of *setting* for the Primary Studio Complex would remain compromised as previously identified.

Materials: *the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.*

The Primary Studio Complex would retain the majority of its materials, including but not limited to concrete walls and entry bridge, steel framing, concrete panel and corrugated steel cladding, smooth stucco, glass and steel curtain walls, metal railings, and angled fin and “X” supports, after implementation of the Modified Project. The Modified Project would also retain the roof and south wall of the Studio Building which would not be completely retained under the Original Project.

Like the Original Project, the Modified Project would remove some original materials including portions of the exterior walls and roof of the Service Building. However, the Modified Project would also restore and reveal original materials that have been removed or concealed by previous alterations or additions to the Primary Studio Complex after the period of significance, including the rehabilitation of the west wall of the Studio Building which was partially demolished and covered up in 1976 with the construction of the Support Building addition. Balancing the alterations that would be made as part of the Modified Project with the restoration and rehabilitation of the Primary Studio Complex, the Primary Studio Complex would retain integrity of *materials*.

Workmanship: *the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.*

As with the Original Project, the Modified Project would preserve the original workmanship of the Primary Studio Complex during the rehabilitation of the Primary Studio Complex. The original workmanship is evident through the overall construction method and materials, as well as elements like the exterior concourse, with metal pipe railing and fins; the entrance bridge, with a corrugated metal roof and planters and metal pipe supports; the large glass curtain walls; and concrete *pilotis*. Through the preservation of the original construction methods, materials and features, the physical evidence of technological practices and aesthetic principles from the original period of development between 1952 and 1963 would be conveyed. Because these features would be preserved and restored as part of the Modified Project, the Primary Studio Complex would retain integrity of *workmanship*.

Feeling: *a property's expression of the aesthetic or historic sense of a particular period of time.*

Rehabilitation of the Primary Studio Complex would preserve and restore the overall design, materials, and workmanship that reflect the property's origin as a 1950s industrial plant purpose-built for television production. New construction associated with the Modified Project would introduce one flanking building (East Building) adjacent to the Primary Studio Complex. While this is one less building than the two flanking buildings anticipated in the Original Project, construction of the East Building would still change the Primary Studio Complex from a relatively isolated, stand-alone complex to one of a grouping of buildings of varying heights. This would alter the historically stand-alone character of the Primary Studio Complex, compromising its

sense of a particular time. Therefore, the Primary Studio Complex would not retain integrity of *feeling*.

Association: *the direct link between an important historic event or person and a historic property.*

The Primary Studio Complex has been used as a television production facility since its construction in 1952. The Modified Project would rehabilitate the majority of the original plan, form, massing, and design of the Primary Studio Complex as well as materials and features so that it remains clearly recognizable as production facility from the 1950s. The Primary Studio Complex's striking form and design also became a recognizable symbol for CBS during its longtime occupation of the property, and the preservation of the Primary Studio Complex would maintain the association with CBS, for whom it was originally constructed.

After implementation of the Modified Project, the Primary Studio Complex would retain its original form, massing, and configuration, and all of its important physical character-defining features that convey its important historic associations with television production. Therefore, the resource retains integrity of *association*.

Summary of Integrity

According to National Park Service guidance, "to retain historic integrity a property would always possess several, and usually most, of the [seven] aspects" of integrity.⁴ As with the Original Project, the Primary Studio Complex would retain all but two of the seven aspects of integrity, including *location*, *design*, *materials*, *workmanship* and *association* after implementation of the Modified Project. Integrity of *setting* has been lost over time, and integrity of *feeling* would be compromised by the Modified Project. However, the Primary Studio Complex would still be able to convey its overall historic character, appearance, and association with its historical period when it became the first large-scale, purpose-built television facility.

The Modified Project will retain more historic fabric than the amount retained under the Original Project. After implementation of the Modified Project, the Primary Studio Complex would retain sufficient integrity to convey its significance, a higher level of integrity than that retained by the Original Project. As such, the Primary Studio Complex would remain eligible for designation as an HCM and for listing in the National Register and the California Register. Thus, the Modified Project would not result in a substantial adverse change in the significance of the Primary Studio Complex, and impacts would be less than significant as defined by CEQA.

9. ANALYSIS OF THE MODIFIED PROJECT FOR CONFORMANCE WITH THE SECRETARY OF THE INTERIOR'S STANDARDS

Because the Primary Studio Complex has been designated as an HCM, any substantial alteration must comply with the Rehabilitation Standards, consistent with Section 22.171.14 of the Cultural Heritage Ordinance. This section analyzes the Modified Project for conformance with the Rehabilitation Standards. Compliance will ultimately be based on the construction

⁴ *National Register Bulletin 15.*

documents reviewed by OHR prior to the issuance of a building permit.

Standard 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.

The Primary Studio Complex was originally constructed as a television production studio, and the Modified Project would continue the existing studio use. Media production needs and technologies have changed since the construction of the Primary Studio Complex, and the proposed rehabilitation would include some repairs and alterations to the Primary Studio Complex to accommodate modern production requirements and provide for a viable, adaptable studio use that is able to meet anticipated future production demands. Maintaining the existing use of the Primary Studio Complex would require fewer changes than adapting the Primary Studio Complex to a new use. The Primary Studio Complex would retain its original location, concrete and steel construction, the majority of its original plan and massing and all of its character-defining features after implementation of the Modified Project.

The Primary Studio Complex will be used for media production, continuing its historic use as a television production studio, and distinctive materials and features will be preserved by the Modified Project. Thus, the Modified Project would comply with Standard 1.

Standard 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.

The Modified Project would retain and restore the overall form, massing, and configuration of the Primary Studio Complex. Removal of the 1976 Support Building would restore the original dimensions and volume of the Studio Building and reveal the currently obstructed remaining portions of the original west wall of the Studio Building. Any portions of the west wall that have previously been removed would be rehabilitated, and up to two bays of the west wall may be removed to allow for an interior east-west passage through the Primary Studio Complex. Overall, the original volume of the Studio Building would be restored, and the original materials that have been hidden for decades would be revealed and restored.

The Modified Project would remove the 1969 Mill Addition, thereby revealing more of the original volume of the Service Building. The southern portion of the Service Building, much of which has been altered previously on multiple occasions, would be removed as part of the rehabilitation of the Primary Studio Complex. A small single-story volume on the eastern facade of the Service Building (which has been covered up by the Mill Addition since 1969) would also be removed. The northern three-story office portion of the Service Building and its steel frame and glass curtain walls on the primary (north) and east façades would be retained. Importantly, almost all of the Service Building's character-defining features are related to its primary (north) façade. Although portions of the Service Building would be removed as part of the Modified Project, the primary (north) façades of both the Service Building and the Studio Building would be retained, restored, and rehabilitated, which would preserve the existing character-defining features of the Primary Studio Complex and restore those character-defining features that have been compromised in the past.

After rehabilitation under the Modified Project, the Primary Studio Complex would exhibit an improved level of integrity in comparison to its integrity under the current condition. Additions and alterations that were constructed after the period of significance and have reduced the overall integrity of the Primary Studio Complex would be removed. The original form, massing and configuration of the Primary Studio Complex would largely be restored, and all of its character-defining features will be retained and rehabilitated.

Despite some alteration of the Primary Studio Complex's original features and materials, much of the distinctive materials, features, spaces, and spatial relationships that characterize the Primary Studio Complex would be preserved and restored, and most of the material that would be removed as part of the rehabilitation of the Primary Studio Complex is non-original and not included as part of the HCM designation. Further, the Modified Project would remove non-original alterations and additions to the Primary Studio Complex that have diminished its integrity and character. Thus, the Modified Project would comply with Standard 2.

Standard 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.

The Modified Project would not add any new features to the Primary Studio Complex that would create a false sense of historical development. Any new features would be designed to be perceived as separate and distinct elements rather than as an integrated extension of the Primary Studio Complex to ensure that the original composition of the Primary Studio Complex remains apparent. As discussed in more detail under Standard 9, all new features would be compatible but differentiated from the Primary Studio Complex. Thus, the Modified Project would comply with Standard 3.

Standard 4: Changes to a property that have acquired significance in their own right will be retained and preserved.

The period of significance for the Primary Studio Complex has been defined as 1952-1963, and those elements of the Primary Studio Complex that were constructed during the period of significance would be retained and preserved. Changes to the Primary Studio Complex after 1963 are not included as part of the HCM designation and have not acquired significance in their own right. These non-historic additions, including the 1969 Mill Addition, the 1976 Support Building and numerous smaller additions on the south façade of the Studio Building and roof of the Service Building, would be removed in order to restore the Primary Studio Complex's character-defining features and retain the overall form and appearance of the Primary Studio Complex. Thus, the Modified Project would comply with Standard 4.

Standard 5: Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

Preservation of the materials, features, finishes, techniques, and craftsmanship that characterize the Primary Studio Complex is a stated objective of the Modified Project. Character-defining features to be preserved include but are not limited to the articulated

ground floor set back behind *pilotis*; exterior concourses with railings and angled fin stanchions; central concrete entry bridge with walls, planters, railing, canopy, and metal "X" supports; glass curtain wall at north and east facades of the Service Building; projecting planters and shed roof canopy at the exterior of entry lobby; concrete panel and corrugated steel cladding; black and white color scheme with red accents; the wall-mounted signage at the corners of the Service Building; and CBS logo tiles in the main entry lobby and continuing along the south wall of the entrance hallway immediately east of the lobby. The Modified Project will also reveal and restore the west wall of the Studio Building which has been covered by the Support Building addition constructed in 1976.

To support this effort, the Applicant will prepare an HSR that will guide rehabilitation of the Primary Studio Complex in compliance with the Rehabilitation Standards. The HSR will thoroughly document and evaluate the existing conditions of the character-defining features of the Primary Studio Complex, evaluate material deterioration, and make recommendations for their treatment. Material treatments will be overseen by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards for Architecture or Historic Architecture.

The distinctive materials, features, finishes, techniques, and craftsmanship of the Primary Studio Complex will be thoroughly catalogued, evaluated, appropriately treated and preserved by the Modified Project. Thus, the Modified Project would comply with Standard 5.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

As noted above, the Applicant will prepare an HSR to guide the rehabilitation of the Primary Studio Complex in compliance with the Rehabilitation Standards. The HSR will thoroughly document and evaluate the existing conditions of the character-defining features of the Primary Studio Complex, evaluate material deterioration, and make recommendations for their treatment. Where feasible, deteriorated historic features of the Primary Studio Complex would be repaired in accordance with applicable Department of the Interior guidance. In those instances where the severity of deterioration would require replacement, the new feature would match the old in design, color, texture, and, where possible, materials. Any replacement of missing features would be substantiated by documentary evidence provided in the HSR and/or physical evidence available on-site. Thus, the Modified Project would comply with Standard 6.

Standard 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.

As noted above, the Applicant will prepare an HSR to guide the rehabilitation of the Primary Studio Complex in compliance with the Rehabilitation Standards. The HSR will thoroughly document and evaluate the existing conditions of the character-defining features of the Primary Studio Complex, evaluate material deterioration, and make recommendations for their

treatment. Any chemical or physical treatments deemed necessary for the repair and restoration of historic materials and features would be conducted in accordance with applicable Department of the Interior guidance using the gentlest means possible. No treatments that cause damage to historic materials would be used in the rehabilitation of the Primary Studio Complex. Thus, the Modified Project would comply with Standard 7.

Standard 8: Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Potential impacts to archaeological resources were analyzed in Section IV.B, Cultural Resources, of the Draft EIR for the Original Project. As discussed therein, no archaeological resources have been previously recorded within the Project Site. Further, impacts to any unidentified archaeological resources during construction would be less than significant with mitigation. In the event of discovery of archaeological resources during construction, Mitigation Measure CUL-MM-1 would ensure that the resource would not be adversely affected. Thus, the Project would comply with Standard 8.

Standard 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.

The Modified Project would include a rooftop addition above the Primary Studio Complex that would be both lower in height and further set back to the south of the north façade of the Studio Building than the rooftop addition in the Original Project. Unlike the Original Project, which included the West and East Buildings, the Modified Project would only include the East Building adjacent to the east end of the Primary Studio Complex.

The rooftop addition in the Modified Project would be substantially smaller in height, length, and width in comparison to that allowed in the Original Project. This smaller scale (approximately 16,000 square feet instead of approximately 30,600 square feet) will ensure the rooftop addition is subordinate in size and scale to the Primary Studio Complex.

It would also be set back from the primary (north) façade of the Primary Studio Complex to further reduce its visual presence when viewed from the north. The rectangular form of the rooftop addition would also be compatible with the International Style architecture of the Primary Studio Complex so that the overall form, massing, and configuration of the Primary Studio Complex would not be adversely affected.

The Modified Project would also include the construction of one building (East Building) adjacent to the Primary Studio Complex to the east. The East Building would have a potential height of up to 225 feet above Project Grade and be physically separated from the Primary Studio Complex by approximately 30 feet. Any portion of the East Building rising higher than the height of the Service Building would be set back southerly from the north façade of the Service Building by approximately 60 feet, which would allow the full articulation of the Service Building's three-story office portion and its steel frame and glass curtain walls to be revealed

when viewed from the northeast. The simple, rectangular massing of the East Building would provide a deferential backdrop to the Primary Studio Complex in order to be compatible with the Primary Studio Complex. Overall, the bulk and mass of the East Building would be concentrated towards the south, away from the primary (north) façade of the Primary Studio Complex, thereby ensuring that the Primary Studio Complex retains its visual prominence.

The Modified Project also includes the construction of small one-story structures within the Viewshed Restoration Area, which would be located in the lower plaza level north of the Primary Studio Complex so that it sits below the site line from Beverly Boulevard to the Primary Studio Complex.

Construction of the rooftop addition, East Building, and small bungalows would not destroy any historic materials, features, or spatial relationships that characterize the Primary Studio Complex. New additions would be differentiated from the Primary Studio Complex and would be compatible with the historic materials, features, size, scale and proportion, and massing of the Primary Studio Complex. Thus, the Modified Project would comply with Standard 9.

Standard 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.

The rooftop addition in the Modified Project would be constructed as a separate and distinct volume supported by structural columns that are independent of the structural system and envelope of the Primary Studio Complex. If any rooftop addition is removed in the future, structural support would be engineered so that the rooftop addition could be removed without impairment to the Primary Studio Complex, and the essential form and integrity of the Primary Studio Complex would be retained.

In addition, the East Building would be constructed as a distinct building physically separated from the Primary Studio Complex by approximately 30 feet. The East Building could be removed in the future without impairment to the Primary Studio Complex.

While it is highly unlikely that any new construction would be removed in the future, conceptually all proposed additions or related new construction to the Primary Studio Complex could be removed without impairment to the Primary Studio Complex, and the essential form and integrity of the Primary Studio Complex would be retained. Thus, the Modified Project would comply with Standard 10.

10. POTENTIAL IMPACTS TO HISTORICAL RESOURCES IN THE PROJECT SITE VICINITY

Potential impacts to historical resources in the Project Site Vicinity were analyzed in the EIR. The EIR analyzed the following historical resources:

- The Original Farmers Market (6333 W. 3rd Street)
- Rancho La Brea Adobe (6301 W. 3rd Street)
- Chase Bank (312 N. Fairfax Avenue)

- Fairfax Theatre (7901-7909 W. Beverly Boulevard)
- Air Raid Siren No. 25

The EIR analysis determined that the Original Project would not include the demolition, relocation, rehabilitation, alteration or conversion of any of these resources and would not result in adverse impacts. All five resources would remain intact and continue to convey their historical significance after implementation of the Original Project and their historical significance and integrity would not be materially impaired.

Because the Modified Project represents a reduced version of the Original Project that would remain contained within the Project Site, analysis of potential impacts from the Modified Project to historical resources in the Project Site Vicinity would be the same. The Modified Project would not include the demolition, relocation, rehabilitation, alteration, or conversion of the five historical resources listed above and would not result in adverse impacts to any of the five resources. Similarly, the Modified Project would not alter the surroundings of the five historical resources such that their immediate setting would be adversely affected. All five historical resources would remain intact and continue to convey their historical significance after implementation of the Modified Project, and their historical significance and integrity would not be materially impaired.

After implementation of the Modified Project, the five historical resources listed above would retain their eligibility for historic listing and the Modified Project would, therefore, not result in adverse impacts to historical resources in the Project Site Vicinity, and the potential impact would be less than significant. The Modified Project would not result in a new significant impact or an increase in the severity of a previously disclosed impact in the EIR.

11. CUMULATIVE IMPACTS ANALYSIS

Cumulative impacts may occur if the Modified Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type or significant within the same context as the one within the Project Site. A significant cumulative impact associated with the Modified Project and related projects would occur if the combined impact of the Modified Project and related projects would materially and adversely alter those physical characteristics that convey the significance of a historical resource and that justify its listing, or eligibility for listing, as a historical resource. The EIR identifies 68 related projects for the assessment of potential cumulative impacts.

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

- **Related Project 1** involves the construction of a mixed-use building located at 7901 Beverly Boulevard on the northwest corner of Beverly Boulevard and Fairfax Avenue. Related Project 1 is located approximately 105 feet from the northwest corner of the

Project Site and approximately 545 feet from the northwest corner of the Primary Studio Complex.

- **Related Project 4** involves the construction of a three-story office building for Jewish Family Service located at 320 Fairfax Avenue, which is located mid-block on the east side of Fairfax Avenue between Beverly Boulevard and Oakwood Avenue. Related Project 4 is located approximately 290 feet from the northwest corner of the Project Site and approximately 690 feet from the northwest corner of the Primary Studio Complex.
- **Related Project 11** involves the construction of a five-story, mixed-use, multi-family housing and retail building located at 7951 Beverly Boulevard two blocks west of the Project Site. Related Project 11 is located approximately 440 feet from the northwest corner of the Project Site and approximately 795 feet from the northwest corner of the Primary Studio Complex.

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

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

Related Project 1 involves the demolition of the Fairfax Theatre building and the construction of a new mixed-use building. Related Project 1 is located northwest of the Project Site on the northwest corner of Beverly Boulevard and Fairfax Avenue. Related Project 1 does not include the demolition, relocation, rehabilitation, alteration, or conversion of the Primary Studio Complex. The Primary Studio Complex would remain unchanged after implementation of Related Project 1 and Related Project 1 would not result in adverse impacts to the Primary Studio Complex.

The Fairfax Theatre building meets the definition of a historical resource under CEQA and its demolition by Related Project 1 would, therefore, result in a significant impact to a historical resource. Constructed in the Art Deco architectural style, the Fairfax Theatre is historically significant as a rare remaining example of a neighborhood theater from the 1930s and for its associations with the Jewish community in the Beverly-Fairfax neighborhood. Unlike the Primary Studio Complex, the Fairfax Theatre has no important associations with the television industry and is not a property type that is significant within the context of the television industry. Further, the Art Deco-style Fairfax Theatre building has no association with International Style architecture or the work of Pereira & Luckman. As such, the Fairfax Theatre building is a different property type than the Primary Studio Complex and is significant under a

separate and distinct historic context. Because the Modified Project would not materially impair the Fairfax Theatre building or its immediate setting, as discussed above, the Project would not result in any additional impacts beyond those associated with Related Project 1 that would be cumulatively considerable.

Related Project 4 involved the construction of a three-story office building for Jewish Family Service located at 320 Fairfax Avenue, which was completed in 2020. As noted above, Related Project 4 is located approximately 290 feet from the northwest corner of the Project Site and even farther from the Primary Studio Complex (approximately 690 feet), and there are multiple buildings located in between Related Project 4 and the Project Site. Related Project 4 does not include the demolition, relocation, rehabilitation, alteration, or conversion of the Primary Studio Complex. The Primary Studio Complex would remain unchanged after implementation of Related Project 4, and Related Project 4 would not result in adverse impacts to the Primary Studio Complex. Related Project 4 did not involve the demolition, relocation, rehabilitation, alteration, or conversion of any historical resource; environmental review for Related Project 4 determined that impacts to cultural resources, including historical resources, would be less than significant.⁵ Because Related Project 4 had a less than significant impact on historical resources, and the Modified Project would not result in any additional impacts to historical resources either on the Project Site or in the Project Site Vicinity, the Modified Project would not result in any additional impacts that would be cumulatively considerable.

Related Project 11 involves the construction of a five-story, mixed-use, multi-family and retail building located at 7951 Beverly Boulevard. As noted above, Related Project 11 is located approximately 440 feet from the northwest corner of the Project Site and even farther from the Primary Studio Complex (approximately 795 feet), and there are multiple buildings located in between Related Project 11 and the Project Site. Related Project 11 does not include the demolition, relocation, rehabilitation, alteration, or conversion of the Primary Studio Complex. The Primary Studio Complex would remain unchanged after implementation of Related Project 11, and Related Project 11 would not result in adverse impacts to the Primary Studio Complex. Related Project 11 would not involve the demolition, relocation, rehabilitation, alteration, or conversion of any historical resource. The City's environmental review of Related Project 11 determined that there would be no impacts to historical resources.⁶ Because Related Project 11 would not result in any impacts to historical resources, and the Modified Project would not result in any additional impacts to historical resources either on the Project Site or in the Project Site Vicinity, the Modified Project would not result in any additional impacts that would be cumulatively considerable.

Each of the related projects was studied and, if necessary, mitigate any impacts on the integrity or significance of surrounding historical resources. Even if the related projects would result in significant impacts on a historical resource, the Modified Project's cumulative impact to historical resources would remain less than significant. For these reasons, the Modified 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 historical significance or integrity of any historical resource; therefore, cumulative impacts in this regard would be less

⁵ Case No. ENV-2015-868-MND.

⁶ Case No. ENV-2018-7383-CE.

than significant. The Modified Project would not result in a new significant impact or an increase in the severity of a previously disclosed impact in the EIR.

12. CONCLUSIONS

The Modified Project would not result in a substantial adverse change in the significance of any historical resources located on the Project Site or in the Project Site Vicinity through physical demolition, destruction, or relocation. Impacts associated with demolition would be less than significant as defined by CEQA.⁷

The Modified Project would retain, restore, and rehabilitate the majority of the existing original exterior walls and roof of the Primary Studio Complex as compared to existing conditions. The overall form, massing, and configuration of the Primary Studio Complex would be retained and rehabilitated closer to its original appearance during its period of significance, and all of its character-defining features would be retained and restored. For these reasons, impacts from the rehabilitation of the Primary Studio Complex would be less than significant as defined by CEQA.

The proposed rooftop addition would be subordinate in size and scale to the Primary Studio Complex and would be set back from the primary (north) façade of the Primary Studio Complex to further reduce its visual presence when viewed from the north. The rectangular form of the rooftop addition would also be compatible with the International Style architecture of the Primary Studio Complex so that the overall form, massing, and configuration of the Primary Studio Complex would not be adversely affected. For these reasons, impacts from the construction of the rooftop addition would be less than significant as defined by CEQA.

Construction of the East Building would not destroy historic materials or features that characterize the Primary Studio Complex. After Modified Project buildout, the distinctive form and design of the Primary Studio Complex would remain intact, and its character-defining features would be retained. For these reasons, impacts from new construction adjacent to the Primary Studio Complex would be less than significant as defined by CEQA.

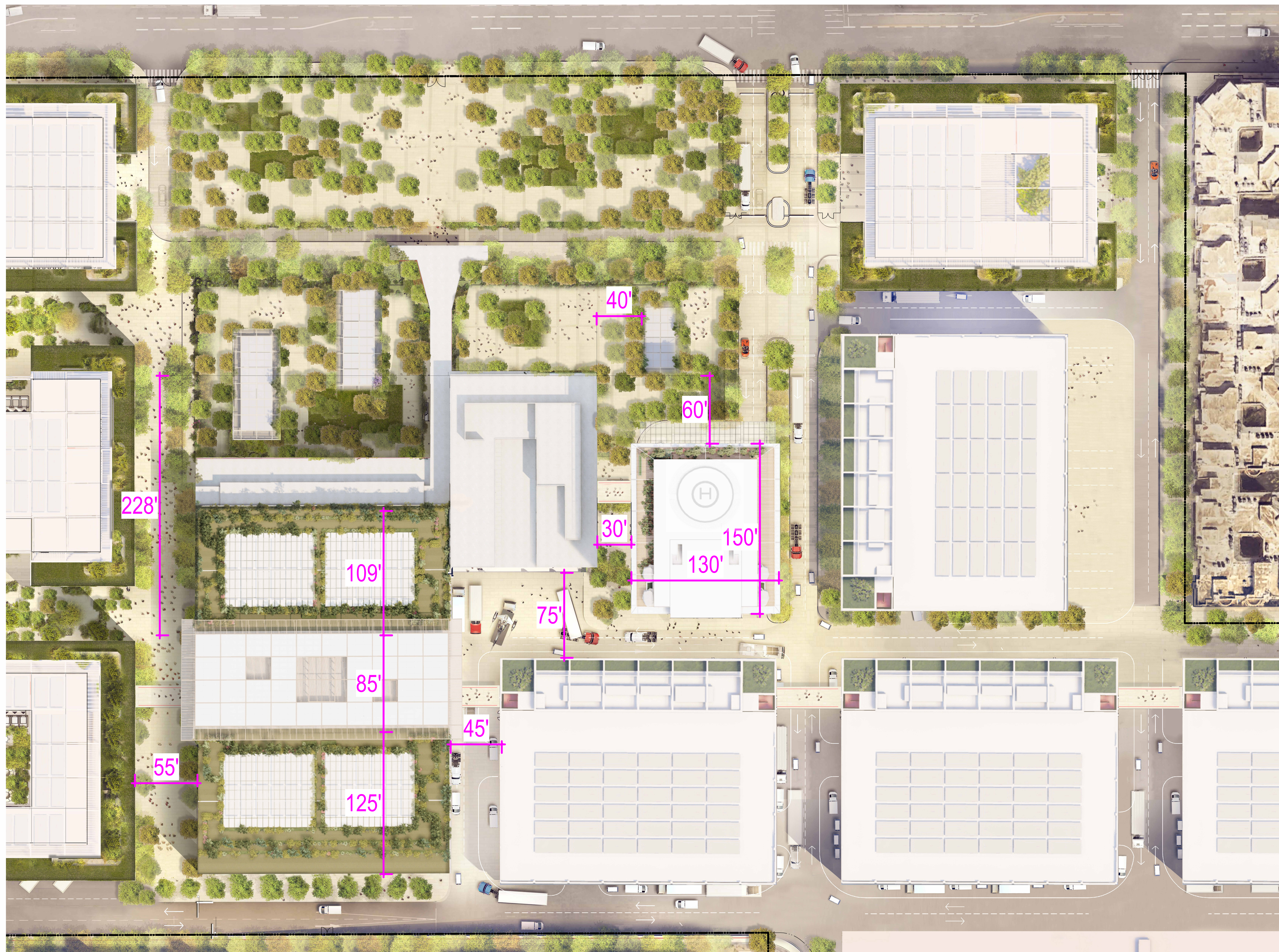
The Modified Project would include the construction of new buildings and structures on the Project Site, replacing certain existing buildings and structures and expanses of surface parking. Other than the Primary Studio Complex, all of the existing buildings and structures on the Project Site were constructed after the period of significance for the Primary Studio Complex (1952-1963). Therefore, Project Site buildout would not materially impair the historical significance and integrity of the Primary Studio Complex. In addition, the Project would include more visually transparent fencing at the northern perimeter and height restrictions between Beverly Boulevard and the Primary Studio Complex so that currently obstructed views of the Primary Studio Complex are restored. In addition to the viewshed protections afforded in the Original Project, the Modified Project also limits the location of any single-story bungalows

⁷ The thresholds of significance used to determine whether the Modified Project would cause a new significant impact in the area of historical resources or substantially increase the severity of a significant impact already identified in the EIR, are provided in Erratum No. 1 to the Environmental Impact Report. Those thresholds of significance were used in reaching the conclusion in this report that the Modified Project would not cause a new significant impact in the area of historical resources or substantially increase the severity of a significant impact already identified in the EIR.

constructed between Beverly Boulevard and the Primary Studio Complex to the lower plaza level north of the Primary Studio Complex to ensure they remain below the sightline to the Primary Studio Complex from Beverly Boulevard. For these reasons, impacts to the Primary Studio Complex from buildout of the Modified Project would be less than significant as defined by CEQA.

In addition, the Modified Project does not include the demolition, relocation, rehabilitation, alteration or conversion of any historical resources located outside the Project Site. All of the historical resources in the Project Site Vicinity would remain unchanged after implementation of the Modified Project and the Modified Project would not result in adverse impacts to any historical resources located in the Project Site Vicinity. Finally, the Modified Project in combination with the identified related projects would not materially alter the significance of historical resources or have a cumulatively considerable impact on the historical significance or integrity of any historical resource; therefore, cumulative impacts in this regard would be less than significant.

In summary, the Modified Project would not result in an adverse change to the integrity or significance of the Primary Studio Complex or any historical resources located in the Project Site Vicinity. Therefore, impacts on historical resources would be less than significant as defined by CEQA.



HCM Adjacent Development Dimensions