IV. Environmental Impact Analysis

D. Historic Resources

1. Introduction

This section of the Draft EIR focuses on the Proposed Project’s impacts on historic resources. The analysis of historic resources is based on the Historic Resources Technical Report for the Sunset Bronson Studios (SBS) prepared by Historic Resources Group (November 2012). This report is included as Appendix D of this Draft EIR, and is incorporated herein by reference.

2. Environmental Setting

a. Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historic resources is established at the Federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. The principal federal, State, and local laws governing and influencing the preservation of historic resources of national, state, regional, and local significance include the National Historic Preservation Act (NHPA) of 1966, as amended, which established the National Register of Historic Places; the California Environmental Quality Act (CEQA); the California Register of Historical Resources; and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.130).

(1) National Register of Historic Places

The National Historic Preservation Act established the National Register, which is “an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties
should be considered for protection from destruction or impairment.”

Properties listed in the National Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or be listed in the National Register, a resource must possess significance in American history and culture, architecture, archaeology, or engineering. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historical resource. The primary positive effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a review process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

(a) Criteria

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The criteria ensure that the quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association. In addition, a property of potential significance must meet one of four established criteria:

a. Associated with events that have made a significant contribution to the broad patterns of our history; or

b. Associated with the lives of persons significant in our past; or

c. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

d. Have yielded, or may be likely to yield, information important in prehistory or history.

(b) Integrity

In addition to meeting any or all of the criteria listed above, a property nominated for listing on the Historic Register must possess historic integrity. Historic integrity is defined as “the ability of a property to convey its significance” and as “the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.” The National Register recognizes seven aspects or qualities that comprise integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

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

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(c) Period of Significance

The National Park Service defines the period of significance as “the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for listing” in national, State or local registers. A period of significance can be “as brief as a single year... [or] span many years.” It is based on “specific events directly related to the significance of the property,” for example the date of construction, years of ownership, or length of operation as a particular entity.4

(d) Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic districts. 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.”5 A historic district derives its significance as a single unified entity.

Resources that have been found to contribute to the historic identity of a district are referred to as district contributors. Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

(2) California Register of Historical Resources (California Register)

The California Register is very similar to the National Register program. The California Register was enacted in 1992, and its regulations became official January 1, 1998. The California Register is administered by the State Office of Historic Preservation (OHP).

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 are to be protected, to the extent prudent and feasible, from substantial adverse change.”6 The criteria for eligibility for the California Register are:

Register are based upon National Register criteria and at least one criterion must be met. These criteria are:

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

- **Criterion 2:** Associated with the lives of persons important to local, California or national history.

- **Criterion 3:** Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.

- **Criterion 4:** Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

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

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.

- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).

- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.

Other resources which may be nominated for listing in the California Register include:

- Individual historical resources.

- Historical resources contributing to the significance of an historic district under criteria adopted by the Commission.
IV.D Historic Resources

- Historical resources identified as significant in historical resources surveys, if the survey meets the criteria listed in subdivision (g).

- Historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.

- Local landmarks or historic properties designated under any municipal or county ordinance.

(3) California Environmental Quality Act (CEQA)

For purposes of CEQA, Public Resources Code Section 21084.1 defines a historical resource as:

[A] resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource.

CEQA Guidelines Section 15064.5(a)(3) also provides additional guidance on this subject:

[A]ny object, building, structure, site, area, place, record, or manuscript 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 may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources.
Generally, CEQA utilizes the Secretary of the Interior’s Standards for Rehabilitation (Secretary’s Standards) as a means of evaluating when a project might be found to have less-than-significant impacts on historical resources.

(4) Local Historic Programs

(a) City of Los Angeles Cultural Heritage Ordinance

The Cultural Heritage Ordinance, originally adopted by the Los Angeles City Council in 1962 (sections 22.120 et. seq. of the Administrative Code), created the City’s Cultural Heritage Commission and established criteria for designating City of Los Angeles Historic-Cultural Monuments. The Los Angeles City Council designates Historic–Cultural Monuments on the recommendation of the City’s Cultural Heritage Commission. Section 22.171.7 of the City of Los Angeles Administrative Code defines an historical or cultural monument as:

“[A]ny site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.”

Designation recognizes the unique historical, cultural, or architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic–Cultural Monument status. Buildings may be eligible for historical cultural monument status if they meet the criteria in the Cultural Heritage Ordinance and retain their historic design characteristics and materials.

(b) Hollywood Community Plan

Adopted by the City Council in June of 2012, the Hollywood Community Plan Update includes a stated goal with regard to the protection and conservation of historic resources.7

The Hollywood Community Plan Update details policies to protect cultural resources, historic neighborhoods, and neighborhood character. These include the promotion of infill development that “matches the scale of historic resources” within historic districts (Policy LU.1.6); maintaining “height limitations on commercial zones which border recognized historic neighborhoods (Policy LU.1.7); and encouraging the design of new buildings that “respect and complement the character of adjacent historic neighborhoods” (Policy LU.1.7). Additional information regarding the Hollywood Community Plan Update is provided in Section IV.E, Land Use, of this Draft EIR.

(c) Historic Preservation Overlay Zone Program

The City of Los Angeles developed the Historic Preservation Overlay Zone program to recognize and protect neighborhoods with distinct architectural and cultural resources. Historic Preservation Overlay Zones allow for review of proposed exterior alterations and additions to historic properties within designated areas. An area can be designated as an Historic Preservation Overlay Zone if it contains structures, landscaping, natural features, or sites with historic, architectural, cultural, or aesthetic significance. Once designated, areas have a Historic Preservation Overlay Zone designation added to the underlying zoning and are subject to special regulations under Section 12.20.3 of the Los Angeles Municipal Code.

Historic Preservation Overlay Zones range in size from neighborhoods of approximately 50 parcels to more than 3,000 properties. While most Historic Preservation Overlay Zones are primarily residential, some include commercial and industrial properties. Historic Preservation Overlay Zones are established and administered by the Los Angeles City Planning Department (in concert with the City Council). Individual buildings in a Historic Preservation Overlay Zone need not be of landmark quality on their own; it is the collection of cohesive, unique, and intact resources that qualifies a neighborhood for Historic Preservation Overlay Zone status. Although there are a number of designated Historic Preservation Overlay Zones in Hollywood and Greater Wilshire, none are located adjacent to the Project Site.

b. Historic Context

The motion picture industry has played a critical role in the economic and cultural development of Los Angeles, and a large part of the City’s identity is tied to its role as a center of the entertainment industry. As the original location of Warner Brothers West Coast Studios, the SBS campus is one of the few remaining studio properties in Hollywood that dates from the early period of the motion picture industry in Southern California. The SBS campus contains buildings and structures specific to motion picture production that were constructed prior to 1930. Warner Brothers Studios has its origins in the early
development of motion pictures, making important contributions to the silent film era, and played a key role in the development of sound motion pictures, as it matured into one of the eight major American film studios.

The company name “Warner Brothers” refers to the four founding brothers: Harry, Albert, Sam, and Jack. In 1920, Sam and Jack, who had moved to Los Angeles, purchased 10 acres of land in Hollywood to construct a studio. This land was bounded by Sunset Boulevard to the north, Van Ness Avenue to the east, Fernwood Avenue to the south, and Bronson Avenue to the west, and it was named the Warner Brothers West Coast Studio. The company struggled for profitability in the first years of the 1920s, and did not earn consistent profits until 1923 with the production of “Where the North Begins” starring a dog named Rin Tin Tin. Increased profits followed and allowed Warner Brothers to hire more expensive talent and improve the production values of their films. As the Warner Brothers West Coast Studio prospered, it gained backing from Wall Street, and, in 1924, Goldman Sachs arranged a major loan. In 1925, Warner Brothers established a partnership with Western Electric for the purposes of developing sound motion pictures.

In 1925, the Warners also established a radio station, KFWB, on site at the studio property. In Warner Brothers’ view, the radio station would serve as a powerful means of promoting films. This radio station, as well as the other early radio stations in Los Angeles, used large steel towers to transmit their broadcast signal. At KFWB, two skeleton-frame steel radio towers were installed on either side of the Executive Office Building (EOB). During the 1920s, the letters KFWB were added to the upper portion of the towers to advertise the station. The letters were arranged vertically with the letter “K” near the top of the tower and the letter “B” at a point about one-third of the way down the tower. Other radio stations in Los Angeles followed the same practice of attaching call letters to their radio towers. Strings of small electrical light bulbs were attached to the four sides of each tower for illumination at night.

In 1926, the Vitaphone Corporation was established to research sound technology, with 70 percent of the stock held by Warner Brothers. In 1927, Warner Brothers took the next step and released The Jazz Singer starring Al Jolson which contained several singing sequences and a few minutes of dialogue. Warner Brothers’ successful gamble on sound films moved the studio into the top ranks of film studios in Hollywood. However, the onset of the Great Depression caused severe financial troubles for the film industry including Warner Brothers. The Warner Brothers and First National Studios were merged and Warner Brothers moved the majority of its production activity to the First National lot in Burbank. By 1929, the Warner Brothers West Coast Studio was referred to as the “Warners Hollywood Annex” and was used largely for sound engineering and technical development. Offices and recording studios for Vitaphone also remained on the property. Filming at the Warner Brothers West Coast Studio continued for special productions with
major stars such as James Cagney and John Barrymore, as well as short subjects. KFWB also continued to broadcast from the Warner Brothers West Coast Studio.

After consolidating their operations at the Burbank plant, feature-length film production largely ended at the Warner Brothers West Coast Studio by the early 1930s. By 1939, much of the Warner Brothers West Coast Studio was transformed into a recreation center by Harry Charnas, the husband of the Warner Brother's sister Rose; for example, Stage 1 (or Building 9) became a 52-lane bowling alley, and the ground floor of the EOB became a café and soda fountain. During World War II, the bowling alley was open 24 hours a day. Other stages were used as badminton courts and a roller skating rink. Ancillary studio uses such as short subject production, cartoon production, and sound engineering continued to operate alongside the recreational uses into the mid-1950s.

In 1954, the lot was purchased by Paramount Pictures as an annex for their main studio on Melrose Avenue, and was renamed the Paramount Sunset Studio. Paramount used the studio primarily as a television production facility. The facilities were rented out to independent producers for the production of various television shows. In 1957, Paramount moved its television station, KTLA, onto the lot.

In 1964, Golden West Broadcasting Corporation, which was owned by Gene Autry, purchased the KTLA television station and the studio lot from Paramount Pictures. During this period an addition was constructed on the east side of the EOB. This addition was the location of Gene Autry’s office and private dining room.

In 1982, Golden West Broadcasting sold KTLA television and the lot to Kohlberg, Kravis, Roberts and Company. In 1985, KTLA and the studio lot were bought by the Chicago Tribune Company. Since 2008, the property has been owned by Sunset Bronson Studios Entertainment Properties LLC (and its affiliated predecessors), a wholly owned subsidiary of Hudson Pacific Properties, Inc.

c. Existing Conditions

Land uses in the Project area include a mix of commercial, industrial, and residential land uses. Land uses to the north, across Sunset Boulevard, are commercial and residential in nature and include surface parking lots, a Mobil gas station, the three-story St. Moritz Hotel with lower level retail and a bar, the Metropolitan Residential Tower and three-story walk-up office structure, and a Midas auto repair and service center. Land uses to the east, across Van Ness Avenue, consist of the Los Angeles Unified School District (LAUSD) Helen Bernstein High School campus, with the US-101 Freeway located further to the east. Land uses to the south consist of the LAUSD Joseph Le Conte Middle School campus, followed by residential development. Land uses to the west, across Bronson
Avenue, include single- and multi-family residential developments, with commercial land uses located adjacent to the south side of Sunset Boulevard.

The Project Site is a part of the overall SBS campus. The 4.36-acre Project Site is currently developed with an asphalt-paved surface parking lot providing approximately 466 parking spaces, three studio-related ancillary buildings, two structural additions to the Executive Office Building (EOB), and several ancillary structures (e.g., satellite dishes and emergency generators), occupying a total of 14,499 square feet of building area. Studio facilities are located immediately adjacent to the south and west side of the Project Site.

The existing structures within the SBS campus are described below and are illustrated in Figure II-3 of Section II, Project Description of this Draft EIR. The SBS Campus contains twelve buildings and four structures including a radio antennae tower, guard structures, and a restroom pavilion. In this discussion, a building’s historic name, when different from its current name, is included in parenthesis.

(1) Stages 1, 2, and 3 (Stage 2)

Stages 1, 2, and 3 were constructed in 1924 as a single building. Many Warner Brothers films were shot here between 1924 and 1938. During the 1940s the building was used as a roller skating rink. In later years many television production companies used the studio lot, including the *Gunsmoke* television series, which recreated its Western town in these stages. The wood-framed building is approximately four stories in height and rectangular in shape. Covered by a flattened gambrel roof, the building is clad in stucco. A three-story shed roof wing extends for approximately 20 feet along the entire east façade, creating technical support and dressing room areas for the adjacent sound stages. Access to the stages from the exterior is provided through large sliding doors on the east façade of the wing. Although now enclosed, the top level of the wing was originally an open loggia that provided open space for the adjacent dressing rooms. The loggia openings have been replaced with tinted, fixed, single-pane windows. The north and west façades have no doors or windows. The south façade joins Stage 4. A new roof was added in 1991.

(2) Stages 4 and 5 (Stage 7)

Stages 4 and 5 were constructed in approximately 1928 as a single building. They are attached to the south end of Stage 3, separated by a concrete firewall. During the 1940s the building was used as badminton courts. In later years many production

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*Two portable office trailers are also located at the northeast corner of the site but are not described here.*
companies used the studio lot, including the *Gunsmoke* television series, which used the stages to store the rolling stock and as a stable for the horses. The wood-framed building is approximately four stories in height and rectangular in shape. Covered by a flattened gambrel roof, the building is clad in smooth stucco. Access to the stages from the exterior is provided through large sliding doors on the east façade. Windows on the west and south façades have been covered over. New dressing rooms were added to Stage 5 in 1991 within the existing building envelope.

(3) Stage 6 (Historic Stage 6)

Constructed in 1928, Stage 6 served as one of several sound stages on the studio lot. The steel-framed building is approximately three stories in height and rectangular in shape. Covered by a flattened gambrel roof, the exterior walls are clad in stucco. Two-story shed roof wings extend along the north and south façades. The south end houses dressing rooms and storage, while the north end contains the electrical vault and utility rooms. The main access from the exterior is centered on the north façade and consists of a six-panel sliding wood door. Several tinted, fixed, single-pane windows are present on the north façade.

(4) Stages 7 and 8 (Stages 4 & 5)

Constructed in 1928–1929, sound stages 7 and 8 were constructed as a single building by Warner Brothers to handle the increased production of sound films. In the 1940s they were used by KFWB radio. Later they were used as television studios. The wood-framed building is two stories in height, rectangular in shape, and sheathed in stucco. Stage 7 occupies a side-gabled wing to the west. To the rear of this wing is a two-story, flat-roofed addition with a one-story, shed-roof wing attached to the west. Tinted, fixed, single-pane windows and modern doors have been added. In 1978, office spaces were installed on the second floor within the existing building envelope.

(5) Stages 9A and 9B (Stage 1)

Constructed in 1922–1923, this stage building is attached to the rear of the Executive Office Building. Notably, it was the site of the filming of *The Jazz Singer*, the first feature-length film to incorporate synchronized singing and dialogue. From 1939 to 1948, the building was used as a bowling alley. The wood-framed building is approximately four stories in height, rectangular in shape, and clad in smooth stucco. A flattened gambrel roof covers the building. A three-story wing on the south façade houses restrooms, dressing rooms, and storage. One-over-one, double-hung, wood sash windows originally ran along the upper wall of the wing. The original windows have since been replaced with tinted,
fixed, single-pane windows. An elevator tower has been added to the approximate center of the south façade. Two large doors on the east façade provide access to the stages.

(6) Building 10 (Executive Office Building)

Constructed in 1922–1923, the Executive Office Building was originally used for the Warner Brothers offices, until the executive staff moved to Burbank in 1930. From 1939 to 1948, it was used as a café and soda fountain related to the bowling alley that occupied Stage 9 to the rear. Two stories in height, the Executive Office Building is a long rectangular wood-framed structure clad in stucco. The original building is symmetrical in form and designed in a Neo-Classical style. The north façade features a second story colonnade of Doric columns connected by a balustrade fronting a recessed balcony. The colonnade is topped with an entablature. A simple cornice rises above the roofline. The fenestration is symmetrical and consists of large, multi-pane windows. The east and west ends of the building were originally one story in height. In 1929, the west end was expanded to include a second story. A second story was added to the east end in 1931. Many of the design elements in the central section of the building were continued across these sections. A single-story addition was made to the west end in the 1940s. The majority of this addition is separated from the main building by a narrow courtyard. A two-story addition was made to the east façade of the building in 1968 to house an office and private dining room for Gene Autry.

(7) Building 11 (Production Offices and Property Storage)

Identified on the 1950 Sanborn map as the “Wardrobe Stage,” this building incorporates the original Stage 1, or “the Barn” and attached shops and offices which were constructed in 1920. Alterations and additions between 1927 and 1929 transformed the building into a three-story office and property storage facility. A portion of the building was occupied by Looney Tunes in the 1930s and ’40s. Substantially altered in 1989, the box-like building has a flat roof and stucco exterior. Multiple tinted, fixed, single-pane windows are now distributed evenly across all four façades.

(8) Building 14 (Relocated Portion of Original Mill Building)

This shop and mill building was originally part of a much larger building that was located northeast of its current site. That structure was originally an L-shaped building located on the east side of the lot near Van Ness Avenue. According to the 1991 Building Inventory, the original mill building was cut into parts between 1949 and 1952. One section was moved to the present location of Building 14 and the other section was moved to the present location of Building 21 (Technical Center Building). The current building occasionally functions as a shop to construct sets, but is mostly used for storage and as an
automobile washing and servicing area for certain existing studio tenants. The current mill building is approximately two stories in height, has a gabled roof, and a stucco exterior. The north and south façades feature multi-paned steel sash windows and tall sliding corrugated metal doors.

(9) Building 15 (Vitaphone Recording)

Constructed in 1928, Building 15 was originally used for recording by Vitaphone. The building is a one-story reinforced concrete building with multi-paned steel sash windows on the south façade and a flat roof. A sliding metal door provides access to the basement. The windows have been covered or painted over.

(10) Building 16 (Vitaphone Administration)

Constructed in 1929, this building was originally used as administrative offices for Vitaphone. After Warner Brothers moved to Burbank in 1930, the building was used as the offices of radio station KFWB and the studios and offices for Leon Schlesinger’s Looney Tunes and Merrie Melodies cartoon series. It is now used as offices for KTLA television. The building is rectangular in shape with a shallow-pitched gabled roof. Massing consists of a two-story central section flanked by single-story wings. The west end of the building shares a wall with Stage 6. The Van Ness Avenue façade features quoins and a small oval vent beneath the apex of the gable. These classical details originally embellished an entrance on Van Ness Avenue that has since been vacated. In 1991, the building was altered. Tinted, fixed, single-pane windows replaced the original multi-paned steel sash. In 2005, the building was again altered when a single-story addition with a shed roof was constructed on the north façade of the building’s eastern portion.

(11) Building 18 (Van Ness Gate Guardhouse)

Constructed in 1967, this one-story wood-framed building functions as the guardhouse for the Van Ness Avenue entrance to the studio lot. It mimics the design of Building 19. The building is rectangular in shape with a stucco exterior. The flat roof has wide overhanging eaves. Windows have been replaced with steel-framed fixed windows.

(12) Building 19 (Bronson Gate Guardhouse)

Constructed in 1956, this one-story wood-framed building functions as the guardhouse for the Bronson Avenue entrance to the studio lot. The building is rectangular in shape with a stucco exterior. The flat roof has wide overhanging eaves. Windows have been replaced with steel-framed fixed windows.
(13) Building 20 (Videotape Library)

Constructed in 1978, the Videotape Library is a one-story stucco clad building located between Buildings 21 and 15. There is a loading dock on the west façade.

(14) Building 21 (Control Building)

Constructed in 1981, Building 21 houses editing suites and engineering facilities as well as offices. The three-story steel-framed building is rectangular in shape with a flat roof. The roof has a decorative band along the parapet. The west façade is symmetrically organized around a central bay. At the first story is a recessed main entrance, at the second story is a balcony, and at the third story is a bank of windows. Fenestration is tinted, fixed, single-pane windows.

(15) Building 22 (Restrooms)

This 1974 restroom facility is one story in height, rectangular in shape, and sheathed in stucco. The flat roof has wide overhanging eaves. There are two slab doors on the north façade leading to the men’s and women’s rooms.

(16) KTLA Radio Tower (KFWB Radio Tower)

The KTLA Radio Tower is one of two matching towers that originally flanked the EOB. They were erected in 1925 to transmit radio station KFWB programs. In the 1950s, this tower was relocated to its present location at the corner of Sunset and Van Ness, and the second tower was removed. The tower is a four-legged, steel-skeleton structure. The base is approximately 30 feet square and rises approximately 160 feet in height. The letters KTLA and the number 5 have been attached and read vertically on all four sides. Two electronic message boards are attached near the base of the tower facing Van Ness Avenue and Sunset Boulevard.

d. Potential Historic Resources within the Project Site

Since the late 1970s, the SBS campus has been subject to previous historic designations and listings on historic registers, as well as historic evaluations, surveys and studies for planning purposes. These previous investigations, as summarized below, indicate a long-standing recognition of the historic importance of the site.
(1) Designations and Listings

In 1977, the entire studio property was designated as Los Angeles Historic-Cultural Monument #180 as the “Site of the Filming of the First Talking Feature Film.” The designation specifically recognized the filming of *The Jazz Singer* in 1927 as the basis for the designation, but did not differentiate individual buildings located on the site.

In 2002 the EOB (Building 10) was listed in the National Register of Historic Places. It was found significant under Criterion A for its “strong association with Warner Brothers Pictures, which has played a significant role in the history and development of the motion picture industry.” The National Register nomination form includes the EOB only noting that the boundary “was drawn to include the building and its immediate setting and to exclude non-historic buildings and surface parking lots.” The period of significance for the EOB was determined to be 1923–1938. By virtue of being listed in the National Register, the EOB is also listed in the California Register of Historical Resources.

The SBS campus is listed in the State Historic Resources Inventory as “Warner Brothers West Coast Studios” with a status code of 2S3 or “Individual property determined eligible for the National Register by Part 1 Tax Certification.” It also has a previous listing as 3S or “Appears eligible for the National Register as an individual property through survey evaluation.” Previous surveys conducted in 1978, 1986, 2003, and 2009 have identified the property as a 3S. The EOB is listed with a status code of 1S or “Individual property listed in the National Register by the Keeper. Listed in the California Register.”

(2) Other Evaluations

(a) 1990 Memorandum of Understanding

Individual buildings on the studio lot were documented as part of a legally non-binding Memorandum of Understanding (MOU) dated December 12, 1990 between The Thirteenth Council District Office, The Office of Motion Pictures/Television Affairs of the City of Los Angeles, Hollywood Heritage, The Los Angeles Conservancy, and participating

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11 Ibid.
The Coalition “agreed to adopt the National Register Criteria for Evaluation as a general framework.” Final assessments of individual buildings, however, were based upon a more informal classification system developed by the Preservation Coalition. Each building was ranked based on its presumed historic value. Refer to Appendix D for an explanation of the various categories and evaluation of the SBS campus buildings based on these categories. The categories in the MOU do not correspond to the methodology established for evaluating historic resources by the State Office of Historic Preservation, the National Park Service, and contemporary standards of preservation practice. As such, they have little meaning outside of the context of the MOU. The 1991 building inventory prepared in compliance with the MOU does represent the first documentation of individual buildings on the Project Site.

(b) SurveyLA Historic Context Outline

SurveyLA14 has developed a Historic Context Statement (HCS) that provides a framework for completing the city-wide historic resources survey. The SurveyLA HCS uses the “Multiple Property Documentation” approach developed by the National Park Service. This approach organizes the themes, trends, and patterns of history shared by properties into historic contexts; identifies and describes historic resources or property types that represent the contexts; and provides specific standards to guide the evaluation of significance.

Motion picture studio properties developed by one of the “Big Eight” Studios during the Studio Era have been identified in the SurveyLA HCS as a significant property type for their association with the entertainment industry in Los Angeles.

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12 Tribune California Properties, a previous owner of the Sunset Bronson Studio property, was signatory to the MOU.


14 The City of Los Angeles is engaged in a multi-year effort to complete a citywide historic resources survey. The project—named SurveyLA the Los Angeles Historic Resources Survey Project—is managed by the staff of the Office of Historic Resources (OHR) within the Department of City Planning (DCP). The 2009 CRA survey effort used the context developed by SurveyLA in its analysis.
(3) Identification of Potential Historic Resources

The Historic Resource Report analyzed the entire SBS campus, including, but not limited to, the buildings and structures that are within the Project Site and that could be directly impacted by the Proposed Project. Buildings and structures located on the SBS campus were evaluated for their collective potential historic significance in terms of a historic district, in addition to their historic value as individual resources.

(a) Assessment of Individual Resources

As discussed above, the Project Site contains individual historic resources. One building and one structure on the Project Site meet the criteria for individual historic resources. These resources are discussed further below including the following.

(i) Executive Office Building

The EOB (Building 10) is listed in the National and California Registers. The EOB continues to retain its integrity and retains eligibility for both registers. The single-story addition from the 1940s is not character-defining. In addition, the 1964 Gene Autry addition was constructed outside of the period of significance.

(ii) KTLA Radio Tower

The KTLA Radio Tower is eligible for listing in the National and California Registers for its association with early radio in Los Angeles. The KTLA Radio Tower was erected in 1925 for KFWB radio, which was owned by Warner Brothers. The KTLA Radio Tower was one of two towers that flanked the entrance to the EOB (Building 10). The tower was moved to its present location around 1957, while the second tower was removed from the studio lot.

(b) Potential Historic District Resources

The National Park Service, as discussed earlier in this section, 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. Since the SBS campus 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 an historic district is the appropriate analytical framework for its evaluation.

The SBS campus contains a distinctive configuration of buildings and structures that appears to be significant for its association with the development of the motion picture industry in the United States and the concentration of the industry’s production facilities in
Southern California. The SBS campus is important as the original Hollywood location of Warner Brothers, one of the leading film studios responsible for developing the motion picture as a commercial entertainment form that would have a substantial impact on popular culture in the United States and throughout the world.

The period of significance for the former Warner Brothers Studio property extends from 1920, when the Hollywood property was first developed as a film location, to 1954, when the Warner Brothers property was sold to Paramount Pictures. This timeframe includes Warner Brothers’ initial establishment of motion picture production facilities in Hollywood and its development as an important film studio during the silent and early sound eras. As discussed above, the property was also an important location for Warner Brothers’ landmark innovations in sound technology for motion pictures in the late 1920s. Following Warner Brothers’ relocation of administrative staff and the majority of its film production to its Burbank studio, Warners continued to use the property as an “annex” studio during its maturation as one of eight leading film studios.

The property was built out as a studio complex during the Warner Brothers period and changes to the property have largely consisted of demolition of buildings to provide for surface parking. With the exception of a handful of small buildings and structures, only Building 21, built in 1981, has been constructed on the site since 1930. Motion picture studio lots in Hollywood that date from that era are considered a finite and increasingly rare resource. While many of the earliest studio lots are no longer extant, others have continued to operate, although with considerably reduced physical plants. All have demolished at least some of their original buildings and have undergone considerable renovation.

Other studio properties in Hollywood include the former Columbia Studios property (now Sunset Gower Studios) located just east of Sunset Boulevard and Bronson Avenue at Sunset Boulevard and Gower Street; the former Vitagraph, and later Warner Brothers studio (now Prospect Studios) located at Prospect and Talmadge Avenues; the former Christie Films studio (Hollywood Center Studios) at Santa Monica Boulevard and North Las Palmas Avenue; Red Studios (originally constructed by Metro Pictures) at Cahuenga Boulevard and Willoughby Avenue; the former Chaplin Studios (now Henson Recording Studios) at La Brea Avenue and Sunset Boulevard; and the former United Artists Studios (The Lot) at Santa Monica Boulevard and Formosa Avenue in West Hollywood. Similar to the SBS campus, these studios may present characteristics of historic districts, but none have been formally designated as a historic district.
(i) Contributing Elements to a Potential Historic District

As listed in Table IV.D-1 on page IV.D-21, a total of 17 buildings and structures on the SBS campus were evaluated. Table IV.D-1 includes an assessment of historic integrity for each building or structure. Those that have retained substantial historic material are given an assessment of good. Buildings or structures that have undergone alteration but still retain enough historic material to convey their historic identity are given an assessment of fair. Buildings or structures that no longer convey their historic identity due to substantial alteration are given an assessment of poor.

Ten buildings and one structure have been identified as remaining from the period of significance. All have experienced some level of alteration and/or relocation since their original construction. However, a greater degree of alteration is acceptable for this property type given the finite number of examples that remain extant. As shown in Table IV.D-1, of the 11 buildings and structures, nine have been assessed as either good or fair and maintain sufficient material integrity to convey their historic identity and thus are considered contributing resources to a potential historic district on the SBS campus. A map of the historic resources within the SBS campus is provided in Figure IV.D-1 on page IV.D-22.

(ii) Evaluation of the Potential Historic District on the SBS Campus

The SBS campus, as a potential historic district, appears to be significant under National Register Criterion A and 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 dates from Warner Brothers' development as a motion picture studio during the silent and early sound eras, and was an important location for Warner Brothers' landmark innovations in sound technology for motion pictures in the late 1920s. The property has retained integrity of location, design, setting, feeling, and association. While integrity of materials and workmanship have been somewhat compromised by alterations, the property has retained sufficient integrity to convey its significance. Thus, the property appears to meet the criteria for listing on the National Register of Historical Places and the California Register of Historical Resources. Also, as noted above, the SBS was designated as HCM #180 in 1977. The SBS campus has retained integrity of location, design, setting, feeling, and association and continues to meet the criteria for listing locally as a HCM.
### Table IV.D-1

**Historic Status of Buildings and Structures, Sunset Bronson Studios Campus**

<table>
<thead>
<tr>
<th>Date</th>
<th>Historic Name</th>
<th>Current Name</th>
<th>Integrity</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1922–23</td>
<td>Stage 1</td>
<td>Stage 9</td>
<td>Good</td>
<td>Contributor</td>
</tr>
<tr>
<td>1922–23</td>
<td>EOB*</td>
<td>Building 10</td>
<td>Good</td>
<td>Contributor/Individual Resource</td>
</tr>
<tr>
<td>1924</td>
<td>Stage 2</td>
<td>Stages 1,2 and 3</td>
<td>Good</td>
<td>Contributor</td>
</tr>
<tr>
<td>1924</td>
<td>KTLA Radio Tower 1*</td>
<td>KFWB Tower</td>
<td>Good</td>
<td>Contributor/Individual Resource</td>
</tr>
<tr>
<td>1928</td>
<td>Stage 6</td>
<td>Stage 6</td>
<td>Good</td>
<td>Contributor</td>
</tr>
<tr>
<td>1928</td>
<td>Stage 7</td>
<td>Stages 4 and 5</td>
<td>Good</td>
<td>Contributor</td>
</tr>
<tr>
<td>1928</td>
<td>Vitaphone Recording</td>
<td>Building 15</td>
<td>Fair</td>
<td>Contributor</td>
</tr>
<tr>
<td>1928–29</td>
<td>Stages 4 and 5</td>
<td>Stages 7 and 8</td>
<td>Fair</td>
<td>Contributor</td>
</tr>
<tr>
<td>(1920?) 1929</td>
<td>Property Storage (“The Barn”)</td>
<td>Building 11</td>
<td>Poor</td>
<td>Non-Contributor</td>
</tr>
<tr>
<td>1929</td>
<td>Vitaphone Administrative Offices</td>
<td>Building 16</td>
<td>Poor</td>
<td>Non-Contributor</td>
</tr>
<tr>
<td>1956</td>
<td>Mill*</td>
<td>Building 14 (Scenic Shop)</td>
<td>Fair</td>
<td>Contributor</td>
</tr>
<tr>
<td>1956</td>
<td>Bronson Gate</td>
<td>Guard House</td>
<td>N/A</td>
<td>Non-Contributor</td>
</tr>
<tr>
<td>1967</td>
<td>Van Ness Gate*</td>
<td>Guard House</td>
<td>N/A</td>
<td>Non-Contributor</td>
</tr>
<tr>
<td>1974</td>
<td>Restrooms*</td>
<td>Restrooms</td>
<td>N/A</td>
<td>Non-Contributor</td>
</tr>
<tr>
<td>1974</td>
<td>Audience Shelter</td>
<td>Audience Shelter</td>
<td>N/A</td>
<td>Non-Contributor</td>
</tr>
<tr>
<td>1978</td>
<td>Video Tape Library</td>
<td>Building 20</td>
<td>N/A</td>
<td>Non-Contributor</td>
</tr>
<tr>
<td>1981</td>
<td>Technical Center</td>
<td>Building 21</td>
<td>N/A</td>
<td>Non-Contributor</td>
</tr>
</tbody>
</table>

* Denotes building or structure located within the Project Site.

* Portions of the EOB located within the Project Site include the Gene Autry Wing and the north side addition.

Source: Sunset Bronson Studios Historic Resources Technical Report (Appendix D of this Draft EIR), Historic Resources Group, November 2012.

### 3. Project Impacts

#### a. Methodology

In order to identify and evaluate potential historic resources located within the Project Site, the following tasks were performed as part of the Historic Resources Technical Report:
Figure IV.D-1
Map of Historic Resources

1. A review of the existing properties located within the SBS campus.

2. A review of previous evaluations of the site through historic survey, evaluation, or other official actions.

3. Analysis and evaluation of any potential historic resources.

4. Review of the historic resources pursuant to the considerations set forth in CEQA.

In addition, primary and secondary sources related to the history of the motion picture industry in Los Angeles and the SBS campus' development as a motion picture studio were reviewed. Specifically, the following documents were consulted:

- California State Department of Parks and Recreation Historic Resources Inventory Forms;
- California State Office of Historic Preservation 2011 Historic Resources Inventory;
- Los Angeles County building permits;
- Sanborn Fire Insurance maps;
- Sunset Bronson Studios Hollywood, California Historic Resource Report, 2010;
- Survey LA Draft Historic Context—Entertainment Industry 2010; and
- Historic photographs, aerial photos, and site plans.

### b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a sample question that addresses impacts with regard to historic resources. This question is as follows:

Would the project:

- Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?
In the context of the above question from the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide states that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. Accordingly, the Proposed Project would have a significant impact on historical resources if a substantial adverse change in historic significance occurs due to any of the following:

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

The above significance thresholds established by the City of Los Angeles include, and go beyond, all of the provisions set forth in the CEQA Guidelines and, as such, the significance thresholds set forth in the City of Los Angeles CEQA Thresholds Guide are used in this analysis.

c. Project Design Features

**Project Design Feature D-1:** The portions of the EOB disturbed by construction activities shall be rehabilitated and preserved in accordance with the Secretary of the Interior's Standards for Rehabilitation. The Proposed Project design team shall consult with a preservation architect or other qualified professional throughout the rehabilitation.

**Project Design Feature D-2:** The KTLA Tower shall be relocated to its original location and preserved in accordance with the Secretary of the Interior’s Standards for Rehabilitation. The Project design team shall consult with a preservation architect or other qualified professional throughout the rehabilitation.

**Project Design Feature D-3:** To preserve sightlines to the EOB from Sunset Boulevard, the proposed 13-story office building shall include a setback from Sunset Boulevard at a distance equal to the setback of the EOB.
d. Project Impacts

The analysis presented below evaluates the potential for a significant impact to a historical resource in terms of the following: (1) demolishing a significant resource; (2) relocating or constructing a building or structure that would not maintain the integrity of a significant resource; (3) converting, rehabilitating, or altering a significant resource which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; and (4) impacting individual on-site historic resources or the potential on-site historic district.

(1) Demolition

As noted above, the Proposed Project would demolish the Van Ness Avenue guard station and a 77-square-foot restroom, neither of which are historic resources. In addition, the Proposed Project would demolish Building 14, which is a portion of the original Mill Building that was constructed sometime in the 1920s. In 1956, the original Mill Building was divided and the two portions were relocated to other areas of the lot. Building 14 survives today as a remnant of the original Mill Building. Building 14 is not considered to be individually significant, and demolition of Building 14 would not result in the demolition of an individually significant historic resource.

Building 14 is considered to be a contributor to the potential historic district on the SBS campus, and demolition of Building 14 would reduce the total number of contributing resources on the property. However, despite this loss, and based on Proposed Project development plans, the SBS campus would retain all of the other contributing resources from the period of significance, all in their original locations. Since Building 14 represents only a small portion of the original Mill Building that was relocated after the period of significance, it is not critical to retaining the significance of the potential historic district. The SBS campus would still contain a concentration of buildings and structures dating from the period of significance after the demolition of Building 14, as well as the remaining spatial relationships and circulation patterns. The SBS campus would continue to be eligible for National, State and local listing after demolition of Building 14. In addition, the Proposed Project does not include the demolition of any other contributing or individually significant buildings or structures. Therefore, the Proposed Project does not involve the demolition of a significant historic resource, and as a result, impacts associated with demolition would be less than significant.

(2) Relocation

The Proposed Project does not include the relocation of any individually significant buildings or buildings that contribute to the potential historic district on the property. The
Proposed Project does anticipate the relocation of the KTLA Tower, currently located on the northeast corner of the lot. The KTLA Tower has been identified as a historic structure, individually significant for its association with early radio in Los Angeles. The KTLA Tower is also considered a contributing structure to the potential historic district on the property.

The KTLA Tower was originally constructed in 1925 as one of two radio towers positioned in front of the Sunset Boulevard façade of the EOB. It was relocated to its current location in 1956. The Proposed Project proposes to return the KTLA Tower to its original location in front of the EOB. Therefore, the Proposed Project has the potential to enhance the integrity of the KTLA Tower and the historic district character of the property by returning the tower to its original location. Similarly, the Proposed Project would maintain the integrity of all other individually significant historic resources on the property, and maintain the integrity of the property itself, because no other buildings or structures would be relocated as part of the Proposed Project. As a result, potential impacts associated with relocation of a historic resource would be less than significant.

(3) Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings

The Proposed Project would remove the 1963 Gene Autry Wing and the 1940s northern addition to the historic EOB. As noted above, rehabilitation of those portions of the EOB disturbed by construction activities would conform to the Secretary of the Interior Standards. As a result the EOB would retain its original design and architectural integrity.

The Proposed Project would also relocate the KTLA Tower from its current location at the northeast corner of the Project Site to its original position in front of the western side of the EOB building. Therefore, the Proposed Project would restore the KTLA Tower to its original location. The functionality of the rehabilitated structures would remain in their current capacity, with the EOB continuing to be used for office space and the KTLA Tower continuing to serve as an ornamental visual historic element of the Project Site. Therefore, no portion of the Proposed Project has the potential to involve conversion, rehabilitation, or alteration of a significant historic resource which does not meet the Secretary of the Interior’s Standards, and as a result, impacts would be less than significant.

(4) Integrity or Significance of Important Resources On-Site or in the Vicinity

The Proposed Project would construct a thirteen-story office building at the corner of Sunset Boulevard and Van Ness Avenue, a five-story production office building at the center of the lot, and a seven-story parking structure on Van Ness Avenue. As a result, the Proposed Project would alter the immediate surroundings of historic resources on the
Project Site by constructing new low-rise and high-rise structures. As the Proposed Project would potentially add height and density in areas primarily used for surface parking, the immediate surroundings of the on-site historic resources would be altered. In order for this alteration to be considered a substantial adverse change, it must be shown that the integrity and/or significance of the historic resources would be materially impaired by the proposed alteration. As discussed below, the Proposed Project would not materially impair the significance of any of the historic resources located on the property. As a result, a less-than-significant impact would occur.

(5) Potential Impacts to the Historic District Characteristics on the Property

Motion picture studios from the studio era were largely designed as walled industrial compounds with only minimal orientation to the outside. Focused inward, the studio wall contained a collection of utilitarian buildings constructed largely for function and internal use. With the exception of outward-facing administration buildings and ceremonial gates, presentation to the world outside the studio was not considered advantageous.

Development of the Proposed Project would be confined to the eastern portion of the lot, currently occupied by surface parking and small buildings and structures. New construction would have the greatest visual impact along Van Ness Avenue and Sunset Boulevard. The Fernwood and Bronson Avenue façades of the SBS campus would remain unchanged.

The construction of a 13-story office building and seven-story parking structure would substantially change the Van Ness Avenue face of the SBS campus. This area of the SBS campus, however, has been substantially altered since the period of significance because several original buildings have been demolished and replaced with surface parking area. Therefore, the Van Ness Avenue face of the SBS campus does not significantly contribute to the property’s historic significance. The proposed new development, although adding considerable height and density, would not substantially impact the integrity of the SBS campus. The Proposed Project would complete the perimeter enclosure of the property along Van Ness Avenue. Enclosure along the perimeter (either by walls or building façades) is a character-defining feature of motion picture studios from the studio era. After implementation of the Proposed Project, the SBS campus would still contain a concentration of buildings and structures dating from the period of significance as well as the remaining spatial relationships and circulation patterns. Therefore, the Proposed Project would not materially impair the historic district resources on the SBS campus and a less-than-significant impact would result.
(6) Potential Impacts on the Executive Office Building

The SBS campus’ most important and character-defining façade is the EOB facing Sunset Boulevard, which was specifically constructed by Warner Brothers to create a memorable public face for the studio. As described above, a 13-story office building is proposed for the northeast corner of the SBS campus. However, as set forth in the project design features above, the Proposed Project would include setting the proposed office building back from Sunset Boulevard at a distance equal to the setback of the EOB. This setback would ensure that sightlines to the EOB from Sunset Boulevard are preserved. In addition, the design of the new office building recognizes the significance of the EOB and is setback from Sunset Boulevard to preserve sightlines. As a result, the new office building would not materially affect the EOB’s ability to convey its historic significance and impacts would be less than significant.

Construction of the Proposed Project has the potential to damage on-site historic resources due to underground excavation (i.e., settlement due to the removal of adjacent soil) and general construction procedures. From a geotechnical perspective, the Project Site is considered suitable for development and unstable soil conditions during construction of the Proposed Project are not expected to result in damage to historic resources. Thus, construction related impacts to historic structures are anticipated to be less than significant. Nonetheless, to provide the protection of adjacent historic resources, a mitigation measure that requires a shoring plan has been identified to ensure any construction-related significant impacts on historic resources are less than significant.

4. Cumulative Impacts

The analysis of cumulative impacts on historic resources involves an evaluation of whether the cumulative impacts of the Proposed Project and related projects in the area, when taken as a whole, would substantially diminish the number of existing resources within the same context, or of similar property types. Specifically, cumulative impacts would involve projects affecting local resources with the same level or type of designation or evaluation, projects affecting other structures located within the same National Register District, or projects that involve resources that are significant within the same context as resources associated with the Proposed Project.

As described above, the Proposed Project could potentially impact the KTLA Tower upon relocation to its original location. The Proposed Project could also potentially impact the EOB from the removal of the two additions. However, alterations to the EOB and KTLA Tower would comply with the Secretary of the Interiors’ Standards for the Treatment of Historic Properties, which would reduce any potential impacts to a less-than-significant level. Moreover, the alterations to the KTLA Tower and the EOB can be considered
beneficial impacts as the alterations are returning the structures to original locations and architectural form, respectively. In addition, a mitigation measure requiring a shoring plan would protect historic structures on the Project Site from potential damage that could occur during construction. Furthermore, the Proposed Project would not adversely affect any historic resources that are located beyond the boundary of the Project Site or the SBS campus generally. Thus, the Proposed Project would not have significant impacts on historic resources. As such, when assessed in the context of other related projects, the Proposed Project would not considerably contribute to any potential cumulative impacts to historic resources. Therefore, the Proposed Project would result in a less-than-significant cumulative impact to historic resources.

5. Mitigation Measure

To preclude any significant impacts during construction, the following mitigation measure would be implemented:

Mitigation Measure D-1: A shoring plan shall be implemented to ensure the protection of adjacent historic resources during construction from damage due to underground excavation, general construction procedures and to mitigate the possibility of settlement due to the removal of adjacent soil.

6. Level of Significance After Mitigation

The project design features and mitigation measure set forth above would reduce the potential impacts associated with historic resources to a less-than-significant level.