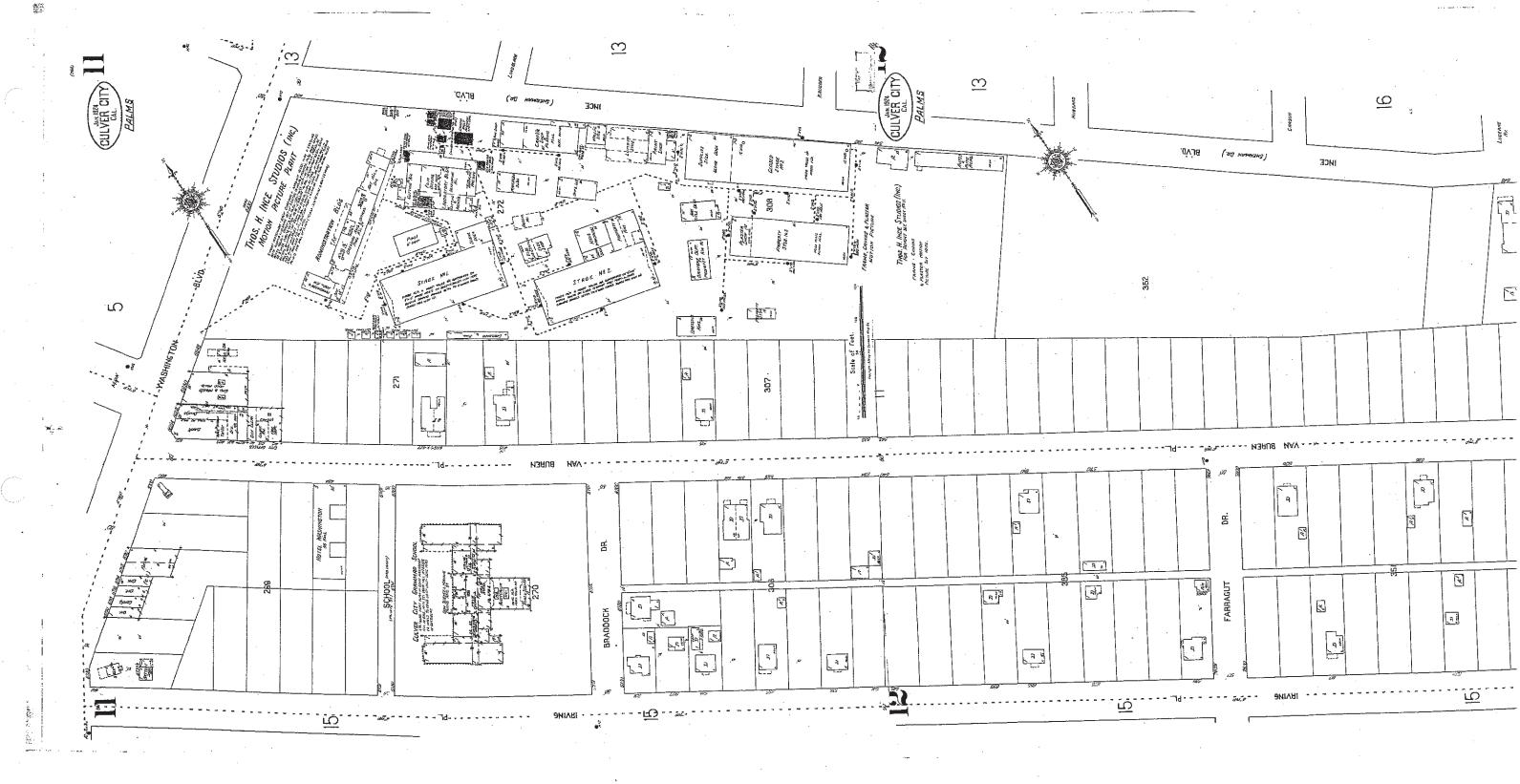
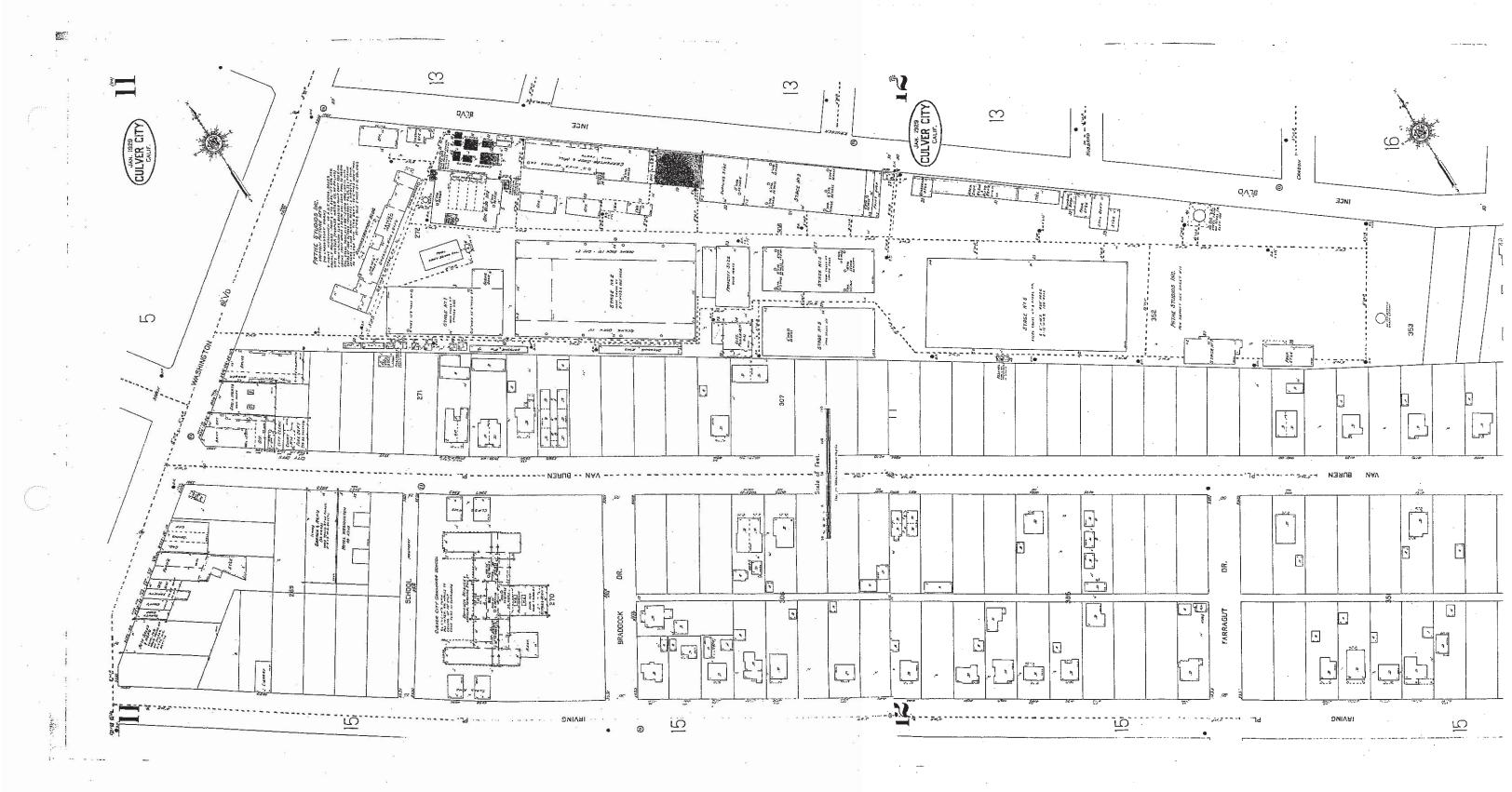
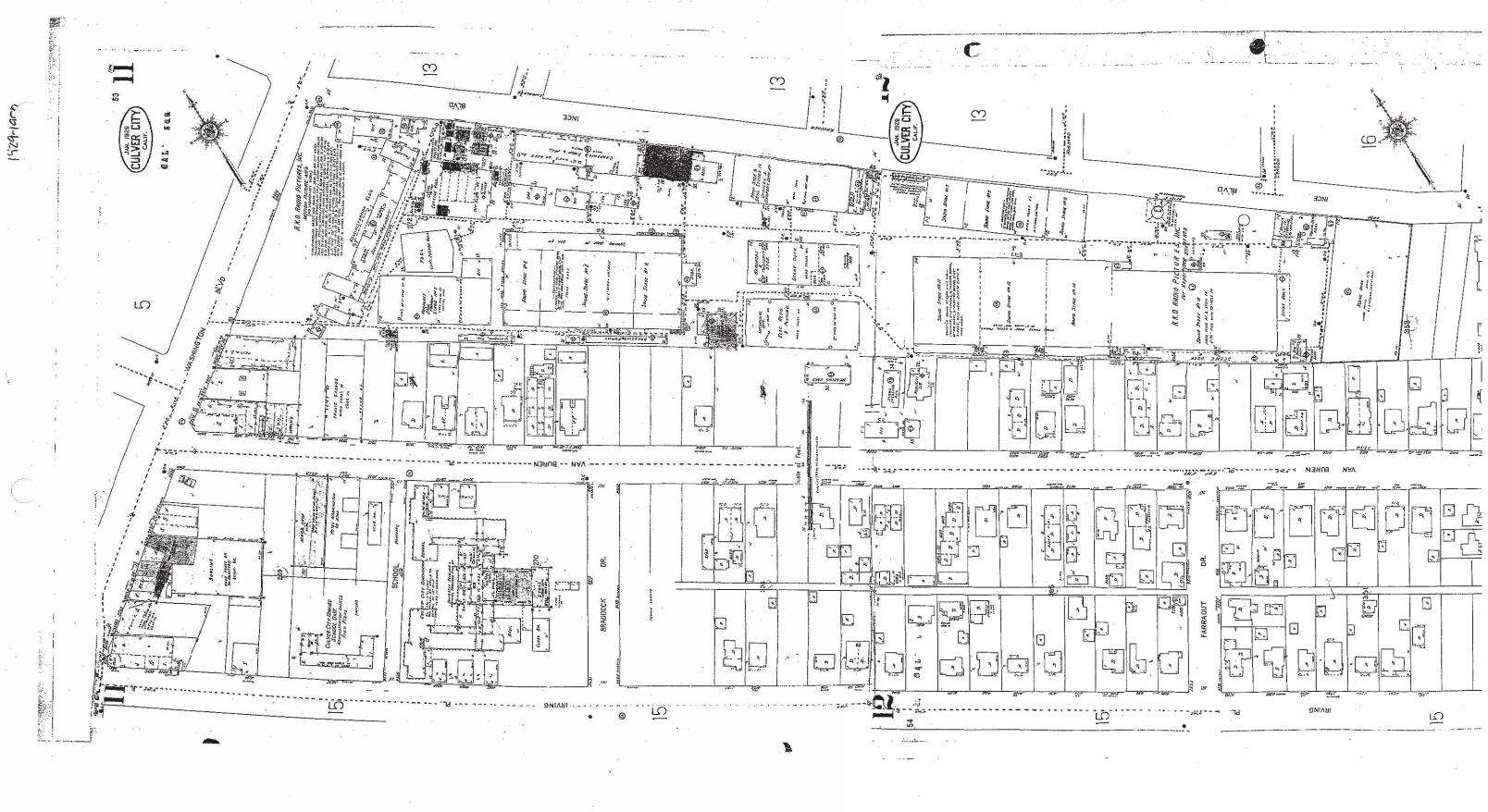
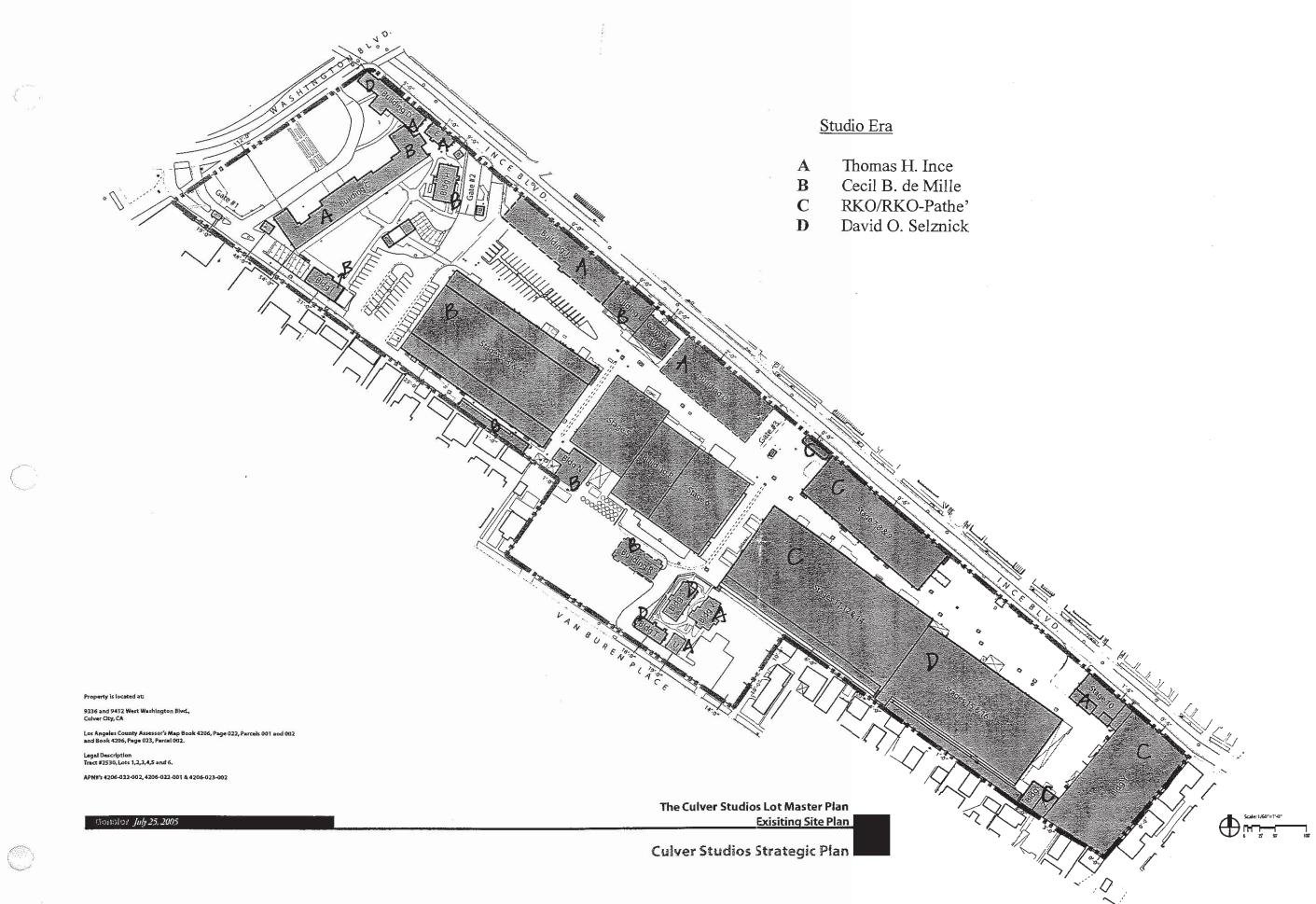


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THE CULVER STUDIOS: Comprehensive Plan Amendment #6

HISTORIC RESOURCES TECHNICAL REPORT

Historic Resources Assessment and Analysis of Project Impacts

Prepared for:

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October 2010

This document should be cited as:

ICF Jones & Stokes. 2010. The Culver Studios: Historic Resources Technical Report. October (ICF J&S P00536.09.). Los Angeles, CA. Prepared for: The Culver Studios. Culver City, CA.

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A. STATEMENT OF PURPOSE

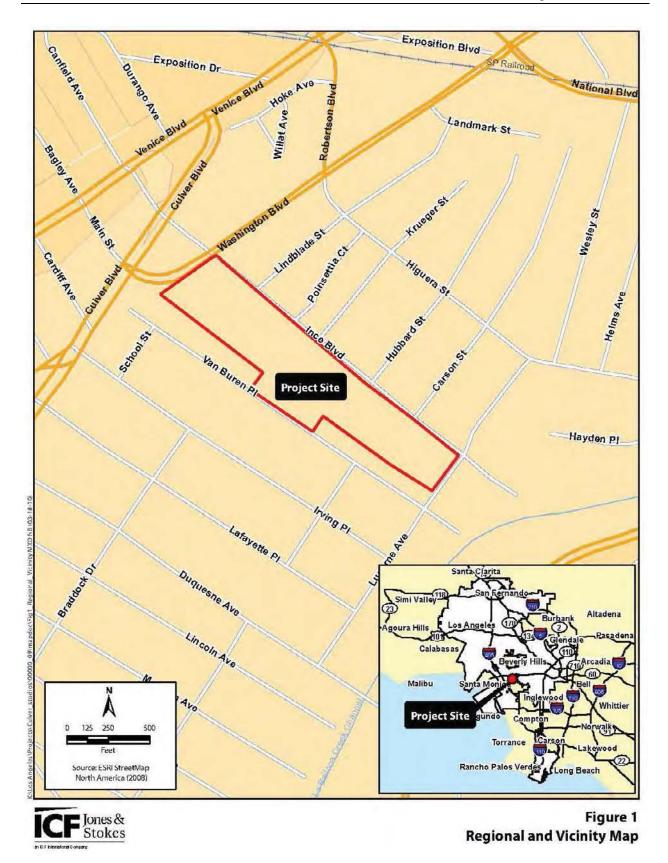
The purpose of this technical report is to identify and evaluate any historic resources that may be affected by the implementation of The Culver Studios: Comprehensive Plan Amendment #6 project (the Project); to assess any potential impacts of the project on those significant historic resources identified; and to recommend mitigation measures, as appropriate. This report is prepared to facilitate environmental compliance of the project under the provisions of the California Environmental Quality Act (CEQA). This technical report includes a description of the environmental setting, a brief contextual history of the study area, information regarding individual historic resources located within the study area, and an analysis of potential impacts the proposed project may have on the identified historic resources.

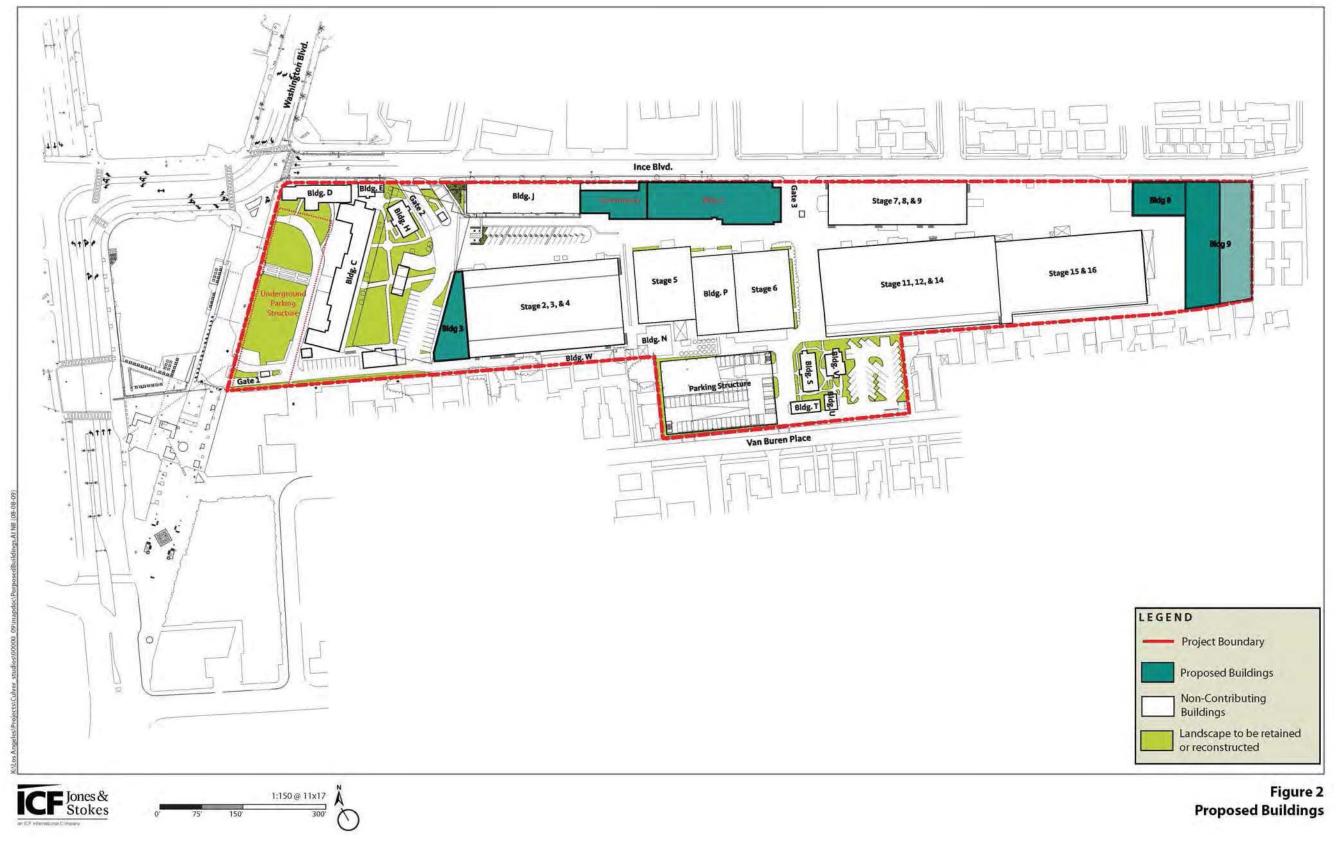
The Project location is located within the City of Culver City and has an address of 9336 West Washington Boulevard. Situated in the downtown area of Culver City, the site is just south of Culver Boulevard and two blocks south of Venice Boulevard (see Figure 1 on page 1-2). The proposed project is planned within a portion of The Culver Studios that has been previously identified as a potential National Register of Historic Places eligible historic district.

B. PROJECT DESCRIPTION

The Culver Studios project consists of two phases according to the Comprehensive Plan Amendment #6 planning document dated April 16, 2010, revised October 2010 (see Figure 2 on page 1-3). Four geographic areas within The Culver Studios District may be affected by the overall project: 1) along the property line wall on Ince Boulevard; 2) at the southern end of the lot adjacent to residential development along Lucerne Avenue; 3) in front of Building C (the Mansion); and 4) at Stages 2, 3, 4.

One of the primary objectives of the Phase I component of the Comprehensive Plan is to increase office and support space, as well as allow for additional parking facilities on site. Phase I would include the removal of four existing buildings (L, Commissary, O, and X) within The Culver Studios District for the construction of a new support building and commissary, as well as the temporary removal of the landscaped area in front of the historic Mansion (Building C) for the construction of an underground parking structure and driveway egress to Culver and Washington boulevards.





The planning of Phase II is conceptual at this time as no definitive design plans have been developed and, therefore, cannot be thoroughly analyzed for CEQA purposes. Nonetheless, it is anticipated that Stage 10 and Buildings Y and Z would be removed under this Phase for the construction of additional office and support facilities. Stages 2, 3, and 4 would be renovated and a moderate size, multi-story wedge shape addition of similar height would be erected along its north elevation. The exact design, materials, features, and style of this new structure have not yet been fully considered. Therefore, mitigation measures have been provided to reduce any potential adverse impact, including cumulative impacts, to the identified historic resources.

C. METHODOLOGY

A multi-step methodology to identify and evaluate historic resources within the project site was utilized. A records search to identify previously documented historic resources was conducted by both Historic Resources Group (HRG) and ICF Jones & Stokes. This search included a review of the National Register of Historic Places and its annual updates, determinations of eligibility for National Register listings, and California Historical Resources Inventory database maintained by the State Office of Historic Preservation (OHP).

Site inspections were made to document existing conditions; re-confirm previously identified resources, contributing and non-contributing properties, and character-defining features of those properties evaluated as significant; and define the historic resources study area. A survey of the study area, including photography and background research was then made. More specifically, in conducting the identification of historic resources and potential project impacts located within the study area, the following tasks were performed:

- Searched archival records of the National Register of Historic Places, California Historical Resources Inventory and the City of Culver City.
- Conducted field inspections of the survey study area.
- Photographed any recognized landmarks and potential historic resources located within the study area.
- Collected and reviewed historic images and historical information of the study area including, but not limited to those references on-line at the Regional History Center at the University of Southern California, the Los Angeles Public Library, City of Culver City, and The Culver Studios.
- Reviewed and analyzed previous documentation, ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation, designation assessment processes, and related programs.
- Reviewed previously completed survey work and documentation of the project site developed by Thirtieth Street Architects (TSA) in 1987 and HRG in 2006.

For this current work effort ICF Jones & Stokes historic preservation staff Rick Starzak, Principal/Senior Architectural Historian, and Barbara Lamprecht, Senior Architectural Historian, conducted the initial field investigation. Cultural Resources Team Leader Janet Ostashay and Barbara Lamprecht conducted subsequent field investigations and prepared the CEQA compliant historic resources technical report.

The analysis and report by ICF Jones & Stokes is based on the Existing Conditions Report and Preliminary Environmental Analysis (2006) prepared by Historic Resources Group for the City of Culver City. This survey assessment documents the history and existing conditions of the site (see Appendix).

The analysis of impacts on The Culver Studios District is based on the Comprehensive Plan, Amendment #6 (April 16, 2010, amended October 2010) prepared by Gensler, an architectural firm based in Santa Monica, California for The Culver Studios.

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities.

Numerous laws and regulations require federal, state, and local agencies to consider the effects of a proposed project on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies (e.g., State Historic Preservation Office and the Advisory Council on Historic Preservation). The National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); the California Register of Historical Resources; Public Resources Code (PRC) 5024; and the City of Culver City Historic Preservation Ordinance (Chapter 15.05 of the City's Municipal Code) are the primary federal, state, and local laws governing and affecting preservation of historic resources of national, state, regional, and local significance. A description of these laws and regulations is provided below.

A. FEDERAL LEVEL

1. National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (National Register) was established by the National Historic Preservation Act of 1966, as "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."¹ The National Register recognizes properties that are significant at the national, state and local levels. Further discussion of National Register criteria and guidelines is provided in Section III, Environmental Setting, of this document.

¹ Code of Federal Regulations (CFR), 36 Section 60.2.

B. STATE LEVEL

The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also carries out the duties as set forth in the Public Resources Code (PRC) and maintains the California Historic Resources Inventory. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the state's jurisdictions. Also implemented at the state level, CEQA requires projects to identify any substantial adverse impacts that may affect the significance of identified historical resources. Further discussion of OHP survey methodology and specific criteria to determine the significance of a resource are provided in Section III, Environmental Setting, of this document.

1. California Register of Historical Resources

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."² The criteria for eligibility for the California Register are based upon National Register criteria.³ Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register of Historic Places.⁴

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

- California properties listed in the National Register of Historic Places and those formally determined eligible for the National Register of Historic Places;
- California Registered Historical Landmarks from No. 770 onward;
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.⁵

² California Public Resources Code Section 5024.1(a).

³ California Public Resources Code § 5024.1(b).

⁴ California Public Resources Code § 5024.1(d).

⁵ *California Public Resources Code Section 5024.1(d).*

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

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.⁶

2. California Environmental Quality Act

Under CEQA, a "project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."⁷ This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historical resource. If so, then the second part involves determining whether the project may involve a "substantial adverse change in the significance" of the historical resource. To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted in final form on October 26, 1998 with the addition of State CEQA Guideline Section 15064.5. The new State CEQA Guidelines provide that for the purposes of CEQA compliance, the term "historical resources" shall include the following:⁸

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements in section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any 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 a 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, including the following:

⁶ California Public Resources Code Section 5024.1(e).

⁷ California Public Resources Code Section 21084.1 – Added in 1992 by AB 2881.

⁸ State CEQA Guidelines, 14 CCR Section 15064.5(a).

- a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- b. Is associated with the lives of persons important in our past;
- c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- d. Has yielded, or may be likely to yield, information important in prehistory or history.
- 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 (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

C. LOCAL LEVEL

1. City of Culver City

The City's historic preservation program was established in 1991 by ordinance.⁹ The ordinance included language regarding the designation and preservation of properties or "Cultural Resources" within the City. The Historic Preservation Ordinance (Chapter 15.05 of the City's Municipal Code) is administered through the City's Community Development Department and is implemented by the Cultural Affairs Commission. The Ordinance outlines a designation process, criteria, and procedures for altering or modifying designated Cultural Resources. Pursuant to the City's Ordinance, a Cultural Resource is a property that has aesthetic, cultural, architectural or historical significance to the City, State, or nation, and may have been designated as a Landmark Structure, Significant Structure, or Recognized Structure. The Ordinance also identifies historic districts as a Landmark District, a Significant District, or a Recognized District with similar criteria for designation.

⁹ City of Culver City website, http://www.culvercity.org/cultural/preservation.asp?sec=arts.

A. HISTORIC CONTEXT

1. City of Culver City

Located in the western part of Los Angeles County, the City of Culver City was founded by Nebraska-born real estate entrepreneur Harry Culver and incorporated in 1917. Early inhabitants included the Gabrielino-Tongva Native Americans. Initially part of Rancho La Ballona and Rancho Rincon de los Bueyes, the City has grown and developed over the years into a multifaceted community. Historically located off main transportation lines, the City grew from 1.2 square miles to over five square miles. Besides a distinct Main Street commercial center, the City includes an array of residential property types. The built environment of the City physically manifests its evolutionary history, including downtown's revitalization in the 1990s and 2000s.¹⁰

Since the early twentieth century, Culver City has been associated with the motion picture industry. Many film studios have been established and built within the City, including silent film comedy producer Hal Roach Studios, Ince Studio, and Metro Goldwyn Mayer Studios. Hundreds of movies and television shows have been produced on the lots of Culver City's studios.

2. The Culver Studios

The Culver Studios was originally built by silent movie pioneer Thomas Ince in 1918. After Ince's untimely death, the studio was purchased by Cecil B. DeMille, who erected large, massive sound stages and monumental sets on the backlot. From February 1925 through 1927, DeMille ran The Culver Studios site overseeing the first large-scale site renovations, including construction of the DeMille Theatre. RKO, a conglomerate of several companies, acquired the studio in 1928. By the end of 1930 two of the subsidiaries merged to form RKO-Pathé Studios. Another round of site renovations were made throughout the RKO-Pathé studio era. Selznick International Studios leased the entire site from 1935 to 1946, although it was still held by RKO-Pathé. More renovations were initiated during Selznick's leadership at the studio. It was during this time at the studio that actors Bette Davis, Robert Mitchum, Cary Grant, Katherine Hepburn, Fred Astaire and Ginger Rogers established themselves as "movie stars." When Selznick International suspended operations, RKO-Pathé once again ran the studio site, leasing space to Selznick's new Vanguard pictures company, amongst other independent production companies. In 1950, the multi-millionaire tycoon and movie producer Howard Hughes acquired the studio and leased out the space for productions. Following Hughes' ownership, Desilu Productions

¹⁰ http://www.culvercity.org/Visitors/CulverCityHistory/NativeAmericans.aspx

purchased the site in the mid 1950s. Over the next decade television emerged as the primary business conducted at the studio. The studio changed hands again in the late 1960s and the new owners sold off much of the studio's back lot at that time. By the late 1970s the studio had fallen on hard times and new owners renovated many of the sound stages and upgraded the overall property. In 1991, the studio was acquired by Columbia Pictures Entertainment, followed by the most recent ownership change of The Culver Studios in April 2004.¹¹

The multiple changes in ownership invoked numerous modifications in the site configuration involving relocation of existing structures, new construction and demolition of offices and stages, and alterations of existing structures. Table 1, Organization of Buildings by Studio Era, on the following page organizes the extant and demolished buildings and structures according to the era of studio ownership through the end of 1946, when Selznick International Pictures suspended operations and ended the lease on the RKO-Pathé owned studio lot.¹²

B. EXISTING CONDITIONS

The Culver Studios site consists of approximately twenty acres of land in downtown Culver City. Thomas H. Ince initially purchased these twenty acres in 1918 as the main studio site with administrative offices and filming and production capability, plus an additional forty-acre back lot behind the main studio. The most prominent structures at this site are the massive production stages. Other significant structures consist of administrative offices and production support services.¹³

C. CRITERIA FOR EVALUATION OF HISTORIC RESOURCES

In analyzing the historic significance of properties located within the survey study area, both TSA and HRG utilized standard survey practices and significance criteria for designation under federal, state, and local landmark programs. The consultants also considered and applied the California Office of Historic Preservation survey methodology and instructions to evaluate the relative significance of properties.

¹¹ "Existing Conditions Report and Preliminary Environmental Analysis: The Culver Studios, by Historic Resources Group, 2006.

¹² Ibid.

¹³ Ibid.

Studio Era	Building/Structure Name
Ince (1918–1925)	
Extant	Administration Building (Building C)
Extant	Building D (original southern portion)
Extant	Building E
Extant	Building O (originally Stage No. 3)
Extant	Building U (re-located)
Extant	Building V (re-located)
Extant	Stage 10 (re-located)
Extant	Gate #2 (original Gate #1)
Extant	Gate #3
Extant	Gate #4
Demolished	Building A
Demolished	Building F
Demolished	Stage 1 (glass stage)
Demolished	*Stage 2 (glass stage), later known as Stage 5 and Bldg P, re-located
Demolished	Pool (original capacity)
Demolished	Water tower
Demolished	Paint shop
Demolished	Original Building J (Mill) (demolished 1992, replaced)
DeMille (1925–1928)	
Extant	DeMille Theatre
Extant	Building H (re-located)
Extant	Building I (re-located)
Extant	Building L
Extant	Building N
Demolished	Building R
Extant	Building W
Extant	Stages 2/3/4 (originally built as Stage 2)
Demolished	Stage 4, later known as Bldg Q

Table 1. Organization of Buildings by Studio Era (adapted from HRG Report, 2006)

Studio Era	Building/Structure Name
RKO-Pathé (1928–1935)	
Extant	Building X
Extant	Building Y
Extant	Building Z
Extant	Stages 7/8/9
Extant	Stages 11/12/14
Demolished	Building B
Demolished	Building G
Demolished	Building K
Demolished	Building M
Selznick (1935–1946)	
Extant	Building D (additional northern portion)
Extant	Building S
Extant	Building T
Extant	Stages 15/16
Structures Built Since 1988	
	Building P
	Stages 5 & 6
	New Commissary
	Gate #1
	Elevator Shaft/Plaza (behind Bldg C)
	Parking Structure (behind Stages 5 and 6)

1. National Register of Historic Places Criteria

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. Four criteria have been established to determine the significance of a resource:¹⁴

¹⁴ Guidelines for Completing National Register Forms, National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986 ("National Register Bulletin 16"). This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the National Register of Historic Places.

- A. It is associated with events that have made a significant contribution to the broad patterns of our history;
- B. It is associated with the lives of persons significant in our past;
- C. It embodies 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;
- D. It yields, or may be likely to yield, information important in prehistory or history.

A property eligible for the National Register must meet one or more of the above criteria. In addition, unless the property possesses exceptional significance, it must be at least fifty years old to be eligible for National Register listing.

In addition to meeting the criteria of significance, a property must have integrity. "Integrity is the ability of a property to convey its significance."¹⁵ According to *National Register Bulletin 15*, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.¹⁶ The seven factors that define integrity are location, design, setting, materials, workmanship, feeling and association. The following is excerpted from *National Register Bulletin 15*, which provides guidance on the interpretation and application of these factors:

- Location is the place where the historic property was constructed or the place where the historic event occurred.¹⁷
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.¹⁸
- Setting is the physical environment of a historic property.¹⁹
- 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.²⁰

¹⁵ National Register Bulletin 15, p. 44.

¹⁶ Ibid.

¹⁷ "The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved." Ibid.

¹⁸ "A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape." Ibid.

¹⁹ *Ibid*, *p.*45.

- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.²¹
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.²²
- Association is the direct link between an important historic event or person and a historic property.²³

In assessing a property's integrity, the National Register criteria recognize that properties change over time; therefore, it is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.²⁴

For properties which are considered significant under National Register Criteria A and B, *National Register Bulletin 15* states that a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).²⁵

In assessing the integrity of properties that are considered significant under National Register Criterion C, *National Register Bulletin 15* provides that a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.²⁶

²⁴ *Ibid*, 15, p. 46.

²⁰ "The choice and combination of materials reveals the preferences of those who created the property and indicated the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place." Ibid.

²¹ "Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques." Ibid.

²² "It results from the presence of physical features that, taken together, convey the property's historic character."

²³ "A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. . . Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register." Ibid.

²⁵ *Ibid.*

²⁶ "A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style." Ibid.

2. California Register of Historical Resources Criteria

To be eligible for the California Register, a historic resource must be significant at the local, state, or national level, under one or more of the following four criteria:

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

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.²⁷

Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.²⁸

3. California Office of Historic Preservation Survey Methodology

The evaluation instructions and classification system prescribed by the OHP in its *Instructions for Recording Historical Resources* provide a three-digit evaluation code for use in classifying potential historic resources. The first digit indicates one of the following general evaluation categories for use in conducting cultural resource surveys:

- 1. Listed in the National Register or the California Register;
- 2. Determined eligible for listing in the National Register or the California Register;
- 3. Appears eligible for the National Register or the California Register through Survey Evaluation;

²⁷ California Code of Regulations, California Register of Historical Resources (Title 14, Chapter 11.5), Section 4852(c).

²⁸ *Ibid.*

- 4. Appears eligible for the National Register or the California Register through other evaluation;
- 5. Recognized as Historically Significant by Local Government;
- 6. Not eligible for any Listing or Designation; and
- 7. Not evaluated for the National Register or California Register or needs re-evaluation.

The second digit is a letter code indicating whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number that is used to further specify significance and refine the relationship of the property to the National Register. Under this system categories 1 through 4 pertain to various levels of National Register eligibility. The California Register, however, may include surveyed resources through level 5 (e.g., properties evaluated as of local interest in the planning process even if they are ineligible for listing in the National Register, California Register, or a local register are given an evaluation code of 6.

4. City of Culver City Criteria

The City of Culver City Historic Preservation Ordinance (Municipal Code, Chapter 15.05) establishes criteria for designating local historic resources, referred to as "Cultural Resources," and/or historic districts. According the Ordinance, a potential Cultural Resource must meet one of the following criteria:

- The structure(s) is at least fifty (50) years of old and the exterior of the structure is accessible or visible to the public; or
- The structure or district has special importance to the City.

After satisfying the threshold criteria (above), the structure or district shall be reviewed for compliance with one or more of the following assessment criteria:

- Is the structure(s) of architectural significance;
- Is the structure(s) of historical or cultural significance;
- Do the structures in the district collectively meet one of the two assessment criteria.

Structure(s) or districts that meet the requirements of the criteria may be classified as "Recognized," "Significant," or "Landmark" properties, and will be classified as such by applying a ranking system adopted by the City Council.

The three classifications of Cultural Resource designation are as follows:

Landmark. A structure or district designated as an exceptional example of the highest architectural, historical, or cultural significance to the community.

<u>Significant</u>. A structure designated as being of substantial architectural, historical, or cultural significance to the community.

<u>Recognized</u>. A structure designated as being of architectural, historical, or cultural interest.

Historic districts may be designated "Landmark Districts," "Significant Districts" or "Recognized Districts." Their designation is derived from associations with events that have made significant contributions to the City, State, or national history or culture or because they are collectively significant examples of period, style, or method of construction that provide distinguishing characteristics of the architectural type or period represented.

D. SURVEY STUDY AREA DEFINED

The historic resources study area was identified based on the anticipated direct and indirect effects of the proposed project on potential historic resources. The study area for the proposed project was defined as the project site, which includes all of the previously identified and evaluated Culver Studios District contributing and non-contributing properties. Currently, the historic district comprises thirty-two (32) buildings and structures (see Figure 3 on page 3-11).

E. IDENTIFICATION OF HISTORIC RESOURCES WITHIN STUDY AREA

The project site/survey area has been previously assessed for historical significance. In 1987, Thirtieth Street Architects (TSA) completed survey fieldwork to prepare a historic resources report for the City of Culver City, under contract with the City's Redevelopment Agency. All individual structures on site were evaluated and ranked according to an A, B, C, D rating system, and inventory forms were completed for those properties fifty years of age or older (at the time of the survey).

As a result of the TSA historic survey, twelve structures, including Building C (the Mansion) and Building D, were identified as individually eligible for listing in the National Register with an "A" rating code. Since that time, one of the buildings in this category (Original Stage 1) has been demolished; leaving eleven structures eligible for individual listing in the National Register. Of those eleven structures, six were also identified as City of Culver City cultural resources (Building C, Building D, and bungalows S, T, U, and V). Nine additional structures were identified in the TSA survey as potentially "Significant" at the local level, including the DeMille Theatre. However, since the time of the 1987 survey five of the nine potentially "Significant" buildings have been demolished. As part of the TSA survey, eight

additional structures were identified as ineligible for any type of individual designation, though they were noted as possible contributors to The Culver Studios historic district. TSA concluded that all of the structures assessed in the survey area were considered contributing properties to the potential district.

Following the TSA survey, a Historic Preservation Advisory Committee (HPAC) was formed to review the 1987 survey work and develop recommendations for a historic preservation program in the City. As part of the work efforts of the HPAC, recommendations were made that preliminarily identified various residential and commercial properties within the City as potential historic resources. The Culver Studios District was one of two studio districts identified, the other being the Columbia Studios District (initially Metro-Goldwyn-Mayer Studios, now Sony Pictures), each with individually, locally designated "Landmark" and "Significant" structures on their sites.

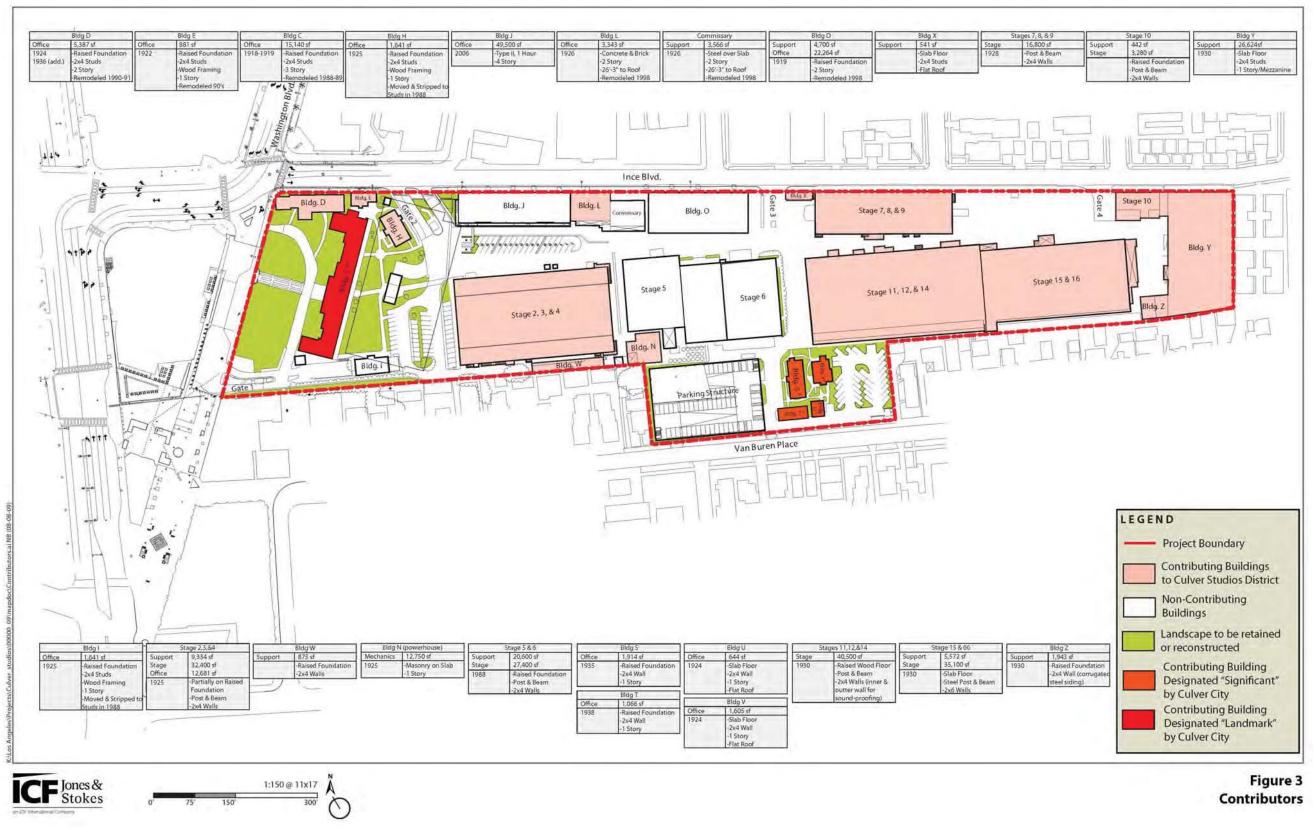
In 2006, HRG completed a formal survey of the studio lot previously assessed by TSA. HRG prepared an "Existing Conditions Report and Preliminary Environmental Analysis" that evaluated the buildings, structures, and features on the site for historical significance based on national, state, and local criteria. In addition, a preliminary analysis of potential project impacts for CEQA purposes was completed that took into account development of the site under the proposed Master Plan for the studio. The HRG evaluation determined that The Culver Studio site was eligible for listing in the National Register as a potential historic district with twenty-four (24) contributors under Criterion A (important historical associations). Since the time of the HRG survey, two properties have been demolished (buildings J and R). There are now twenty-two (22) contributing properties to the district.

1. Culver Studios District

a. Architectural Description

The Culver Studios property line follows an irregular rectangular outline, defined by a combination of gates, walls, fences and buildings. Beginning at Gate #1 in the northwest point of the studio lot the parcel line moves east along Washington Boulevard to Ince Boulevard. The southeasterly property line and most of the property line on the southwestern side abut residential properties with exception of a small portion of land on the southwestern side extending to Van Buren Place.²⁹ The rear walls of studio buildings periodically interrupted by brick walls, some with wood lattice rails, form the property line along Ince Boulevard. Along Washington Boulevard low brick walls with stout brick posts enclosed with painted wood lattice rails bounds the front lawn and curved driveway of Building C to the north. This fencing system represents

²⁹ Existing Conditions Report and Preliminary Environmental Analysis: The Culver Studios, by Historic Resources Group, 2006.



Summarized findings of the identified historic properties within the project/study area are listed in Table 2.

Address	Description	Year Built	OHP Rating
1.	The Culver Studios District	1918-1946	38
2.	Building C (the Mansion)	1918	3B/5S1
3.	DeMille Theatre (attached to Building C)	1924	3B/5S3
4.	Building D	1927	3B/5S1
5.	Bungalow S	1935	3B/5S1
6.	Bungalow T	1938	3B/5S1
7.	Bungalow U	1924	3B/5S1
8.	Bungalow V	1924	3B/5S1

Table 2. Identified Historic Properties within the Project/Study Area

35 - Property appears individually eligible for the National Register through a survey evaluation.

3B - Property appears eligible for the National Register both individually and as a contributor to a NR eligible district through a survey evaluation.

5S1 - Individual property that is listed or designated locally.

5S3 - Appears individually eligible for local listing or designation through a survey evaluation.

Source: ICR Jones & Stokes Corporation, [October 2010].

the northerly property line of the studio.³⁰ Trees set within the sidewalk easement define the property line along Ince Boulevard.

Buildings D, E, J, L, O, Y, X; Stages 7, 8, 9 and Stage 10; and guard gates 2, 3, and 4 are situated along the property line abutting the sidewalk on Ince Boulevard, and form the perimeter boundary with or without fences or walls. Several parcels were annexed during the RKO ownership along the southwesterly edge that extends the studio perimeter to Van Buren Place. This portion of property, which includes five bungalows and surface parking, is enclosed by a tall brick wall and two wood access doors.³¹

The Culver Studios historic district is composed of a variety of buildings and structures, some retaining a higher degree of integrity in design, workmanship, materials, and utilization. The buildings within this area reflect both the historic and contemporary uses of The Culver Studios lot and are considered the key defining features of the historic district. Each of these

³⁰ Ibid.

³¹ Ibid.

unique structures illustrate the types of activity required for a functioning studio lot: stages for film production; office buildings for administrative functions; dressing rooms for production support; support buildings for activities including set design, storage, and power; and a commissary.³²

The Colonial Revival style of the studio's "public" administration buildings to the north of the lot helps to distinguish these buildings from the larger "private" utilitarian style working production buildings to the south. The administration buildings incorporate wood lap siding, gable roofing systems, double-hung sash windows, and classic color schemes of the style (white base with complementary trim). In comparison, the studio buildings are voluminous shells with typical slightly arched roofs or flat roofs with parapets that are standard for that particular property type. Most of the structures are sheathed in stucco, devoid of any trim or detailing, and have limited exterior openings though at least one elevation on each of the structures has a large sliding door to allow props, sets, and scrims ingress and egress.

The studio lot consists of one major north-south thoroughfare for both pedestrian and vehicular traffic running north-south from the rear of Building C (the Mansion) south to Building Y, connecting smaller internal pathways on the lot. Building C, sited perpendicular to this major thoroughfare, has always shielded the internal workings of the lot from public view. Following the demolition of two large Ince-era stages and a realignment of the original "Y" shaped thoroughfare, the extant major linear thoroughfare and secondary pathways behind the Mansion have remained consistent since the 1930s. The alignment, configuration and functions of the District's internal traffic pattern reflect the studio's need to accommodate pedestrians as well as vehicles of varying sizes attending to a range of tasks and uses for the different studios and stages. The studio's traffic pattern is a physical record of its time and thus is considered a character-defining feature of the district.³³

Currently there are five secured gates that provide ingress to the studio site. Gates 2, 3, and 4 are distributed along Ince Boulevard, which has always assumed the bulk of studio lot traffic. Gate 2 serves as the primary entrance serving automobile traffic while Gates 3 and 4 are used primarily for production purposes. Gate 4 though closed during much of the time, is limited to production truck egress. Gate 5, located on Van Buren Place, is restricted to limited vehicular access. The guard shacks at Gates 1 and 2 were replaced with new Colonial Revival style kiosks in 1988 along with two driveway ramps, one near each gate, that lead down to an underground parking structure completed at the same time. Gate 1 is typically restricted to use by studio personnel. Gate 3 is considered a contributing feature to the historic district.

³² Ibid.

³³ During the Ince era, the major thoroughfare behind Building C was a north-south "Y" shape in plan. With the demolition in the 1930s of two large stages, replaced by new stages reoriented in plan, the western arm of the Y disappeared.

Since the 2006 HRG assessment a number of changes have occurred to The Culver Studios historic district, including the demolition of buildings R and J. Building R, a DeMilleera structure had a TSA rating of B+ and was considered a contributor to The Culver Studios historic district. It was removed for the construction of multi-story parking structure. Located on the west side of lot adjacent to Van Buren Street, this structure is not highly visible from the front of the studio and is difficult to see from within the lot as well (it is behind Stages 5 and 6 and Building P). Building J, an Ince-era structure, also had a TSA rating of B+ and was identified as a contributor to the district. The original Building J was replaced in 2006 with a new multi-story Building J of contemporary design in the same locale. Other changes to the studio include the addition of a below-grade parking structure with elevator shaft plaza behind Building C (the Mansion) and access ramps to the subterranean parking structure installed near Gate 2 and behind Gate 1. For the most part, these changes have not individually and collectively adversely impacted the cohesiveness of the historic district. Much of the original historic fabric and character is maintained and is still highly visible from the public right-of-way.

b. Evaluation of Significance

HRG evaluated The Culver Studios site in 2006, and determined that it qualified as a National Register eligible historic district with **24** contributors. With the later demolition of buildings J and R, the district now consists of **22** contributors. Despite this change, the property is also eligible for listing on the California Register and for local designation as a City of Culver City Landmark District. See Table 3 for Contributing Property Status and Ranking on the following pages.

According to the HRG report a majority of the buildings and structures on the site remain in their original locations since the established period of significance (1918-1946) or have been minimally altered despite ongoing production needs required on the studio lot. The overall site maintains a high degree of historical integrity including location, design, materials, setting, association, and feeling. In addition, it possesses a sense of the scale and proportion unique to a movie studio, and provides insight into the historical aspect of a working studio due to the high proportion of extant contributing resources. The contributing properties continue to dominate the studio site defining the site's status, purpose, and period of significance. Hence, HRG concluded that the district is eligible for National Register listing under Criterion A as a collective and cohesive representation of an early motion picture studio at the local level of significance.³⁴ Pursuant to the CEQA Guidelines, Section 15064.5(a), The Culver Studios District is, therefore, considered a historical resource.

³⁴ Existing Conditions Report and Preliminary Environmental Analysis: The Culver Studios, by Historic Resources Group, 2006.

2. Building C (the Mansion)

a. Architectural Description

Building C is also referred to as the Mansion or Administration Building. Built in 1918, the dignified building remains the oldest structure on the lot. In 1927, the DeMille Theatre was added to the east end of the building. The "Selznick wing" was added to the east end in 1936. This building is an outstanding example of 1920s Colonial Revival architecture, a good interpretation of Mt. Vernon architecture. It is the most visible and distinctive structure on the lot. The main section is two-stories high with a side facing gable roof. Single-story wings extend from each end and project, forming an overall "U" shaped building form. The exterior is clad with wide shiplap siding. Other features include a large pedimented front-facing gable, dormers, Chippendale-style balustrade, two-story high Doric columns, and multi-pane sash windows. Set deeply into the lot from Washington Boulevard, the building is further enhanced by its setting, a formal landscaped area in front of the Mansion, which includes a large brick pathway adorned by low clipped hedges and rose bushes. This pathway bisects the broad lawn, which also contains a wide circular driveway of decomposed granite and trees that dot the manicured lawn, and leads directly to the pedimented portico projecting from the Mansion. The Colonial Revival style administration building in such a generous a setting is a relatively intact and rare property type in southern California region although typical of similar well-appointed properties in southern and eastern United States.

b. Evaluation of Significance

The HRG survey identified Building C as eligible for National Register listing both individually and as a contributor to a potential historic district. This structure is also a designated City of Culver City "Landmark" and as such is considered a local cultural resource. Since the property has been acknowledged as National Register eligible and has also been formally determined historically significant in a local register it is considered a historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

3. Building D

a. Architectural Description

This example of the Colonial Revival style is a two-story structure clad in horizontal wood siding and is located immediately east of the Mansion. Building D has a large rectangle shape footprint, which is crowned by a low-pitched cross-gable roof. Positioned symmetrically on the south elevation, rows of six-over-six double-hung wood windows are used singly and in pairs on both the ground and upper floors as well as on both north and south facades. A pedimented gabled portico, supported by round Doric columns shelters the wood paneled front door. The porch and stairs are of standard size red brick. The north façade features two large

Use by Property Type (historic)	Building/ Structure Name	Studio Era	1987 Ranking	Contributor Y/N
Stages	Stage 2/3/4	DeMille	A+	Y
Ŭ	Stage 5 & 6	GTG (1988)	N/A	N
	Stage 7/8/9	RKO-Pathe'	A+	Y
	Stage 10	Ince (re-located)	**	Y
	Stage 11/12/14	RKO-Pathe'	Λ+	Y
	Stage 15/16	Selznick	Λ+	Y
Administrative ^a	Building C	Ince	Λ+	Y
	DeMille Theatre	DeMille	B+	Y
	Building D	Ince/ Selznick	A+	Y
	Building E	Ince	B+	Y
	Building H	DeMille (re- located)	B+	Y
	Building I	DeMille (re- located)	B+	Y
Dressing Rooms/ Bungalows	Building W	DeMille	**	Y
	Building R (demo)	DeMille	B+	Y
	Building S	Selznick	A+	Y
	Building T	Selznick	A+	Y
	Building U	Ince (re-located*)	Λ+	Y
	Building V	Ince (re-located*)	Λ+	Y
Process ^b	None remain			
Support ^c	Building J (demo)	Ince	B+	Y
	Building L	DeMille	A+	Y
	Building N	DeMille	C+	Y
	Building O	Ince	C+	N
	Building P	GTG (1988)	N/A	N
	Building X	RKO-Pathe'	C+	Y
-	Building Y	RKO-Pathe'	C+	Y
	Building Z	RKO-Pathe'	C+	Y

 Table 3. Contributor Status and Ranking (excerpted from HRG Report, 2006)

Use by Property Type (historic)	Building/ Structure Name	Studio Era	1987 Ranking	Contributor Y/N
Service ^d	Commissary	GTG (1988)	N/A	Ν
Other	Gate #1	GTG (1988)	N/A	N
	Gate #2	Ince	**	N
	Gate #3	Ince	**	Y
	Gate #4	Ince	**	N
	Elevator Shaft	GTG (1988)	N/A	N
	Parking Structure	PCCP (2006)	N/A	Ν

^d Administrative and office uses. ^e Editing and production uses. ^d Support uses include: costumes, mill, set design, power buildings, film vaults, scene docks, storage, water tower, pool. ^d Service uses include: commissary, hospital. ** Not included in the 1987 survey. "Demo" = demolished. Building J demolished, replaced with new Building J (2006), non-contributor. GTG: Grant, Tinker and Gannett; PCCP: PCCP Studio City Los Angeles.

single-story, multi-pane curved bay windows accented along the bottom with vertical wood siding. This is a contrast to the lapped horizontal wood siding surrounding these bay windows. A large red brick chimney is located on this north side of the structure.

b. Evaluation of Significance

As with Building C, Building D was found to be individually significant for National Register listing by HRG. It was also identified as a contributing property to The Culver Studios historic district. In addition, the City of Culver City designated the property a "Landmark" structure. Since the property has been formally determined historically significant it is considered a historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

4. Bungalow S (Building S)

a. Architectural Description

Following the Colonial Revival theme set by most of the buildings on the studio lot, Bungalow S (Building S) has wide wood lap siding, wood-frame double hung windows, a hip roof, and a pedimented front stoop supported by elongated Doric columns.

b. Evaluation of Significance

This building was built in 1935 during the Selznick studio era as a residential bungalow for stars Clark Gable and Vivien Leigh during the filming of "Gone with the Wind." It has been designated by the City of Culver City as a "Significant" structure. Hence, it is considered a local

cultural resource. HRG also identified this structure as National Register eligible for individual listing and as a contributor to a potential historic district. Since the property has been determined historically significant it is considered a historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

5. Bungalow T (Building T)

a. Architectural Description

A slight variation of the Colonial Revival theme is seen in Bungalow T. Like Bungalow S, it was constructed several years after Building C (the Mansion). Wide lapboard trimmed with corner boards covers the exterior walls. The side facing gable roof features enclosed eaves and returns. Small pedimented, gabled porticos extend from the east and south elevations. A pair of matching doors is centered in the north end while a single wood panel door is located under the portico to the east side. Fenestration includes small wood frame nine-light windows with plain surrounds. A small yard surrounds the bungalow.

b. Evaluation of Significance

Many actors, including Olivia de Havilland, used this building containing dressing rooms until it was converted to office space. The City of Culver City has designated Bungalow T as a "Significant" structure and as such is considered a local cultural resource. The property was also assessed as National Register eligible for individual listing and as a contributor to a potential historic district. Because the property has been identified as historically significant it is considered a historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

6. Bungalow U (Building U)

a. Architectural Description

A flat roof with unbroken parapet caps the single story stucco-clad Moderne style building called Building U. Small double hung windows edged with narrow molding and set flush with the exterior walls punctuate each elevation. A plain door sheltered by a horizontal Moderne style flat canopy is centered along the primary (front) façade. A wooden water heater addition on the front is an obvious alteration.

b. Evaluation of Significance

Bungalow U was built in 1924 and was initially the gym/steam room for the Gloria Swanson Building (Building V) before converting into office space. It was also associated with Orson Welles during the filming of "Citizen Kane." The City of Culver City has designated this building as a "Significant" structure and as such is considered a local cultural resource. This building was also identified by HRG as eligible for listing in the National Register both individually and as a contributor to a potential historic district. Since the property has been determined historically significant it is considered a historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

7. Bungalow V (Building V)

a. Architectural Description

A narrow border edges the top of the unbroken parapet of this stucco-clad building. The front is single-story unit though a flat roof second story is at the rear. A flat roof porch supported by square wood posts occupies the southeast corner of the dwelling. Double hung sash windows are used throughout the building. Narrow horizontal banding accents the face above the windows and at wainscot height. A small yard and picket fence surround the structure.

b. Evaluation of Significance

Building V was built in 1924 and is associated with Gloria Swanson. Blake Edwards Productions later used it. Bungalow V has been designated a "Significant" structure by the City of Culver City and as such is considered a local cultural resource. The property was also assessed as National Register eligible for individual listing and as a contributor to a potential historic district. Because the property has been identified as historically significant it is considered a historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

A. THRESHOLDS OF SIGNIFICANCE AND CRITERIA FOR ADVERSE IMPACTS

1. CEQA Guidelines

The CEQA Guidelines state that a project involves a "substantial adverse change" when one or more of the following occurs:

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.³⁵
- The significance of a historical resource is materially impaired when a project:³⁶
 - a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
 - b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
 - c. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Secretary of the Interior's Standards for Rehabilitation (Standards) are codified at 36 Code of Federal Regulations (CFR) Section 67.7. The Standards are designed to ensure that rehabilitation does not impair the significance of a historic property. In most circumstances, the Standards are relevant in assessing whether there is a substantial adverse change under CEQA. Section 15064.5b(3) of the CEQA Guidelines states in part that "... a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of

³⁵ State CEQA Guidelines, 14 CCR Section 15064.5(b)(1).

³⁶ State CEQA Guidelines, 14 CCR Section 15064.5(b)(2).

the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource."

B. SECRETATRY OF THE INTERIOR'S STANDARDS FOR REHABILITATION

The definition of "rehabilitation" assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features, or finishes that are important in defining the building's historic character.

The Standards are as follows:

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
- 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
- 3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- 4. Changes to a property that have acquired significance in their own right will be retained and preserved.
- 5. Distinctive materials, features, finishes, and construction techniques or examples of skilled craftsmanship that characterize a property will be preserved.
- 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- 7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- 8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- 9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- 10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The Guidelines for Rehabilitation of Historic Buildings (Guidelines) were developed by the Department of the Interior's National Park Service to assist property owners and managers in applying the general Standards listed above. The Guidelines contain a specific hierarchy for decision-making in assessing the rehabilitation of any historic building. First, the significant materials and features of a building must be identified. Then a method for their retention and preservation must be found. If the physical condition of character-defining materials warrants additional work, repair is recommended. If deterioration or damage precludes repair, then replacement can be considered.

The introduction to the Guidelines states that:

Some exterior and interior alterations to the historic building are generally needed to assure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features, or finishes.³⁷

A technical brief describing how to identify the character-defining features of a building notes:

A complete understanding of any property may require documentary research about its style, construction, function, its furnishings or contents; knowledge about the evolutionary history of the building. Even though buildings may be of historic, rather than architectural significance, it is their tangible elements that embody its significance for association with specific events or persons and it is those tangible elements both on the exterior and interior that should be preserved.³⁸

In addition to the rehabilitation of key character-defining features, the Standards and Guidelines also address alterations and additions to historic buildings, as well as retrofitting for health and safety requirements. Some interior and exterior alterations to a historic building may be needed to assure its continued use. These modifications should not, however, obscure character-defining features of the structure.

C. PROPOSED PROJECT

The proposed Project consists of two phases and includes components that have the potential to affect historic resources: 1) potential direct impacts to The Culver Studios Historic District; 2) potential direct impacts to Building C (the Mansion); 3) compatibility of Project design with the Culver Studios Historic District (potential indirect impacts); and 4) potential impacts to historic view corridors.

³⁷ Weeks and Grimmer, The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (Washington, D.C: U.S. Department of the Interior, National Park Service, 1995.

³⁸ Lee Nelson, Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character, Preservation Brief 17, U. S. Department of the Interior, Preservation Assistance Division, 1988, page 1.

Under Phase I four existing buildings, Building L, Building O, Building X, and the current Commissary, would be demolished within The Culver Studios District. A new support building (referred to as Building 5), a new commissary, the re-configuration of Gate 3, and an underground parking structure beneath the front lawn of Building C (the Mansion) that includes a driveway ramp exiting out to Washington Boulevard, new stairwell access connecting the subterranean parking structure to the at-grade front lawn of Building C, and an elevator shaft near the western property line adjacent Gate 1 are the major new components that comprise Phase I. To allow for the construction of the underground parking structure the front lawn of Building C (the Mansion) would be removed then rehabilitated after its completion. In addition, no major circulation patterns within the District would be substantially altered as part of the Project. Phase I would occur approximately within the next five (5) years.

While conceptual in design, Phase II would include the replacement of three buildings, Stage 10, Building Y, and Building Z, for the construction of additional office and support facilities proposed as buildings 8 and 9. In addition, Stages 2, 3, and 4 would be renovated and expanded at its north end with a moderate size, multi-story addition (referred to as Building 3).

Depending on the design, compatibility and execution of Phase 1, and later Phase II, potential adverse impacts to identified historical resources may occur. In the following paragraphs potential direct and indirect effects to identified historical resources are discussed in terms of impacts to character-defining features and overall historical significance.

1. Proposed Project Phase I

a. The Culver Studios District

As previously mentioned, the grouping of buildings, structures, objects, and features that comprise The Culver Studios District has been previously identified as eligible for National Register designation as a potential historic district. In total there are thirty-two (32) properties within the district, of which twenty-two (22) are currently considered contributing resources. For the purposes of CEQA, this collective entity is considered a historical resource pursuant to the CEQA Guidelines.³⁹

Under Phase I of the proposed project four properties within the historic district would be demolished: 1) Building L, a contributor; 2) Building O, a non-contributor; 3) Commissary, a non-contributor; and 4) Building X, a contributor. The guard shack at Gate 3, a contributing feature, would be relocated and reused in the same basic location. In all, twenty (20) contributing properties to the District would be retained after implementation of Phase 1.

³⁹ California Environmental Quality Act Guidelines, 14 CCR Section 15064.5(a).

Building O would be replaced with a new multi-story support office (referred to as Building 5) with approximately 65,500 square feet of space. Building L and the Commissary would be removed for the construction of a new larger Commissary facility in the same locale as the existing commissary. In addition, the driveway at Gate 3 would be reconfigured with the existing guard shack (district contributor) reused and Building X removed for additional production vehicle parking. Building X is a contributor to The Culver Studios District and as such, its demolition is considered a significant adverse impact.

If the proposed work is conducted in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation then significant adverse impacts to The Culver Studios are avoided. The following analysis addresses the development plan for Phase I proposed for within the District in terms of the Standards and the National Register seven qualities of integrity. Utilizing these guidelines and thresholds ensures that those physical characteristics of the historic property (The Culver Studios District) that convey its historical significance and justify its eligibility for inclusion in the National Register, California Register, and local register are not materially altered or demolished in a *substantially* adverse manner. The National Register traditionally recognizes a property's integrity through seven aspects or qualities: location, design, setting, materials, workmanship, feeling, and association.

Location. These two proposed buildings, the Commissary and Building 5, share the same locations as their predecessors, office/storage buildings L and O and the lot's current The additional square footage in proposed Building 5 is primarily commissary facility. accounted for by the division of space into floors for offices in contrast to the largely undifferentiated space of existing buildings L and O. Overall, the new buildings are compatible with the District in their location. The proposed new uses will be basically the same as they were historically in the same location, which is in accordance with the Secretary's Standards and consistent with the District. The reconfiguration of Gate 3, however, also involves the relocation and reuse of the security guard shack. Since Gate 3 and its associated guard shack will be in the same general vicinity as they were historically, no significant adverse impacts will occur to this contributing feature of the District. Phase I of the development proposal also calls for the demolition of Building X, a contributing property to the District. In order to avoid an adverse impact to the District, the retention in-place or relocation of this structure must be considered in the planning process. The relocation of structures on the lot was standard practice historically and, hence, would be compatible with the use and function of the studio. If this building was retained in-place or relocated this aspect of integrity for the District would not be substantially compromised.

Design. The four-story Building 5 and the two-story Commissary share virtually the same massing, scale, proportions, and heights as their predecessors. The overall design of the District elevation for Building 5 is in some aspects similar to the district elevation of Building J, a non-contributor built in 2006. Though, the design of Building 5 is tempered and distinguished from Building J, Building 5 and the new Commissary are divided into discreet, articulated

volumes that serve to break up the massing of this new development, adding variety in character with the District's history of buildings whose form is a pragmatic expression of use and need. On the west (District-facing) elevation, the monolithic rectangular volume of Building 5 has a horizontal design that is emphasized by the rows of exterior walkways and metal railings. This massing, however, is relieved by the incorporation of an open stairwell, large expanses of concrete/plaster panels that are punctuated by varied window openings, and the asymmetrical utilitarian design of the adjacent commissary facility to the north. Such a design and use of materials help to convey a sense of bulk and massing similar to the other large utilitarian structures in the immediate area.

The south elevation of proposed Building 5, which is not visible from either Washington or Culver boulevards (the two main public rights-of-way), includes a prominent projecting cantilevered volume three stories tall. This elevation has no exterior walkways and is treated as a wall punctuated with floor-to-ceiling fenestration banded by galvanized metal panels set relatively flush to the wall plane in neutral concrete tones. While such a large cantilever is uncharacteristic of the District, projecting volumes can be seen on the north elevation of Building D (a contributor) as well as to other production facilities within the studio lot. In addition, the use of galvanized metal has also been utilized elsewhere within the lot as evident on Building Z (a contributor).

Taking its design cue from the west elevation of Building 5, the east elevation is predominately clad with a variant wall plane of concrete/plaster panels punctuated by fixed fenestration and vertically stacked recessed balcony areas. As with the building's west elevation the use of large expanses of concrete/plaster panels helps to maintain a sense of bulk, massing, and spatial relationships similar to the older stage facilities on the lot.

The two-story Commissary is distinguished from Building 5 by the inclusion of large alternating concrete wall sections that recall the large expanses of stucco walls seen on the various stages throughout the District. An open stairwell, centrally located along the west elevation and oriented north, projects from the terminus of the open walkways of the new Commissary building. Open stairwells are typical of the district and the proposed open stairway for the Commissary and Building 5 are, therefore, compatible in design with the character of the District.

With the removal of Building X for a larger production vehicle parking lot, a new wall will be installed just south of Gate 3. Currently, the eastern wall of Building X serves as a de facto wall along Ince Boulevard. Because of its contribution to the studio, the loss of Building X is considered an adverse affect to the overall historic district unless mitigated. If Building X was relocated elsewhere on the lot the construction of a new wall along Ince Boulevard may then occur. Measuring approximately eight feet tall and 45 feet long, the design of the new wall alternates solid sections of plastered masonry and an open grid of metal rails to allow public views into the activities of the studio lot. The new wall, therefore, would be differentiated from

the old in terms of design, but compatible in terms of color, height, placement, and texture with the overall features and character of the District. And while this new wall will be visible from Ince Boulevard, a secondary elevation to the District, it will not be evident from the two key public rights-of-way along Washington and Culver boulevards. Nonetheless, this wall may not be realized until the impacts to Building X are fully addressed.

Comprehensively, the design of the new buildings and the wall are consistent with the Standards. The new work is designed to be clearly differentiated from the historic property and so that its character-defining features are not radically changed, obscured, damaged, or destroyed. Hence, this aspect of integrity would not be substantially altered as a result of the new development proposal.

The existing structures immediately surrounding Building 5 and the Setting. Commissary are characterized by volumes largely distinguished not by arresting features or paint color, which is uniform, but by size; shape; proportions; massing; and roofline, befitting their status as the studio's "film production center" with no one building dominating another aesthetically. The new buildings are oriented in the same north-south manner as the original buildings were historically. They address the interior corridor of the district and do not impose a grade change or other incompatible features into the setting. By muting the tones, sheen, values and colors specified for the new buildings they will not radically compromise the overall historic setting of the District. The pedestrian activity in and out of the Commissary between early morning and afternoon, with people sitting outside on both the west and east elevations, is unlikely to change, although foot traffic to Building 5 will possibly increase. The roof garden above the new Commissary alters the utilitarian setting somewhat in creating a garden area two stories above the ground plane, but not sufficiently enough to negate the overall compatibility of the setting. Consistent with the Standards, this minor landscape element is also reversible and can be removed at anytime. In addition, no new traffic patterns or the alteration of existing traffic patterns are proposed. The historic relationship between the buildings and main thoroughfare of the studio will, therefore, be preserved. In consideration of the development plan for Phase I, this aspect of integrity would not be substantially altered.

Materials. The primary physical elements that were utilized in the design and making of the studio and that are still present from the historic district's period of significance includes the use of wood, plaster/stucco, glazing, and corrugated metal. The materials proposed for Building 5, the Commissary, and the wall adjacent Gate 3 include lightly textured concrete/plaster in varying tones of grey; large expanses of glazing in four shades of transparent clear (light grey, light green, light blue, and medium green); and galvanized or corrugated metal. The use of these materials are intended to be compatible, yet express a contemporary approach to the existing utilitarian and semi-industrial materials palette of the studio lot. As stated in the Standards, "radically changing the type of paint or coating or its color" and "radically changing the type of

finish or its historical color" is not recommended.⁴⁰ However, the proposed muted color scheme of whites, off whites, and other complementary colors will complement the historic color palette of the adjacent buildings and, therefore, strengthen the compatibility of the proposed work with the historic character of the district.

As a result of the proposed Project, this aspect of integrity would not be substantially altered and those features that define the historic character of the district would not be compromised.

Workmanship. The workmanship of a movie studio is expressed in vernacular methods of construction for the varied buildings and structures that comprise such a property type. The required skill in building and adapting these structures for production purposes is unique to the industry. The workmanship of the contributing properties within the District is modest and lacks highly sophisticated configurations and ornamental detailing typically associated with such craftsmanship. In contrast, in response to the studio's changing needs for office and new technologies, as well as to requirements of contemporary building codes, the level of detailing for the new buildings is higher than that of the surrounding structures within the District, but the workmanship is comparable. Hence, this aspect of integrity would not be significantly altered or diminished from the implementation of the proposed Project.

Feeling. The District sense of a particular period in time and particular use is a result of the presence of the physical features that, taken together, convey the property's historic character as a movie studio. Composed of a variety of buildings in terms of size, shape, and mass they reflect both the historic and contemporary uses of The Culver Studios lot. Each of the structures illustrates the types of activity required for a functioning studio lot. The unique central thoroughfare running north-south from the Administration Building at the front (north) of the lot to Building 9 at the rear (south) also adds to the overall historic feeling of the District. With the retention or relocation of Building X, and the addition of the new buildings given their compatibility of scale, height, proportions, location, color, and massing the feeling of the District is expected to remain intact. Hence, this aspect of integrity would not be substantially altered as a result of the new project.

Association. The historical association within the District is evident given the presence of the extant contributing properties on the lot and the direct, on-going relationship to the motion picture industry. Though the introduction of Building 5 will slightly compromise this association, the remaining contributing properties are sufficiently intact to convey that historical association to an observer. Additionally, incorporation of mitigation measures recommended for Phase I will ensure the direct link between the historic property and that its important historical

⁴⁰Weeks and Grimmer, The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (Washington, D.C: U.S. Department of the Interior, National Park Service, 1995).

associations are not diminished. This aspect of integrity would not be substantially altered as a result of the new project.

Although the District would lose one of its 22 contributing structures (the substantially renovated Building L), decreasing the number of contributors to 21, the District as a whole would still retain many of those key qualities and physical characteristics that convey its historical significance. However, with the potential loss of Building X, mitigation measures would be required to offset any adverse impacts associated with the physical demolition of this contributing property if retention in-place or relocation on-site is proven infeasible by all interested parties involved with the proposed Project.

b. Building C (Mansion)

Under Phase I of the proposed project, Building C (the Mansion) would not be physically demolished, relocated or altered. Its immediate surroundings would not be materially impaired by the removal of existing Buildings L, Building O, or the construction of Building 5 or the new Commissary. However, the proposed changes to the front lawn for the construction of the underground parking structure could pose an adverse impact to this property if not executed in a manner consistent with the Standards.

The HRG Report notes that the "front lawn remains the major landscape feature" of The Culver Studios and that this "notable aspect" has been "consistently maintained" throughout the various modifications to the District. The report also emphasizes that the lawn is a "significant attribute to the historic viewscape of the studio site from Washington Boulevard," one of the most important vehicular and pedestrian arteries in Culver City. "The lawn reinforces the historic character of the studio site by maintaining the relationship between the studio buildings and the surrounding neighborhood, a relationship instituted during the initial site planning phase."⁴¹ The Building C, the Mansion, marks the intersections of Canfield Avenue and Washington, Culver, and Ince boulevards. Thus, the front lawn of the Mansion is a commanding element within the City's overall contemporary urban feeling of place. In effect, the front lawn is the public's "front door" to The Culver Studios.

According to photo documentation owned by The Culver Studios and the Los Angeles Public Library, the character defining features of the original landscaping, seen in photographs from the 1920s and 1930s, included clipped box hedges; bilateral symmetry and a strong axis established by a straight brick paved path perpendicular to Washington Boulevard. As it has since 1919, this formal processional walkway is a series of two parallel brick walkways flanked and centered by a very low clipped box hedge. The middle doubled row of box hedge contained flowering shrubs, possibly tea roses. The walkway leads directly to the Mansion's pedimented

⁴¹ Existing Conditions Report and Preliminary Environmental Analysis: The Culver Studios, by Historic Resources Group, 2006.

portico and a curved driveway, perhaps of decomposed granite, fronting Building C and entering and exiting on Washington Boulevard.

Additional landscape elements include a grass lawn and sycamore, fruit and cedar trees. This restricted palette, aided by specific pruning, helped establish a feeling of formality and restraint associated with the Southern Colonial Revival theme established by the architecture of Building C (the Mansion). It cannot be currently ascertained when the hedge behind the white lattice and brick fence was installed, but according to available public memory, it has been there for decades and may well date to within the period of significance.

Although the landscaping in this area has not been significantly altered for the last 90 years, the original integrity of the front lawn has declined with natural growth and lack of longterm appropriate maintenance. Additional plantings, added incompatible trees, and natural overgrowth have also diminished the clarity of the original landscape plan and have blurred the historic connection between Building C (the Mansion), the studio, Culver and Washington boulevards, and the City of Culver City. The proposed landscape design would remove the overgrown trees and hedges that are now dominant and are out of scale with the original landscape intent and rehabilitate the lawn with period-appropriate plantings based on historical physical and documentary evidence. The removal and subsequent planting of landscape elements would be done under the supervision of a licensed arborist. Under Phase I, the front lawn along with its landscape features would be removed, which would result in a substantial adverse change under CEQA if not conducted in a manner consistent with the Standards.

Currently, the front lawn retains a very high degree of integrity of *location, design, setting, workmanship, feeling* and *association*. The remaining aspect of integrity, *materials*, has declined over the decades, but not enough that it overwhelmingly diminishes its historic character.

As proposed, the new subterranean parking structure would be located just south of Washington Boulevard and north of Building D (the Mansion). The installation of this new (second) parking structure requires the removal of the landscaped yard, generally referred to as the front lawn, and the horseshoe-shaped driveway located in front of Building D. Besides the parking facility itself, the structure also includes an exit driveway leading up from the below-grade structure to Culver and Washington boulevards, a stairwell exit in the eastern portion of the front lawn, and a new elevator shaft near Gate 1. Once completed, the parking structure would be covered with soil and the historic front lawn rehabilitated to a period within the established period of significance (1918-1946) in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation.

More specifically, a 24-foot-wide driveway, open to the air and surmounted by a 42-inchtall retaining wall will flank the public sidewalk to the north, a portion of the front lawn to the south, and extend eastward approximately 90 feet from the brick-lined front walkway within the lawn area to the current location of the existing driveway exit at Culver and Washington boulevards. The current horseshoe shaped driveway once reinstated will be slightly modified at its eastern terminus to accommodate the new ramp, and will no longer function as an operational driveway. The staircase will provide access to the below-grade structure and will be protected by a 42-inch-tall retaining wall on three sides.

The following analysis addresses the development plan for Phase I proposed for within the District in terms of the Standards and the National Register seven qualities of integrity. If the proposed work is conducted in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation and those characteristics and integrity aspects that identify the property as historic are not materially altered then significant adverse impacts to Building C can be avoided. The National Register traditionally recognizes a property's integrity through seven aspects or qualities: location, design, setting, materials, workmanship, feeling, and association.

Location. With the implementation of this project component the location of the front lawn would not change. Once the underground parking structure is installed, the front lawn will be reinstated and rehabilitated in the same location as the original front yard location. Hence, this aspect of integrity would not be substantially altered as a result of the new project.

Design. In plan, the addition of the new exit driveway as part of the front lawn would appear to create a substantial adverse change to the historic significance of this principal component of the District and individually designated property. However, the public experience and views of the front lawn and Building C from the sidewalk in front of The Culver Studios and from the north side of Washington Boulevard and Canfield Avenue are primarily experienced in elevation, not in plan. Because Building C is elevated above the grade of the front lawn and accessed by a broad series of brick steps, the proposed driveway does not affect the available views of this resource.

To further "hide" the exit ramp and not radically change original historic views of the Mansion, the studio, or the character of the front lawn, the boxed hedges removed for the parking structure installation will be re-incorporated or replaced in-kind behind the front fencing system along all of Washington Boulevard and ivy or similar plant material will cover portions of the driveway retaining wall to the south and west as part of the landscape rehabilitation treatment plan. In addition, the retaining walls around the open staircase leading down to the underground parking structure will be covered in ivy or similar material as well. The proposed design of the gate across the exit driveway is in-kind and incorporates elements of the original brick and trellis fencing system. The elevator shaft, located on the western edge of the property line adjacent to Gate 1 is a relatively minor element within the proposed landscaping plan and will be designed in an architectural style consistent with the Colonial Revival style of Building C and the guard shacks. As planned, much of the original design of the front lawn area, including notable landscape features from the period of significance, will

be reincorporated and rehabilitated pursuant to the Standards. Nonetheless, the loss of a portion of the front lawn and driveway do compromise the design aspect of integrity, though not substantially. This work would be undertaken in such a manner that, if removed in the future, the essential form and integrity of this historic feature and its environment would be unimpaired.

Setting. The overall context and character of Building C and its front lawn is such that it plays a key role in identifying The Culver Studios as a monumental and important property within the City of Culver City. Designed as a complementary component to the Colonial Revival style Mansion with formal gardens and topiary shrubs and plantings, the front lawn remains the major landscape feature on the studio lot. A significant attribute to the historic viewscape of the studio site from Washington Boulevard, the lawn reinforces the historic and physical character of the studio site by maintaining the relationship between the studio buildings and the surrounding neighborhood, a relationship set early on during the initial planning of the site. Under the proposed landscape work many of the large trees identified from historic photographs will be preserved, temporarily removed, and replanted accordingly. Other, nonhistoric plantings will be removed in their entirety. As part of this work it is important that the setting associated with Building C and its front lawn, as well as the studio itself, are not compromised or diminished by the creation of new view corridors of the studio's noncontributing properties from the public rights-of-way along Washington and Culver boulevards. Utilization of the Standards for the implementation of the landscape plan proposed for the front lawn area will avoid any potential adverse impacts to Building C, the front lawn, and the district overall. This aspect of integrity may be altered as a result of the new project.

Materials. In reinstating much of the original design qualities and plantings to the front lawn, the proposed landscape plan would rehabilitate the aspect of materials to the Secretary's Standards in the following ways:

- The majority of trees, prominent elements of the existing landscaping, will be preserved, retained, and replanted as part of the landscape plan per historic documentation;
- The six existing sycamore trees, now located sporadically within the lawn area would be replanted in the locations more similar to locations seen in historic photographs from the period of significance;
- While one peach tree of the existing three, closest to Culver and Washington boulevards and obscuring views of Building C (the Mansion) would be removed, the two remaining peach trees to the south would be retained, temporarily removed, and then replanted in similar locations from where they were removed pursuant to historical documentation;
- An existing historic cedar tree would be preserved and replanted to its original location. Two existing and overgrown cedar trees in the southeast corner of the lawn,

obscuring the east end of Building C, would be removed. (See discussion under setting with regard to these two trees.)

- New clipped boxed hedges aligning the entire front entryway behind the brick and trellis fencing system, apparently original to the Selznick-era, and tea roses will be installed, replicating original plants and uses as reconstructed from historic photographs.
- During the construction of underground parking in this area, original plantings to be preserved and reused would be removed off-site and maintained under the care of a licensed certified arborist.
- The hedges between and flanking the brick pathway within the center of the front lawn will be removed and compatible, in-kind planting will be installed according to historic documentation. The goal of the work is to visually return the brick walkway and landscape feature to the period of significance.
- Based on historic photographs from the period of significance, a new formal, decorative garden will be constructed in the same location as an earlier decorative garden constructed during the Ince era.

The materials proposed for the driveway, exit gate, stairwell, and elevator shaft will be in-kind and compatible with the nature, style, and materials of the immediate environment within this portion of the studio lot. The use of uncharacteristic materials such as concrete and concrete block shall be avoided. In utilizing the Standards for this project component, this aspect of integrity would not compromised.

Workmanship. Workmanship in this context is elusive, but refers to the "craft" of executing the concept of the original historic landscape for the front lawn, seen in its symmetry, the formal layout and pruning, and the strong connection between Building C and street created by the relationships among the front pathway, the grass, trees and shrubs, the building's pedimented portico and broad steps leading to it. This aspect of integrity has been compromised over the years; however, much of the original landscape plan will be instated with the same workmanship and care as was done initially.

Feeling. The historic sense of Building C, the front lawn, and the studio when taken collectively convey their historic character and period of time. The retention of the original landscape and architectural designs of these features, as well as their materials, workmanship, and setting help relate the feeling of an early twentieth century motion picture studio. The introduction of new, incompatible features may compromise this aspect of integrity.

Association. Building C and its related front lawn help to establish a direct link between The Culver Studio's long association with the film and television industries and their continued importance in Culver City's social, economical, cultural history. Throughout the changes to the industries within the studio and to Culver City, the virtually unchanged front lawn maintains a visual and physical connection to that history, including the important figures and celebrities who worked at the studios. While the project will change the lawn, this aspect of integrity would not be substantially altered as a result of the proposed project.

In consideration of the overall work proposed for the front lawn area much of it would not cause a significant impact under CEQA. Because of design considerations and the incorporation of the Standards, the introduction of the stairway with enclosing walls leading to the new underground parking structure; the removal, replacement and rehabilitation of the front lawn; and the addition of a new elevator shaft along the western edge of the property near Gate 1 would result in minimal changes to those physical characteristics that define Building C and its associated front lawn elements as historically significant. The introduction of a new egress ramp/driveway, however, would remove and alter features, spaces, and spatial relationships that characterize Building C and the studio as historic properties. It is understood that some exterior alterations to a historic property are generally needed to assure its continued use; however, it is important that such alterations do not radically change, obscure, or destroy character-defining features. As such, mitigation measures are required to minimize the overall impact of the driveway/ramp's egress area along Washington Boulevard.

c. Building D

Under Phase I of the proposed project, Building D would not be physically demolished, relocated or altered. Its immediate surroundings would not be altered by any component of Phase I such that the significance of the building as a historical resource, individually and as a contributor to the District, would be materially impaired or its historical significance compromised. Phase I of the proposed Project would not involve a "substantial adverse change" under CEQA to this property and would, therefore, not be a significant effect on the environment. Therefore, no mitigation measures are required for Building D to implement the proposed project.

d. Bungalows S, T, U, V (Buildings S, T, U, V)

Under Phase I of the proposed project, Bungalows S, T, U, and V would not be physically demolished, relocated or altered. Their immediate surroundings would not be altered by any component of Phase I such that the significance of the buildings as historical resources, individually and as a contributors to the District, would be materially impaired or their historic significance jeopardized. Pursuant to CEQA, Phase I of the proposed Project would not involve a "substantial adverse change" to any of the bungalows and would, therefore, not be considered a significant effect on the environment. Therefore, mitigation measures are not required for Bungalows S, T, U, and V to implement the proposed project.

2. Proposed Project Phase II

Phase II is a future development project with an approximate time line of up to ten years. Because of the preliminary and conceptual nature of this portion of the Project, a thorough analysis of impacts to The Culver Studios District and buildings designated as Landmark Structures or Significant Structures cannot be conducted at this time. However, a general discussion of project considerations is presented below.

a. The Culver Studios District

Phase II proposes an addition (referred to as Building 3) to Stages 2, 3, 4, a contributing property to the historic district. Stages 2, 3, 4 is a large rectangular shape building comprising three full-height stages of varying dimensions). Other work proposed under Phase II includes the replacement of Building Y and Building Z (supporting buildings with workshops and sets) and Stage 10 (a stage much smaller than other stages in the District) with a new structure (proposed Buildings 8 and 9).

Proposed Building 3, the addition to Stages 2, 3, 4, would be a wedge-shaped, multistory building of approximately 31,000 square feet located on the north end of the existing structure. Just slightly lower than the Stage building to its immediate south, proposed Building 3 would be approximately the same width with varying proportions, differentiable shape, and an articulated facade. It would adjoin the largely blank north face of the Stage building and obscure and/or modify many elements of this primary elevation including its roofline, materials, and blank façade, which has been historically visible from the public rights-of-way of Washington and Culver boulevards.

Although existing contributing Stages 2, 3, 4 will not be demolished, and views of its other facades will still be available, the northern end of the Stage is the only elevation that can been seen from Building C as well as from Ince Boulevard near Gate 2. As noted in the HRG Report, "The Culver Studios' spatial relationship between the types of buildings and structures remains relatively unchanged." The spatial relationship between Building C (the Mansion) and Stage 2, 3 & 4, the Stage closest to the Mansion, exemplifies a feature emphasized in the Report: how each structure and its location illustrate the type, function, and activity associated with an aspect of studio production. The setting established by the proximity and views between the south façade of Building C and Stages 2, 3 & 4 (a working stage devoted to stagecraft in which windows are undesirable), exemplifies the close working relationship between administration and production. Additionally, the public view of this historic spatial relationship is available from Gate 2 on Ince Boulevard and more importantly, from Culver and Washington boulevards.

The replacement of this unique view of Stages 2, 3, 4 by a view of a new structure that would possibly be architecturally organized along the recent precedent of existing Building J and proposed Building 5 should be carefully considered for the final design of Building 3. Such a change to the setting may materially alter the District's integrity and its ability to convey its historic significance and therefore may result in a substantial adverse change to the significance of the historic district and a significant effect under CEQA. Any addition should be subordinate to the historic views available to the public, to the outlines of the roof and of the building, and to

the blank stucco walls of Stages 2, 3 and 4 in order to preserve the District's character. As the Secretary's Standard Ten states, "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property."

The other component of Phase II is the replacement of existing Buildings Y and Z and Stage 10 with proposed Buildings 8 and 9. The two proposed Buildings would define the south and southwest boundary of The Culver Studios. Totaling 70,000 square feet, they would replace existing contributing buildings Stage 10, Y, and the smaller Z. These buildings have a combined 32,389 square feet.

According to the HRG Report, Stage 10 is one of the site's oldest buildings, assumed to be constructed during the first phase of Ince's studio construction. Evidence suggests it was relocated in 1940 from where existing contributor Stage 15/16, the large stage to the northeast of Stage 10 and associated with the Selznick era, 1935–1946, is currently located.

Stage 10 exemplifies the HRG Report's characterization of the studio in which "each [structure] illustrates the type of activity required for a functioning studio lot." Despite the small wood-frame building's utilitarian character, architecturally it loosely refers to the Southern Colonial theme of Building C (the Mansion) building in its basic features. For example, Stage 10 is clad in wide-lapped wood board with a side-gabled roof and multi-pane windows that together indicate residential architecture. However, the addition of commercial/industrial "elephant" service doors accessed from a ramp on the west elevation indicates a use very different than that of housing. Additionally, compared to other stages on the lot, existing contributing building Stage 10's small size meant it could meet needs for other kinds of filming uses, thus also demonstrating the range of flexibility historically required by a large movie studio.

Contributing Building Y, 1930, dates to the RKO-Pathé era. The large, wooden shed-like structure, whose large interior timber framing is exposed, serves as a storage area for sometimes famous sets such as the "burning of Atlanta" scene in *Gone With the Wind* and has served as a general-purpose fabrication/maintenance shop since its completion. Contributing building, Building Z, 1930, dates to the RKO-Pathé era. It has remained in continual use as a scene dock since its completion.

Buildings Y and Z and Stage 10, though decidedly utilitarian and supporting, have remained in continual use since their completion. Though they represent an important aspect of the historical significance of the district, the 1987 survey assigned a "C" ranking to buildings Y and Z. Stage 10 was not included in the 1987 survey and, therefore, did not receive a ranking. Nonetheless, HRG identified all three buildings as contributors to the District.

While buildings Stage 10 and Z are quite small, existing contributing Building Y is a large, tall and wide building that also serves to anchor the District at the property's south end.

As conceptually designed, the removal of existing contributing buildings Stage 10 and Building Z would not be considered an adverse impact to the historic district and would not pose a substantial adverse change to the environment if mitigation measures for this scope of work were implemented that retained in whole or in part those physical characteristics that justify their historical significance as contributors to the District. Such measure may include relocating the structures to another location within the studio. As noted in the HRG Report, Table 2⁴², not only was the relocation of buildings common for the studios, Stage 10, an original "Ince" structure had already been relocated during the Selznick era, so such a relocation would be in keeping with the history of typical studio practice.

In contrast, the demolition of Building Y would be a substantial adverse impact to the District and would be considered a significant effect on the environment, unless appropriate mitigation measures in accordance with the Secretary of Interior's Standards are adopted. Without mitigation, the demolition of Stage 10 and Buildings Z and Y would result in a significant impact under CEQA.

b. Building C (the Mansion)

Under Phase II of the proposed project, Building C would be not be physically demolished, relocated or altered. While its immediate surroundings would be changed on the south side, a secondary elevation, the surroundings would not be materially impaired and Building C would continue to convey its historical significance. On the north side of Building C, the proposed removal of the front lawn during the construction of a new underground parking structure would constitute a material impairment of the historic resource and would involve a "substantial adverse change" to the environment. With the subsequent rehabilitation of the front lawn in accordance with the Secretary of the Interior's Standards, however, Phase II would not ultimately be considered a "substantive adverse change" under CEQA. Therefore, no mitigation measures are required for this building to implement this project component.

c. Bungalows S, T, U, V (Buildings S, T, U, V)

Under Phase II of the proposed project, Bungalows S, T, U, V would be not be physically demolished, relocated, altered and their immediate surroundings would not be altered such that the significance of the buildings as historical resources would be materially impaired. The proposed Project would not involve a "substantive adverse change" under CEQA and would not be a significant effect on the environment. Therefore, no mitigation measures are required for this building to implement the proposed project.

⁴² *HRG Report, Table 2, p. 10.*

3. Cumulative Impacts

"Section 15355 of the CEQA Guidelines states: 'Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. It further goes on to state that individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects taking place over a period of time."⁴³

Cumulative impacts on historical resources evaluates whether impacts of the proposed project and related projects, when taken as a whole, substantially diminish the number of extant resources within the same or similar context or property type. To the extent that other projects within The Culver Studios lot are proposed, as well as future projects proposed for other motion picture studios located in the City of Culver City could affect historical resources, adverse cumulative impacts may be expected. Therefore, mitigation measures are required to address potential cumulative impacts to this property that may occur in association with Phase I and Phase II of the proposed project.

⁴³ Title 14. California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act Article 20. Definitions, Section 15355, Cumulative Impacts.

A. CEQA MITIGATION APPROACHES

According to CEQA, mitigation may include:

- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
- Compensating for the impact by replacing or providing substitute resources or environments;⁴⁴ and
- Utilizing the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.⁴⁵

B. MITIGATION MEASURES

The following mitigation measures are required to ensure that potential direct and indirect adverse impacts to The Culver Studios District and the individual locally recognized "Landmark" and "Significant" properties would be less than significant:

1. General Requirements

Compliance. The applicant, monitored by the City's Community Development Department staff and applicant's preservation consultant, shall ensure that any portion of the Project will be carried out in compliance with the mitigation measures set forth in this technical document or the conditions of approval issued for the proposed project by the City's Community Development Department. The goal is to ensure that any development of the site will be compatible with the District's historic character and balances its significance with the programmatic, security, functional, and operational needs of The Culver Studios.

⁴⁴ CEQA Guidelines, Section 15370.

⁴⁵ CEQA Guidelines, Section 15064.5(b)(3).

Professional Qualifications. The applicant shall ensure that all work performed within the District or to any of the individually recognized local "Landmark" and/or "Significant" properties that has the potential to have an significant adverse impact or effect, directly or indirectly, is reviewed and approved by qualified individuals that meet the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61) for history, architectural history, architecture, or historic architecture and conservation prior to submitting documentation to the City for their review and approval.

Reporting. The applicant shall ensure that a report on each activity carried out pursuant to the stipulated mitigation measures is provided to the City's Community Development staff to verify completion of such work executed.

Monitoring. The City's Community Development staff shall be permitted at all reasonable times to inspect the properties that comprise the Culver Studios Historic District as well as the identified individually recognized local "Landmark" and/or "Significant" properties on site in order to ascertain if the mitigation measures stipulated herein are being observed accordingly.

2. Phase I Mitigation Measures

a. Culver Studios District

Design Review. Any maintenance, repair, stabilization, rehabilitation, preservation, reconstruction, or construction work within the district shall be conducted in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* by Weeks and Grimmer, 1995 (generally referred to herein as the Standards). Detailed design plans for Phase I of the project involving modifications to The Culver Studios District shall be submitted at the preliminary stage and final design stage to the Community Development Department staff for their review and approval prior to the issue of any entitlements, including demolition permits. Prior to each submittal to City staff, project plans must be reviewed, approved, and sign-off by the preservation consultant to acknowledge compliance of the respective mitigation measure.

Photography and Recordation: Prior to the issuance of any demolition permits the District and its contributing properties shall be photographically recorded using 35-mm black and white or digital photographs. The photographer should be familiar with the recordation of historic resources and the photographic requirements of the Historic American Buildings Survey (HABS) standards for field photography. The photographs along with the original negatives, if applicable, or if digitally recorded the material burned onto a compact disc shall be submitted to the Community Development Department for filing in their preservation archives.

Compatibility of New Construction: Where new construction is proposed within the District, the Standards shall be referred to and incorporated, as applicable. Consistent with the Standards, the proposed new construction shall be differentiated from the District and its contributors, but compatible in size, scale, massing, and proportions. Following the Standards the design, color, texture, and where possible the materials for the new construction may complement that of the District or any of its contributing features historically or contemporary in nature. Proposed project plans for Phase I shall be submitted at the preliminary design stage and final design stage to the City's Community Development Department staff for their review and approval prior to issuance of entitlements. Prior to each submittal to City staff project plans must be reviewed, approved, and sign-off by the preservation consultant.

Reuse. For Building X, which is a contributor to the District, preservation in place and adaptive reuse of the structure should be initially considered for feasibility prior to its relocation or demolition. Adaptive reuse of this building in its current location should be thoroughly explored by the applicant prior to addressing its possible relocation or demolition for additional vehicular parking. The feasibility study shall be undertaken in consultation with a historic preservation professional and City Community Development staff. If reuse in place is determined infeasible then sufficient information supporting this conclusion must be developed and submitted to the Community Development staff for their review and approval. If, however, reuse is determined feasible then any rehabilitation work to the building shall be conducted in a manner consistent with the Standards. The reuse and rehabilitation efforts shall be monitored by the historic preservation consultant and approved by the City's Community Development.

Relocation. If retention of Building X at its present location is proven infeasible then relocation of the structure to another compatible location within The Culver Studios District shall be considered by the applicant as the second option to preservation. The feasibility of relocating Building X shall be verified by both the historic preservation consultant and City Community Development staff prior to the issuance of any entitlements associated with this building. If relocation of this building is proven feasible then relocation efforts shall follow the guidelines of the Standards and the recommended approach to relocation by the National Park Service. The relocation efforts shall be monitored by the historic preservation consultant and approved by the City's Community Development Department. If relocation of the building is determined infeasible then sufficient information supporting this conclusion must be developed and submitted to the Community Development staff for their review and approval.

Re-design of Project Component. If retention in-place and/or relocation of Building X within the historic district is proven infeasible then the applicant shall re-design that portion of the proposed project involving Building X in order to retain it in its current historic location. Re-design efforts shall be made in consultation with a historic preservation consultation and each attempt reviewed by the City's Community Development staff for acceptability. If after three re-

design attempts by the applicant it is found infeasible to re-design this project component then the applicant may consider demolition of Building X.

Photography and Recordation: If it has determined by the Community Development Department that retention in-place, relocation, and re-design of Building X is infeasible and has also approved the building's demolition, then a recordation document of the structure shall be produced by the applicant prior to the issuance of the demolition permit. A HABS-like (Historic American Buildings Survey) document shall be prepared by the historic preservation consultant, and shall record the history of the building and its contextual relationship to the overall historic district. Its physical condition, both historic and current, shall also be noted in the document through the use of site plans, original as-built drawings (if available), historical maps, digital photographs, and written data and text. All document components, including photographs, shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation in outline format. Four bound archival copies of the report shall be provided to the City of Culver City Community Development Department for their files and distribution.

b. Building C (the Mansion)

Historic Landscape Design Review. Any short-term or long-term maintenance, repair, stabilization, rehabilitation, preservation, reconstruction, or construction work within the historic front lawn area of Building C, the Mansion, shall be conducted in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation as well as the Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes. Such work shall be reviewed and monitored by any landscape professional(s) with expertise in such fields as landscape preservation, horticulture, ecology, or landscape maintenance in consultation with the City's Community Development staff. Detailed landscape design plans for the work proposed for the front lawn of Building C under Phase I of the project shall be submitted at the preliminary stage and final stage to the Community Development Department staff for their review and approval prior to the issuance of any building permits associated with this specific work scope, including construction of the subterranean parking structure and removal of the existing front lawn elements. Prior to each submittal to City staff, landscape plans specific to the front lawn area must be reviewed, approved, and signed off by the preservation consultant to acknowledge compliance with the Standards and this particular mitigation measure.

Photography and Recordation: Prior to the issuance of building permits, including demolition, for the removal of the front lawn and construction of the underground parking structure, Building C and its associated front lawn and features shall be photographically recorded using 35-mm black and white or digital photographs. In addition, a progressive montage of photographs shall be developed to record the on-going work efforts associated with the removal, preservation, rehabilitation, and completion of the front lawn area landscaping,

including all hardscape and softscape features. The photographer should be familiar with the recordation of historic resources and the photographic requirements of the Historic American Buildings Survey (HABS) standards for field photography. The photographs along with the original negatives, if applicable, or if digitally recorded the material burned onto a compact disc shall be submitted to the Community Development Department for filing in their preservation archives.

Compatibility of New Construction: The Standards shall be referred to and incorporated where new construction, such as the shoe-shape driveway; front brick/trellis wall system; exit driveway/ramp, retaining wall and gate, stairwell railings; and elevator shafts, is proposed for the front lawn area. Consistent with the Standards, the work associated with these features shall be differentiated from the existing/original historic features, but compatible in design, color, size, scale, type, texture, and appearance to the historic front lawn and Building C. The treatment and design of the front brick/trellis wall system, exit driveway/ramp retaining wall and gate, stairwell railings, and elevator shafts developed in coordination with the preservation consultant with project plans signed acknowledging their approval of such work prior to submittal to the City. Project plans for the new construction features referenced in this paragraph shall be submitted at the concept design stage, preliminary design state, and final design stage to the City's Community Development Department staff for their review and approval prior to issuance of entitlements. Prior to each submittal to City staff, project plans must be reviewed, approved, and sign-off by the preservation consultant to acknowledge compliance of the respective mitigation measure.

c. Bungalows S, T, U, V (Buildings S, T, U, V)

No mitigation measures are required to implement the Phase I of the proposed project as no adverse impacts to Bungalows S, T, U, or V will occur.

3. Phase II Mitigation Measures

a. Culver Studios District

Though conceptual in nature at this time, the proposed work under Phase II may have a significant adverse impact on the historic district. In assessing potential indirect impacts of the proposed project on associated contributing resources there appears to be a potential to visually impact the historic district by the development of the multi-story support facility (Building 3) adjacent to Stages 2, 3, 4. In addition, the loss of three district contributors for the construction of a new building may adversely affect the cohesiveness and historic significance of the historic district.

Reuse. Adaptive reuse of Stage 10 and Buildings Y and Z should be considered initially for feasibility. The most effective means by which to mitigate the potential impacts resulting

from potential project development is to retain and reuse existing historic buildings. This is the first choice of preservation and is highly recommended over relocation or demolition of the properties. Therefore, adaptive reuse of the three buildings in place should be thoroughly explored prior to addressing their demolition. Any rehabilitation work shall be conducted in a manner consistent with the Standards. The applicant shall hire a qualified historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualifications Standards to review and assess adaptive reuse of the buildings with the applicant and City staff/officials.

Relocation. If retention of the three buildings at their present location is proven infeasible, relocation of the structures to another appropriate location within The Culver Studios District shall be considered as the second option to preservation. The feasibility of relocating Stage 10, Building Y and Building Z shall be assessed by both the qualified historic preservation consultant and City staff prior to the issuance of any permits for alteration or demolition. If relocation is proven feasible for any of the three buildings, then relocation efforts shall follow the guidelines of the Standards and the recommended approach to relocation by the National Park Service.

Re-design. If retention in-place and/or relocation within the historic district of Stage 10, Building Y and Building Z prove infeasible then the applicant shall re-design the proposed project for compatibility with the historic district. According to the Standards, the design of new construction onto or adjacent to historic properties should consider the resource's height, scale, orientation, massing, proportions, and where possible materials. Typical project impacts that may "disrupt or adversely affect...a property of historic significance" or cause a "substantial adverse change in the significance of a historic resource" may include the following:

- Demolition or substantial alteration without consideration of historic features;
- Incompatible massing, size, scale, or architectural style of new development on adjacent properties;
- Obstruction or extensive shading of significant views to and from the property by new development;
- Incompatible use of an existing structure;
- Disruption of integrity of setting;
- Long-term loss of access to the property.

The level of significance for an effect is dependent upon the existing integrity of the resource and the nature of the contributing elements to its historic significance. Therefore, as conceptually proposed, the new construction of the multi-story support facility (Building 3) may result in a direct and indirect impact to the District. Mitigation measures would be required to implement the proposed project as conceptually designed at this time. Feasible alternatives that

may lessen the indirect impact of the proposed project are possible and may include a redesign of the new structure that is more in line with the Standards, which state that new construction should be differentiated from the old and yet compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the historic property and its environment.

If new construction is proposed within the district then the new buildings should 1) occupy the same spatial area; 2) not visually or physically impact the overall historic character of the district or any historic viewsheds from the public right-of-way; 3) should be subservient in height, scale, and proportion to the contributing property(ies) in question; and 4) not substantially alter any major circulation patterns within the District. Re-design alternatives that address compatibility consistent with the Standards should be considered and approved by the City prior to implementation. If the treatment of the historic property and the design of the new work were consistent with the Standards then impacts to this historic resource would be less than significant.

Design Review. For any work proposed within the District the applicant and the Community Development Department staff shall review the proposed work to determine whether it may alter, directly or indirectly, any of the character-defining features of the district's contributing properties in a manner that would diminish the integrity of their location, design, setting, materials, workmanship, feeling, or association. If it is determined that potential impacts resulting from the proposed project would adversely impact such resources then additional design review by a historic preservation and City staff shall be required. Design review and respective submissions may be phased depending on the scope and scale of the undertaking. The applicant shall provide the City for their review design submissions at the concept design stage; the preliminary design stage; and the final design stage. All design submissions must comply with the Standards and be reviewed, approved and signed-off by a historic preservation consultant. Written comments shall be provided to the applicant by either or both the historic preservation consultant and City staff and considered and taken into account by the applicant prior to each design submittal. If necessary, a design peer review process may be implemented by either party to address any disagreements or questionable comments or requests regarding the design submittals and their associated comments.

Interpretive Educational and Public Art Component. To assist the public and other interested parties in understanding the history and significance of The Culver Studios an interpretive educational program (on-site or downtown Culver City exhibit, art piece, or other material, or on-line/CD interactive presentation) and/or 3-D public art program shall be incorporated into Phase II of the project by the applicant. This interpretive program and/or public artwork shall be created with the assistance of the historic preservation consultant and reviewed and approved by the City's Community Development staff. Content and design of the interpretive program and/or public art display/piece shall be specific to The Culver Studios District, specifically its history, importance, roll/function, architecture, and inter-relationship of the contributing features. The program/display may include but not be limited to: commemorative signage or plaques; historic photographs; oral histories; representative statues;

salvaged materials; models; educational, interactive computer programs or on-line internet display; annual exhibits, walking tours, or events; published information in the form of brochures, pamphlets, posters, postcards, videos, electronic media, etc.; or other relevant form of public display. This mitigation measure should be implemented and completed within one year of the issuance of any entitlements associated with Phase II. Depending on the design, content, substantiveness, and relevance of this mitigation measure to the City's public art program requirement for new construction, it may also satisfy that requirement. Consideration of compliance with the City's public art program, however, will need to be discussed and negotiated between the applicant and City staff for applicability.

b. Building C (the Mansion)

Other than the execution of the mitigation measures stipulated under Phase I no additional mitigation measures are required at this time to implement the Phase II of the proposed project as no adverse impacts to Building C are anticipated.

c. Bungalows S, T, U, V (Buildings S, T, U, V)

No mitigation measures are required to implement the Phase II of the proposed project as no adverse impacts to Bungalows S, T, U, and V are anticipated under this project component.

4. Cumulative Impacts

To avoid any potential cumulative impacts that may occur with the long-range development planning of The Culver Studios District or the individually recognized local Landmark/Significant properties, including those project components associated with Phase I and Phase II of the proposed project, a historic preservation management plan (HPMP) shall be developed by the applicant. The HPMP is a multi-disciplinary planning document that provides a forum to identify historic fabric on historic properties and the means to minimize its loss, damage, or any other type of adverse effects upon the identified historical resources. The HPMP shall be initiated within one (1) year after the issuance of the first demolition permit for Phase I and completed prior to the full planning and preliminary design stage of Phase II. The HPMP shall be developed in consultation with the applicant's historic preservation consultant and initially submitted in draft form for review and comment by the City's Community Development Department. The final HPMP shall take into account any comments or concerns provided by the City prior to its publication and utilization for future planning efforts at the studio, including Phase II of the proposed project.

The HPMP shall include at least the following components:

- Table of Contents
- Identification of Resource/Executive Summary

- Introduction
- Development History and Significance
- Architectural Descriptions, Evaluations and Identification of Character-Defining Features
- Analysis of Existing Conditions/Site and Landscape Evaluation
- Maintenance Requirements
- Code and Accessibility Review
- Structural Evaluation
- Building Systems Evaluation
- Materials Identification
- Treatment and Use
- Proposed Work
- Prioritization and Cost Estimate
- Maintenance Plan (short-term/long-term)
- Record of Treatment
- Drawings and Photographs
- Bibliography
- References
- Appendices

The HPMP shall be produced in accordance with the Secretary of the Interior's Standards and Guidelines for Preservation Planning, Secretary of the Interior's Standards for Rehabilitation, the National Park Service's Preservation Briefs and Tech Notes, the California Office of Historic Preservation standards and guidelines for preparing historic structures reports, and other similar reference materials.

The essential purpose of the HPMP shall be to establish processes for integrating the preservation and use of the historic properties on site with the long-range planning and development goals of The Culver Studios in a manner appropriate to the nature of the historic properties involved, the nature of the studio, and the nature of the studio's future planning goals, objectives, and planning processes. Potential cumulative impacts associated with Phase I and II of the overall project would be mitigated to a less than significant if implemented as proposed.

Chapter 6. Level of Significance After Mitigation

Under CEQA, implementation of the mitigation measures proposed for Phase I and Phase II of the project would reduce any potential significant impacts to the identified historic resources to a less than significant level. Implementation and completion of the proposed mitigation measures stipulated in this report would assure that those important qualities of the identified resources that convey their historical significance are not substantially altered and, therefore, would compromise their listing or eligibility for listing on the National Register, California Register, and/or local City of Culver register. Without the utilization of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* and the mitigation measures stipulated herein potential significant adverse impacts would occur to The Culver Studios District and individually locally recognized "Landmark" or "Significant" structures under both Phase I and Phase II of the proposed project.

Appendix

Historic Resources Group: Existing Conditions Report and Preliminary Environmental Analysis Report for The Culver Studios (2006)

The Culver Studios: Comprehensive Plan Amendment #6 by Gensler Architecture & Planning, April 16, 2010, revised October 2010 (includes landscape design plans)

Historic Resources Group: Existing Conditions Report and Preliminary Environmental Analysis Report for The Culver Studios (2006)

EXISTING CONDITIONS REPORT AND PRELIMINARY ENVIRONMENTAL ANALYSIS

The Culver Studios

Culver City, California



Prepared for: The Culver Studios 9336 W. Washington Boulevard Culver City, California 90232

Prepared by: HISTORIC RESOURCES GROUP 1728 N Whitley Avenue Hollywood, California 90028

EXISTING CONDITIONS

The Culver Studio site today consists of approximately twenty acres of land in downtown Culver City. Thomas H. Ince initially purchased these twenty acres in 1918 as the main studio site with administrative offices and filming and production capability, plus an additional forty-acre back lot behind the main studio site for filming. The most prominent structures at this site are massive production stages. Other significant structures consist of administrative offices and production support services.

Brief History

Ownership

There have been multiple owners of The Culver Studios over the last eight decades. Originally developed by Thomas H. Ince in 1918, this became the second major motion picture concern in Culver City. After Ince's sudden death in 1924, his widow sold the studio to Cecil B. DeMille. From February 1925 through 1927, DeMille ran the Culver Studio site, overseeing the first large-scale site renovations, including construction of the DeMille Theatre. In 1928 a conglomerate of several companies, known as RKO, took over the studio lot, and by the end of 1930 two of the subsidiaries merged to form RKO-Pathe' studio era. Selznick International Studios leased the entire site from 1935 to 1946, although it was still held by RKO-Pathe'; more renovations were commenced during Selznick's leadership at the studio site.

When Selznick International suspended operations, RKO-Pathe once again ran the studio site, leasing space to Selznick's new Vanguard pictures company, amongst other various

independent production companies. Howard Hughes bought the studio site in 1950, leasing out the space for productions. Following Hughes' ownership, Desilu productions purchased the site in 1957. After several owners in the intervening years, the studio was acquired by Columbia Pictures Entertainment Inc. in 1991, followed by the most recent ownership change of The Culver Studios in April 2004.

Site Development

Paralleling the contraction and expansion of the lot acreage, the main studio site underwent a variety of configurations, consistent with motion picture studio lots during this time. A small land addition was made to the main studio site in the early years of the studio site. Sometime between 1929 and 1931, RKO acquired several parcels of land on the western edge of the main studio site, according to a Sanborn

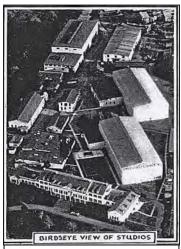


Figure 1: Aerial View, during Ince Studio Era. Photo courtesy of Bison Archives, 2005.

map from 1929 and an aerial photograph dated 1931.

A requisite component of the motion picture production studios are the back lots, where different scene backdrops and sets were built for filming purposes. The old back lot connected with present-day Culver Studios covered forty acres south of the main studio lot. It was best known as the site where Atlanta burned during filming of "Gone with the Wind". As the

needs of the industry motion evolved. the owners of the studio site (Perfect Film and Chemical) sold off the back lot in 1968.



Major Periods of Renovation

Thomas H. Ince's studio initiation was followed by three phases of development. Exhibit E, located at the end of this document, shows the site layout of the 1924 Sanborn map. An aerial photograph depicting the studio layout at this time is provided in Figure 1: *Aerial View, during Ince Studio Era.*

When DeMille took over the site in early 1925, the first massive site renovations were initiated. He re-oriented the existing glass stages and moved numerous office bungalows

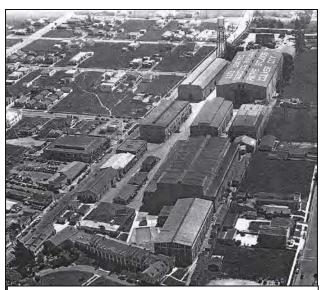


Figure 3: Aerial Photograph, RKO Studio Era. Photo courtesy of Bison Archives, 2005.

and production service buildings. To match production needs, Stage 2 (now known as Stages 2/3/4), four new double-barrelled projection rooms and seven new cutting rooms were added to the studio site. See Exhibit F for a site plan during this studio era.

The second significant period of renovations on the site began in 1930 with the merging of two companies to form the RKO-Pathe' Studio. Figure 3 Aerial Photograph, RKO Studio Era displays the site design at this talking time. In 1929 movie technology brought a change to the motion picture industry, which involved different methods of

production and a rise in consumer demand for movies. The new production company adapted to this innovation by constructing two large stage facilities (now known as Stages 7/8/9 and Stages 11/12/14) and several production service buildings.

During David O. Selznick's tenure at the site from 1935-1946, the site was almost completely built out, as seen in Figure 4: *Aerial Photograph, Selznick Studio.* Two significant bungalows (Building S & T) and one addition to Building D facing



Figure 4: Aerial Photograph, Selznick Studio Era. Photo courtesy of Bison Archives, 2005.

Washington Blvd. were constructed during this time; the last stage facility (Stages 15/16) was erected in 1940, which expanded the production capability of Stages 11/12/14. The development on the main studio site at this time most closely resembles its current configuration in site layout and scale. Exhibit A *Existing Site Plan* adequately illustrates this site layout.

To fully illustrate the growth of the studio during the period of significance, Exhibit H *Existing Site Plan, Coded by Studio Era* has the buildings and structures labeled according to studio era constructed.

Site Description

Comprised of a variety of buildings, some retaining a high degree of integrity in design and utilization, reflective of both the historic and contemporary uses on The Culver Studios lot. These structures are the defining features of the potential Culver Studios historic district. Each illustrates the types of activity required for a functioning studio lot: stages for film production; office buildings for administrative functions; dressing rooms for production support; support buildings for activities including set design, storage and power; and a commissary for service functions.

Offices and administrative uses are located predominantly at the front northern portion and the southwestern portion of the studio lot. Stages run the along the central spine of the studio lot from a mid-northern point to the back of the lot, in some locations forming the western boundary line. Support and service buildings line the front portion of the studio boundary along Ince Blvd, with some interspersed around the studio lot.

The studio lot consists of one major thoroughfare running north-south from the Administration Building area at the front of the lot back to Building Y, connecting smaller internal pathways on the lot. Circulation within the studio lot evolved as building placement and studio access changed.

Established by the innovative site design of Thomas H. Ince and the subsequent renovations, The Culver Studios' spatial relationship between the types of buildings and structures remains relatively unchanged: demolition and new construction, with few exceptions, has occurred in the same location with similar uses.

The front lawn remains the major landscape feature on the relatively flat Culver Studios site. Amongst the various modifications at the Culver Studios site, this notable aspect has been consistently maintained. Several small additions such as fencing, signage and pathways were added to the lawn area as stewardship of the site evolved. A significant attribute to the historic viewscape of the studio site from Washington Blvd., the lawn reinforces the historic character of the studio site by maintaining the relationship between the studio buildings and the surrounding neighborhood, a relationship instituted during the initial site planning phase.

Perimeter Boundary

The Culver Studios property line follows an irregular rectangular outline, defined by a combination of gates, walls, fences and buildings. Beginning at Gate #1 in the northwest point of the studio lot, the line moves northerly along Washington Blvd. and then northeasterly following Ince Blvd. The southeasterly property line and most of the property line on the southwestern side abut residential property, with exception the small portion on the southwestern side extending to Van Buren Place. A site map is provided in Exhibit A.

Four gates provide ingress and egress to the studio site – one on Washington Blvd. (Gate #1) and three on Ince Blvd. (Gates #2, 3 and 4). A low exposed brick wall and posts, enclosed with painted wood lattice rails, fence gates #1, 2 and 3; Gate #4 is a chain-link fence attached to a tall painted brick forming the boundary along Ince Blvd. Along Washington Blvd., a similar brick and wood fence bounds the front lawn, which represents the northerly property line of the studio lot.

Buildings D, E, J, L, O, Y and Stages 7/8/9 and 10 are situated at the property line, abutting the sidewalk on Ince Blvd., forming the perimeter boundary without fences or walls. A tall stucco wall outlines the remainder of the perimeter boundary at southeastern and southwestern edges of the studio lot, a majority of which abuts residential uses. Several parcels were annexed during the RKO ownership along the southwesterly edge which extend the studio perimeter to Van Buren Pl; this portion, which houses five bungalows and surface parking, is enclosed by a tall painted brick wall with two wood access doors.

Neighborhood Context

Culver City's built form is an amalgamation of different uses and architectural styles, and the studio site remains as one of the oldest sites and one of the most visually prominent in the city. In the year of the studio's inception, 1918, the neighborhood surrounding the

studio site witnessed a modicum of commercial and residential development. Sanborn Fire Insurance maps and aerial photography indicate the neighborhood surrounding the studio site became progressively denser with residential, commercial and institutional developments, commensurate with the population growth in Culver City over this time. Culver Studios' site boundary, including the buildings lining the exterior, were established within the period of significance over fifty years ago. Thus, the interrelationship between the studio site and the neighborhood evolved as the as the surrounding neighborhood was developed during the past century.

Buildings and Structures

Organization by Studio Era

The multiple changes in ownership invoked numerous modifications in site configuration, involving re-location of existing structures, new construction and demolition of offices and stages, and alterations of existing structures. Table 1 *Organization by Studio Era*, below, organizes the extant and demolished buildings and structures according to the era of studio ownership through the end of 1946, when Selznick International Pictures suspended operations and ended the lease on the RKO-Pathe'-owned studio lot.

Studio Era	Building/ Structure Name
Ince (1918-1925)	bunding of actar e Nume
Extant	Administration Building (Building C)
	Building D (original southern portion)
	Building E
	Building J (Mill)
	Building O (originally Stage No. 3)
	Building U (re-located?)
	Building V (re-located?)
	Stage 10 (re-located)
	Gate #2 (original Gate #1)
	Gate #3
	Gate #4
Demolished	
Demotished	Building F
	Stage 1 (glass stage)
	*Stage 2 (glass stage), later known as Stage 5 & Bldg P & re-located
	Pool (original capacity)
	Water tower
D-M:U- (1025 1028)	Paint shop
DeMille (1925-1928)	D-Mills Theodore
Extant	DeMille Theatre
	Building H (re-located)
	Building I (re-located)
	Building L
	Building N
	Building R
	Building W
	Stages 2/3/4 (originally built as Stage 2)
Demolished	Stage 4, later known as $Bldg Q$
RKO-Pathe' (1928-1935)	
Extant	Building X
	Building Y
	Building Z
	Stages 7/8/9
	Stages 11/12/14
Demolished	0
	Building G
	Building K
	Building M
	~

Table 1. Organization by Studio Era

Studio Era	Building/ Structure Name
Selznick (1935-1946)	
Extant	Building D (additional northern portion)
	Building S
	Building T
	Stages 15/16
Structures Built Since 1988	
	Building P
	Stages 5 & 6
	New Commissary
	Gate #1
	Elevator Shaft

Since the 1987 Survey conducted by Thirtieth Street Architects, Inc. (Survey) some reorganization at the studio site has occurred, including demolitions and building relocations. Table 1 *Organization by Studio Era* lists the extant and demolished buildings and structures according to the studio era of construction. Two site plans located at the end of this document accompany this discussion; they are titled Exhibit C *Changes Since 1987 Historic Survey* and Exhibit D *Building Demolition Since 1987*.

The Survey identified eight structures built during the Ince studio era. Of these six are extant; the two demolished include the original glass Stage 1 and Building F. Three entrance gates to the studio site date from this period, yet were not included in the Survey; the three gates are located along Ince Blvd. and are currently labeled Gates #2, #3, and #4.

Since the Survey no buildings or structures dating from the DeMille studio era have been demolished, but two have been re-located. Buildings H & I were moved from their original location on the site to accommodate new development in the late 1980s.

Nine buildings and structures built during 1928 until 1935 were surveyed in 1987. Approximately half of these (five out of nine) dating from this RKO-Pathe' studio era identified in the Survey remain in existence. Four buildings -- B, G, K, M -- have been demolished since the Survey.

No buildings or structures constructed during the Selznick studio era and identified in the Survey have been demolished since that time; four structures are extant on the site.

Other Structures

Two buildings dating from the period of significance were not evaluated in the Survey, yet remain integral components of the site history. Stage 10 was re-located to its current position adjacent to Building Y in 1940 during the Selznick studio era. Originally used as a "trick gallery", the use shifted at the same time of re-location to a Stage. Both of these

activities date to the period of significance and are consistent with the interchangeable nature of structures on studio sites. Building W, constructed during the DeMille studio era as dressing rooms, has retained a high degree of integrity in use, in location and in exterior appearance. These two structures have been evaluated for integrity and determined to be contributors to a potential historic district.

The three gates located along Ince Blvd. are part of the original studio development. Gates #2 and #4 do not retain original integrity. A new security booth was installed and a driveway was re-configured at current Gate #2, the main visitor entrance. Gate #4 does not retain the original gate fencing. What is currently Gate #3 was the original main entrance to the studio; the structure, defined by the (original) walls and the space of the gate opening, maintains its integrity.

Site Development Since 1987

New construction in the late 1980s involved some demolition of buildings and structures from the period of significance; the new ones are used for essential studio functions but are not historically significant. Exhibit D *Building Demolition Since* 1987 accompanies this section. GTG Entertainment (site owners at the time) completed an extensive renovation agenda in 1988-89, which included a new entrance gate for employees (Gate #1) leading to the site from Washington Blvd., a new underground parking structure situated south of the Administration Building, and other accessory construction on site. At this time, Stage 1 and Building P (original glass and muslin stages), the editing facility (Building F) and a warehouse (Building Q) were demolished to accommodate the new facilities. Also, the pool that had been filled in sometime during the 1960s was discovered during excavation for the underground parking; it was subsequently removed. These buildings and structures built during this time are non-contributors to a potential historic district: Gate #1; new Building P; Stages 5 & 6; and elevator shaft.

Categorization by Use and Property Type

The individual components of studio lots can be categorized into six general areas: stages; administrative; dressing rooms/ bungalows; process; support; service. In Table 2. *Studio Use by Property Type*, below, all extant structures as of 2005 are organized according to historic use by property type. The 1987 ranking is included, if applicable, and the individual contributor status to a potential historic district is identified.

Table 2. Studio	Use by Property Type
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Use by Property Type (historic)	Building/ Structure Name	Studio Era	1987 Ranking	Contributor Y/N
Stages	Stage 2/3/4	DeMille	A+	Y
	Stage 5 & 6	GTG (1988)	N/A	N
	Stage 7/8/9	RKO-Pathe'	A+	Y
	Stage 10	Ince (re-located)	**	Y
	Stage 11/12/14	RKO-Pathe'	A+	Y
	Stage 15/16	Selznick	A+	Y
Administrative ^a	Building C	Ince	A+	Y
	DeMille Theatre	DeMille	B+	Y
	Building D	Ince/ Selznick	A+	Y
	Building E	Ince	B+	Y
	Building H	DeMille (re- located)	B+	Y
	Building I	DeMille (re- located)	B+	Y
Dressing Rooms/ Bungalows	Building W	DeMille	**	Y
	Building R	DeMille	B+	Y
	Building S	Selznick	A+	Y
	Building T	Selznick	A+	Y
	Building U	Ince (re-located*)	A+	Y
	Building V	Ince (re-located*)	A+	Y
Process ^b	None remain			
Support ^c	Building J	Ince	B+	Y
	Building L	DeMille	A+	Y
	Building N	DeMille	C+	Y
	Building O	Ince	C+	N
	Building P	GTG (1988)	N/A	N
	Building X	RKO-Pathe'	C+	Y
	Building Y	RKO-Pathe'	C+	Y
	Building Z	RKO-Pathe'	C+	Y

Use by Property Type (historic)	Building/ Structure Name	Studio Era	1987 Ranking	Contributor Y/N
Service ^d	Commissary	GTG (1988)	N/A	Ν
Other	Gate #1	GTG (1988)	N/A	Ν
	Gate #2	Ince	**	Ν
	Gate #3	Ince	**	Y
	Gate #4	Ince	**	Ν
	Elevator Shaft	GTG (1988)	N/A	Ν

^a Administrative and office uses.

^b Editing and production uses.

^c Support uses include: costumes, mill, set design, power buildings, film vaults, scene docks, storage, water tower, pool.

^d Service uses include: commissary, hospital. ** Not included in the 1987 survey.

The Culver Studio site retains a majority of the historic studio uses that are successful in portraying the property's historic development and use. Of the thirty-two buildings and structures extant on site, twenty-four of these (75%) have been determined contributors to a potential historic district.

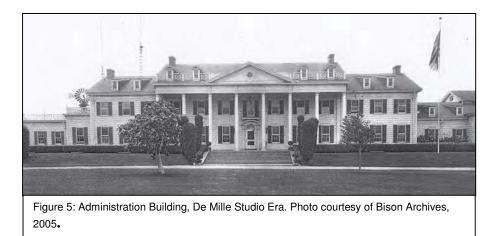
Narrative Building Description

The following building narratives provide a descriptive overview of the structures comprising The Culver Studio site. The first section includes structures existing on the site as of 2005. Demolished buildings are referenced in the second part of this narrative.¹

Existing Buildings and Structures²

Buildings.

Building C. Also known as the Administration Building, Building C was built in 1918 and remains the oldest structure on the lot. In 1927 the DeMille Theater was added to the east end of the building. The "Selznick wing" was added to the east end in 1936. This structure is a city of Culver City Historic Landmark. There have been numerous interior renovations over the years; the use of this building has remained substantially the same, as administrative offices, however evolved into executive offices when the editing spaces were removed during the Selznick era.



The Administration Building remains an outstanding example of 1920s colonial revival architecture, a good interpretation of Mt. Vernon architecture, and is the most visible and distinctive structure on the lot. The main section is two-stories high with a side-facing gable roof. Single-storied wings extend from each end and extend forward, forming an overall U-shaped building; the east wing was added during David O. Selznick's reign. The exterior is clad with wide shiplap siding,

¹ Several sources were utilized in assembling these descriptions. Architectural descriptions are excerpted from the 1987 survey conducted by Thirtieth Street Architects, Inc. More intensive research on the history of site ownership offered supplementary data on the history of individual structures. A site visit on November 22, 2005 supplied recent information on the site and structures, from observation and conversation with James Nale (Works Department Manager).

² See Exhibit A *Existing Site Plan* for building and structure location on the site.

trimmed with wide boards at the corners. The side-facing gabled roof is centered with a large pedimented front-facing gable and topped by four narrow gabled dormers. The dormers extend forward, almost to the roof edge, and are joined by a Chippendale-style balustrade. A multi-paned round window, with a keystone on each side, is centered in the gable, and the eaves of both the roof and the dormer are enclosed. Eight two-story high round pillars, accented with Doric capitals, support the recessed porch roof. The porch floor is made of red brick and has no balustrade. The 13-course Colonial-style front façade features 12 sets of 6-over-6 double-hung windows, flanked with green shutters. In between the number five and number six windows, a miniature double-hung window was installed by 1930, according to photographic evidence. The centered front door is topped with a Palladian window and segmented cornice, supported by a pair of Doric columns. Red brick chimneys extend from the roof at each end of the main gabled section. The wings on each side are different in design. The wing on the west end is topped with a side-facing gabled roof with gabled dormers which match the center section of the building. A large front-facing gabled wing extends forward. Enclosed eaves, with returns, and a Palladian-style vent accent the façade of the wing. Rows of identical 6-over-6 windows are flanked with green shutters. Red brick wainscoting adds visual weight to the bottom third of the wing. A Palladian window accents the 6-over-6 window on the bay at the corner of the ell. The east wing has a flat roof, bordered by a Chippendale-style wooden balustrade. Urns top each corner post. The fence across the front features red brick piers with crisscross latticework panels in the center. White wrought iron gates lead to the walk in the center and the driveway on each end. The rear of the building features a single-story porch which runs its length. Several small porch landings, with wooden stairs and rails, led to the rooms inside, however the doors have been removed and replaced with windows. This portion of the building once housed the artist section of the studio.

DeMille Theater. The DeMille Theatre appendage is attached to the east wing of the Administration Building.

The entrance to the Cecil B. DeMille Theatre, built by the famous producer in 1927, faces onto a brick courtyard on the east side of the administration building. Five square wooden posts, with chamfered edges and trimmed at the top with molding, support the full porch. A pair of paneled wooden doors lead to the small lobby. Round classical pilasters, supporting a segmented portico, flank the single wood paneled door to the theatre. A swagged Palladian window tops the door. Classical pilasters and ceiling molding trim the interior of the theatre, which is topped by an arched ceiling. The façade that faces the street matches the other Colonial Revival buildings across the front of the lot, and has 6-over-6 windows and red brick wainscoting. This theatre was dedicated to him on July 27, 1984.

Building D. This structure was built in 1924 during the Ince studio era, with a large addition made in 1936 to the north end during the Selznick era. This structure is a city of Culver City Historic Landmark.

Building D is composed of two phases, north and south, constructed in 1936 and 1924, respectively. The north section is a large single-storied multi-paned curved bay windows, accented along the bottom with vertical siding, accent the Colonial Revival-style wing on the northeast corner. Lapped siding, trimmed with wide corner boards, covers the exterior. The two-story section on the south is topped with a side-facing gabled roof, while the northern section features a gabled roof running at right angles to the taller structure. A large red brick chimney runs up the north side. 6-over-6 double-hung windows are used throughout the building. The south section of the building was moved from its original location on the lot. Horizontal lapped siding covers the exterior of the two-story Colonial Revival building to the east of the mansion. Rows of 6-over-6 double-hung windows are used singly and in pairs on both the first and second floors. The low-pitched gabled roof runs from the north to south. A pedimented gabled portico, supported by round Doric columns, shelters the paneled front door. The porch and stairs are of red brick. A plain railing borders the porch. Multi-paned sidelights flank the front door. The building is connected on both ends to other buildings.

Building E. Building E was built in 1922 during the Ince studio era.

Narrow shiplap siding covers the exterior of the Colonial-style cottage across from the DeMille Theatre. The side-facing gabled roof is centered with a front-facing portico with a gabled roof. Square wood posts with champfored edges and molding at the top support the portico. 6-over-6 windows, used both in pairs and singly, match the windows on the administration building. A gabled wing, with a recessed porch across the back, extends from the south side.

Building H. Built in 1925 during the DeMille studio era, building H was relocated from its original location in the front central area in 1988 to its new location southeast of the Administration Building. It was relocated to accommodate a new Gate #2 entrance configuration, vehicular pathways, and a new underground parking entrance ramp.

The Colonial-style detailing of the single-storied bungalow shown here is more pronounced than on the other small buildings. The side-facing gabled roof is of medium pitch. Lapped siding, which matches the administration building, covers the exterior and is trimmed in corner boards. Pairs of 6-over-6 double-hung windows, edged with plain trim and narrow molding, are used throughout the building. Round Doric pillars support the pedimented gabled portico, and a plain railing runs along each side. The wood-paneled door is topped with a fine swagged Palladian transom. A smaller gabled portico is located on the west side. **Building I.** Building I was built in 1925 in the front central area of the lot. In 1988 the building was re-located to its current position southwest of the Administration Building, to accommodate a new Gate #2 entrance configuration, vehicular pathways, and a new underground parking entrance ramp.

This is a single-storied lapped-sided structure is topped with a low-pitched sidefacing gabled roof. Single and double 6-over-6 double-hung windows, surrounded by wide trim, occupy all facades. A shed-style porch, supported by round Doric columns, is placed slightly off center. The plain railing runs across the front of the porch, with the steps on the south side.

Building J. Built in 1920 during the Ince studio era, Building J has remained in continuous use as the Mill (or carpenter's) shop since the beginning of The Culver Studios. There have been alterations to the Mill shop over the years. Several alterations to the Mill have been made both within the period of significance and after this period: the replacement (in kind) of the exterior wall, the enclosure of the dormer roof, the enclosure of the dust suction tower; various interior partition change; and an addition to the southern end was made in 1940.

Board-and-batten siding covers the exterior of the two-storied gable-roofed "electric shop building", located on the eastern boundary of the studio lot. The front-facing gabled roof is topped by a narrow projecting gablet, which runs the length of the building. Three large two-story high wooden freight doors, trimmed with narrow boards, are located along the west side. The north side features a row of small aluminum windows. An addition on the south end is clad in plywood, trimmed in batts, and has a flat roof. It features one of the two-story high wooden windows. An addition on the south end is clad in plywood, trimmed in batts, and has a flat roof. It features one of the two-story high wooden doors and rows of aluminum windows. A shed-style porch shelters the windows along the first floor at the south end.

Building L. Building L was built in 1926 during the DeMille studio era. In 1998 there were significant alterations to the structure; exterior changes were made in keeping with the original stucco, box-like appearance.

Originally used as the nitrate film-processing lab, this two-story brick building served as the original Commissary until 1988, and remains in use as a part of the Bistro restaurant. Two stories high, with a flat roof and unbroken parapet, the structure is reinforced with visible concrete beams. Sets of large, recessed, multipaned metal-framed windows occupy the second floor of the front (west) façade. New large recessed metal-framed windows are interspersed with recessed aluminum-framed doors, topped with transoms.

Commissary. This new Commissary was built in 1988. During renovations in the late 1980s, the original Commissary was torn down and replaced by the current Commissary in the same location.

Building N. Built in 1925 during the DeMille studio era, it was originally used as a power building and retains the same use.

This structure is one of several pre-1937 buildings still surviving on the premises. Single-storied, with gables at each end, the power house is constructed of brick. Two large multi-paned windows on the east side reach from the ground to the roof and have metal frames. A freight door is located on the south end and smaller metal-framed windows are located on the west side. The power lines and insulators are located on the west side.

Building O. Built in 1919 during the original Ince studio era as the original Stage No. 3, Building O is currently a general storage space. According to the Sanborn maps, this building was initially Stage No. 3, transformed into a storage and scene dock space during DeMille's studio ownership. Building O has undergone substantial alterations, first in 1988 and again in 1998.

This three-storied building is clad in stucco. The low-pitched front-facing gabled roof is accented with a plain freize and molding. The row of windows along the third floor has been removed and stuccoed over. The double-hung windows on the second floor have been replaced with aluminum double-hung windows, but the original wide board trim, bordered with narrow molding, is still intact. Two sets of exterior stairs lead to the second floor. A narrow beltcourse separates the first and second floors. A variety of wood-trimmed windows and doors are used along the first floor west façade. A pair of large wooden freight doors open into the building from the west side. The east side is blank and faces Ince Blvd.

Building P. The new Building P was constructed in 1988. At this time, the original Building P and Old Stage 5 (originally glass Stage 2, re-located) were demolished. In the same part of the lot, a new Building P was erected alongside new Stages 5 and 6.

Building R. Built in 1925 during the DeMille studio era, this structure is located adjacent to the bungalow cluster on the southwestern extended side of the lot.

Although this building still retains much of its original character, it must be noted that it has been covered with aluminum siding and windows. The siding is lapped, with corner boards. The low-pitched side-facing gabled roof features hipped peaks at each end. Gabled porticos shelter two of the four entrances on the west side. Square posts and a plain railing, with closely-spaced balusters, are featured on the porch. Other porches are similar, with small shed-style roofs. Aluminum windows, edged in green plastic replace the original. This bungalow's plain appearance and major alterations are offset by the fact that Alfred Hitchcock used it for his office/ study for several years. Note: this is not included as a "significant" bungalow.

Building S. Built in 1935 during the Selznick studio era as a residential bungalow for stars Clark Gable and Vivien Leigh during the filming of "Gone with the Wind", this bungalow has been previously designated by the city of Culver City as a locally significant structure. This is one of four bungalows of significance on the site; these bungalows are situated on the southwestern extended side of the lot.

Following the Colonial Revival theme set by most of the buildings on this studio lot, Building S has wide lapped siding, 6-over-6 double-hung windows and shutters. The hipped roof is centered with pedimented front-facing gabled porticos on both the north and east sides. The porticos are supported by round Doric columns and bordered with plain balustrades. The wood-paneled doors are topped with three-paneled transoms. A small yard and white picket fence surrounds the bungalow.



Building T. Bungalow T was built in 1938 as a residential bungalow, and designated a locally significant structure by the City of Culver City due its association with the actress Olivia deHavilland. This is one of four bungalows in existence on the site; these bungalows are situated on the southwestern extended side of the lot.

A slight variation of the Colonial Revival theme is seen in the bungalow called Building T. Like Building S, it was constructed several years after the Administration Building. Wide lapped board, trimmed with corner boards, covers the exterior. The side-facing gabled roof features enclosed eaves and returns. Small pedimented, gabled porticos extend from the east and south sides. Square posts support the porticos and trellises accent the spaces on the sides of the porch. A pair of matching doors is centered in the north end, while a single woodpaneled door is located under the portico on the east side. Small 9-light windows, with plain trim are used on all sides. A small yard surrounds the bungalow. This bungalow retains almost all of its original integrity.

Building U. Building U is a residential bungalow, constructed in and designated locally significant by the city of Culver City due to its association with Orson Welles during filming of "Citizen Kane". This is one of four bungalows in

existence on the site; these bungalows are situated on the southwestern extended side of the lot.

A flat roof, with unbroken parapet, caps the single story stucco-clad Moderne building. Small double-hung windows, edged with narrow molding and installed flush with the exterior, are used on all facades. A plain door, sheltered by a horizontal Moderne-style flat canopy, is centered in the front façade. Pipes, leading from the outside corners of the canopy to the face of the building, support the canopy. A wooden water heater addition on the front is an obvious alteration. Rows of double-hung windows are used on all facades.

Building V. Bungalow V was built in 1924 and designated locally significant by the city of Culver City due to its association with actress Gloria Swanson. This is one of four bungalows in existence on the site; these bungalows are situated on the southwestern extended side of the lot.



A narrow border edges the top of the unbroken parapet of this stucco-clad building. The front is single-story, but there is a flat-roof second-story room at the back. A flat-roofed

Figure 7: Aerial View, Bungalow V, 1930. Photo courtesy of Bison Archives, 2005.

porch, supported by square wooden posts, occupies the southeast corner. Doublehung windows are used throughout the building. Those on the bay on the south side have Oriental-style muntins. Narrow horizontal banding accents the face above the windows and at wainscot height. A small yard and picket fence surround the building.

Building W. These dressing rooms (now editing bays) were constructed during the DeMille studio era at the same time Stages 2/3/4 were constructed; this structure was intended as a support structure for the stages. This building has not changed location. Building W is located directly behind (south) Stages 2/3/4, and according to photographic evidence, have been in this same location since its construction. Note: There is no individual survey sheet for Building W from the 1987 survey, nor was this denoted on the Gensler site plan.

Following the Colonial Revival theme, the narrow rectangular shaped building is clad in wide lapped board, trimmed with corner boards. The low-pitched side gabled roof, with overhanging eaves and exposed rafters, fully encloses the building and full-length porch. Each editing (office) bay is entered through a separate door accessed from the porch. Square wooden posts support the raised, full-length porch; there are three sets of wooden steps to access the porch. Double-hung windows are used throughout. A pair of double-hung windows flanked on each side by one door is the pattern along the façade. This pattern is interrupted in the façade center, where one window is flanked by one door on each side. **Building X.** Built in 1930 during the RKO-Pathe' studio era, Building X is one of the original concrete vaults on site. It is currently situated north of Stages 7/8/9, near Gate #3. These old film vaults are currently used for storage.

Long and narrow, with its back on Ince Blvd., the film vaults are constructed of brick, topped with a very low-pitched hipped roof. Six single-paneled doors, edged in egg-and-dart molding, are spaced along the west façade.

Building Y. Building Y was constructed in 1930 during the RKO-Pathe' studio era. This structure was initially used as a plaster shop; this building is currently used for various carpenter activities.

A flat roof and stucco cladding cover the exterior of the two-story high scene dock. Three sets of metal-clad doors are located on the north side. Two small aluminum windows, a door, and a transom indicate the location of the office.

Building Z. Built in 1930 during the RKO-Pathe' studio era, Building Z has remained in continual use as a scene dock at the back of the lot.

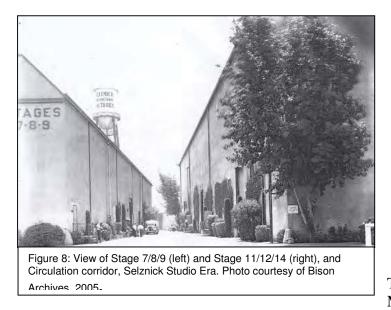
Corrugated metal covers the two-story portion of the scene dock at the back of the lot. Board-and-batten covers the southern-most single-story section. Two tall, narrow multi-paned windows are located on the second floor and metal-clad freight doors are used on the first floor. A row of wood-framed windows forms a transom above the shed-style porch roof. New aluminum windows and French doors are in place at the first floor level.

Stages 2/3/4. Built in 1926 during the DeMille studio era, Stages 2/3/4 were first known as Stage 2. The original intended use as stage production space with second-level offices continues today. This stage facility is different from the original glass Stage 2.

Wood panels cover the exterior of the three-story high stages located in the center of the lot. The roof is flat. A row of multi-paned metal windows and a recessed porch, supported by wood posts, run along the third floor. Wooden stairs lead to the second floor at the south end and metal stairs lead to the north end of the third floor porch. Recessed 4-over-4 windows occupy the first and second floor at the north end. The large wooden doors are left open most of the time and ramps allow vehicles to drive into the lobby.

Stages 5 and 6. Stages 5 and 6 were constructed in 1988. At this time, the original Building Q (previously Stage 4) and Building P (previously glass Stage 2, re-located, then old Stage 5) were demolished. These two new stages were built in a different orientation on the same place on the lot.

Stages 7/8/9. Built in 1928 during the RKO studio era, Stages 7/8/9 have been continually used as stages.



Stucco covers the exterior of this threestory high rectangular building. low-А pitched Dutch Colonial-style roof forms wide gables at the front and back. There are no windows in the building. Large wooden freight doors, clad sometimes in diagonal car siding, lead to the interior. Three flat metal Moderne-style canopies,

interspersed along the west side, shelter the walk-in doors.

Stage 10. Possibly built during the first phase of Ince's studio construction, it is assumed that Stage 10 was constructed before 1920. It was originally a special effects ("trick gallery") building, and is currently used as a stage area. This stage was probably re-located from its original location at the southeast mid-part of the lot to northeast back of the lot, adjacent to buildings Y and Z. Photographic and written evidence suggest that Stage 10 was re-located in 1940 to make way for the construction of Stages 15/16. Note: There is no individual survey form from the 1987 survey.

Stage 10 is unique among the remaining expansive, utilitarian, stucco-clad stage structures. Pulling from the Southern Colonial theme found on the lot, Stage 10 is clad in wide lapped board, trimmed with corner boards. A side-gabled roof with slightly overhanging eaves and exposed rafter tails caps this two-story high stage area. The walls exhibit arbitrary fenestration patterns. On the side walls, three pairs of 2-over-2 double hung windows are set directly below the roofline; a single 6-over-6 double hung window and two door entrances are situated at the first level. Elephant service doors are located at the entrances; they are flanked by double hung windows at the second-level. After being re-located to its current position, a small covered addition was made to the southern portion of the stage.

Stages 11/12/14. Stages 11/12/14 were constructed in 1930 during the RKO-Pathe' studio era. One of the most obvious exterior alterations was the addition of a large silent air system at the northern side of these stages during "Mad About You" filming.

This large stucco-clad building has no decoration and is topped with a lowpitched gabled roof with narrow overhangs. Three metal-clad freight doors lead to the interior from the east side. Two metal-striped canopies shelter the two walk-in doors. A single-story shed-style addition runs along the west side. See Figure 7: *View of Stage 7/8/9 (left) and Stage 11/12/14 (right), and Circulation corridor* for an image of this structure.

Stages 15/16. Built in 1940 during the Selznick studio era, Stages 15/16 were built as additions to Stages 11/12/14.

They are two stories high and clad in stucco. Large one and one-half high freight doors lead to the sound stages. A single-story style lean-to has been added to the side.

Structures

Gate 1. Built in 1988-89 this new entrance gate provides access to the studio site off of Washington Blvd.

Gate 2. This Gate was established during the Ince studio era and re-configured in 1988 to be used as the main visitor entrance from Ince Blvd. The new security booth is a good example of Mount Vernon architectural infill.

Gate 3. Built during the Ince studio era as the original main entrance from Ince Blvd. into the studio site, this entrance is used intermittently.

Gate 4. This entrance was built during the Ince studio era leading to the studio site from Ince Blvd., however is used for emergency situations now.

Elevator shaft. This elevator shaft was erected in 1988 to access the newly constructed underground parking structure. Located behind the Administration Building, it is a good example of Mount Vernon architectural infill.

Demolished Buildings and Structures (as of 2005)³

The structures listed below were erected on site at some point within the defined period of significance, but have since been demolished. They are no longer part of the existing fabric. These structures are documented as important components of development on this site. These demolitions provide reference to the evolving nature of the site as it developed for studio use.

Buildings

Building A. Built in 1922 as offices, Building A was demolished in 1988 for a new Gate #1 entrance configuration and vehicular pathway.

Building B. Built 1940 during the RKO-Pathe' studio era, Building B was demolished in 1988 to make way for a new Gate #1 entrance configuration and vehicular pathway.

Building F. Built in 1920 during the Ince studio era as the Production Building, Building F housed a variety of production activities. It remained in the same location, directly behind the Administration Building, until its demolition. It was demolished in 1988 to accommodate the new Gate #2 entrance configuration, paved surface parking with ramp leading to underground parking and elevator shaft leading to the underground parking.

Building G. Building G was constructed in 1930 during the RKO-Pathe' studio era. Originally used as a scene dock servicing the original Stage 1, it was probably demolished along with Stage 1 in 1988.

Building K. Building K was constructed in 1930 during the RKO-Pathe' studio era. This building was probably demolished in the late 1980s during the large-scale site renovations.

Building M. Built in 1930 during the RKO-Pathe' studio era, Building M was adjacent to the original Commissary. This building was demolished in 1988.

Building Q. Building Q was constructed during the early years of the DeMille studio era as Stage 4, but as the studio site needs changed its use evolved into a warehouse. Before demolition in 1988 this structure was situated parallel to the original Building P.

Original Commissary. The original Commissary was built during the Selznick studio era in a style maintaining the southern Colonial revival theme of the

³ Some of these demolitions are noted on Exhibit D *Building Demolition Since 1987*.

Administration building and others. It was demolished in 1988 for construction of a new Commissary in the same location.

Paint Shop. The original Paint Shop built during Ince's studio development era was probably demolished during the studio era of RKO. The paint shop was adjacent to/ attached to Building O. It was demolished before 1950, according to Sanborn maps.

Stage 1. The original glass Stage 1 was constructed during the Ince studio era in 1919. The structure was re-oriented in 1925 during the DeMille studio era. Initially used as a stage, it evolved into a property stage. This Stage was demolished in 1988.

(Original) Stage 2/ (original) Building P. Built in 1919, Stage 2 became known as Original Stage 5, situated adjacent to original Building Q. Initially used as a stage, this structure evolved into a scene dock and wardrobe and property stage known as Building P. In 1926 during the DeMille studio era, this structure was relocated on the site. It was demolished in 1988 for construction of new Stages 5 and 6 and new Building P.

Structures

Water Tower. Probably built during the first phase of the Ince studio era, according to aerial photographs. The water tower was always located at the northeastern a side of the site near Gate #4, and was demolished in 1991.

Summary of Prior Evaluations

1987 Historic Survey

In November 1987 Thirtieth Street Architects, Inc. completed survey fieldwork to prepare an Historic Resources Report for the City of Culver City, under contract with the Culver City Redevelopment Agency. It is important to note that in 1987, structures built before 1937 met the fifty-year old threshold. Some structures extant on the site may have been assigned a non-significant ranking due to age, however all surveyed structures were considered contributors to a potential studio district.

The Historic Resources Report has three parts. The first part, Phase 1.0, includes those structures previously identified from the City's seismic survey. Phase 2.0 includes a final overview of the 1987 survey methodology and identification of any new historically, culturally or architecturally significant structures in the City. The final part of the Report consists of the individual survey forms with historical description and rating of eligibility. This Report does identify numerous residential and commercial structures, specified as possible individual structures or contributors to a district, however, for the purposes of this summary only the *Culver Studio District* will be discussed.

A brief history of The Culver Studios is included in the Report. It outlines the numerous ownership changes; references notable film and television productions at the site over the decades; and creates a contextual foundation of the overall significance of the Culver Studios site. All individual structures on site were evaluated and ranked according to an A, B, C, D rating system. The forms contain research such as year of construction, architectural style, association with persons of importance, and permitted (or observed) alterations. This alphabetical system was developed to categorize structures according to eligibility for listing at various levels (National and local; individually or part of a district) or lack thereof.

"A"- ranked structures include those considered potential candidates for listing in the National Register of Historic Places. As a result of the historic survey, the Administration Building and Building D were deemed eligible for "landmark" status. Four other bungalow structures were designated locally "significant" structures (bungalows S, T, U and V). "B"- ranked structures include those not individually potentially eligible for listing in the National Register yet maintain local individual significance. "C"- ranked structures include those maintaining the original style, not individually distinctive, and may be possible contributors to a district. "D"- ranked structures include those pre-1940 which have undergone alterations so that they are no longer legible (but may be restorable). For those structures determined to be contributors to a potential historic district, a "+" was added to the letter rating; all of the structures *Organized by Previous Evaluation* displays the buildings and structures organized by the 1987 ranking.

Eligibility 1987 Survey	Structure Name	Studio Era
Category A+	Building C	Ince
	Building D	Ince/Selznick
	Building L	DeMille
	Building S	Selznick
	Building T	Selznick
	Building U	Ince (re-located)
	Building V	Ince (re-located)
	Original Stage 1	Ince
	Stages 2/3/4	DeMille
	Stages 7/8/9	RKO-Pathe'
	Stages 11/12/14	RKO-Pathe'
	Stages 15/16	Selznick
Category B+	DeMille Theatre	DeMille
	Building E	Ince
	Building F	Ince
	Building H	DeMille (re-located)
	Building I	DeMille (re-located)
	Building J	Ince
	Building F	Ince
	Building M	RKO-Pathe'
	Building R	DeMille
Category C+	Building B	RKO-Pathe'
	Building G	RKO-Pathe'
	Building K	RKO-Pathe'
	Building N	DeMille
	Building O	Ince
	Building X	RKO-Pathe'
	Building Y	RKO-Pathe'
	Building Z	RKO-Pathe'

Table 3. Buildings and Structures Organized by Previous Evaluation

Note: There are thirteen structures listed in Category A, a ranking that indicates the individual structures potentially eligible for listing in the National Register. Of these one structure (Original Stage 1) has been demolished; the remaining twelve retain a high degree of integrity.

1990 Historic Preservation Advisory Committee Report – Recommendations for Historic Preservation Program

Following the 1987 intensive survey, an Historic Preservation Advisory Committee (HPAC) was formed at the end of 1989 through the direction of City Council and City Staff. The HPAC was charged with developing recommendations for an Historic Preservation Program for the city of Culver City. Utilizing the database of architecturally/ historically/ culturally significant properties from the 1987 survey and examining the City's policies impacting such resources (or lack thereof), the HPAC developed a strategy for the City. The HPAC Report (Report) provides recommendations for the development and the implementation of an historic preservation program in a five-part approach.

The first three parts of the Report discuss the categorization of properties and a procedural structure for designation. Part I describes the "Criteria for Significance", including the categories under which the resource can be listed (i.e. architectural, historic, cultural) and the point system for determining the resource's significance level (i.e. "Landmark", "significant", or "recognized"). Establishment of an "Historic Preservation Program" is recommended in Part II. The Program would function as a three-tiered system according to the above-mentioned rankings, and some specific regulations, such as permit review and waiting periods and required minimum maintenance standards, were recommended. Part III outlines a specific designation process for identified structures and a continuing designation process for the future.

Part IV of the Report defined a Financial Assistance Program, to provide financing for preservation assistance. In order for a property owner to obtain financial assistance, the site or structure must meet two requirements. The first requires the site or structure to meet one or more of the threshold components: situated within Redevelopment Agency area; or, low- to moderate-income residential unit; or, publicly owned. Second, the site or structure must meet the criteria of significance: listed as a "landmark" or "significant" property; in need of seismic upgrades; extant code deficiencies; requires rehabilitation of architectural significant features.

The last section of the Report's recommendations, Part V, issued the preliminary identification of residential and commercial properties, and individual and district listings within each use type. The *Culver Studio District* is one of two studio districts identified in Culver City, the other named the *Columbia Studio District*, each with individually designated "landmark" and "significant" structures on the site. These designated buildings are shown in Exhibit B *Historic Building Designation*.

Evaluation of Significance

Historical Designations

A property may be designated as historic by National, State, and Local authorities. In order for a building or grouping of buildings (district) to qualify for listing in the National Register or California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

The criteria for eligibility for listing in the California Register are based upon National Register Criteria. Current CEQA guidelines require cultural resources reviews to consider eligibility for the California Register of Historical Resources. Historic sites no longer have to be eligible for the National Register of Historic Places to be considered as "historical resources" under CEQA.

The individual buildings and structures on site were evaluated in 1987 as contributors to a potential historic district. Although no district designation has been sought, several individual buildings and structures have been designated as landmarks or significant at the local level.

National Register Criteria for Evaluation

The National Register of Historic Places is an authoritative guide used by Federal, State and local governments, private groups and citizens to identify historic and cultural resources. The National Park Service has established criteria for the evaluation of properties proposed for inclusion in the National Register of Historic Places. These criteria are the Register's standards for determining the significance of properties. The categories are related to the four National Register Criteria for Significance, which are described in the National Park Service's *National Register Bulletin 15* as follows:

Criterion A: Associated with events that have made a significant contribution to the broad patterns of our history.

Criterion B: Associated with the lives of persons significant in our past.

Criterion C: Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history [pertains to archaeological sites].

Eligibility as a District – National Register

According to the National Register guidelines, properties with large acreage or a number of resources are usually considered a district. A district must possess a significant concentration, linkage, or continuity of sites, buildings, structures or objects united historically or aesthetically by plan of physical development. It derives its importance from being a unified entity.

The preliminary research documented in preceding sections has evaluated The Culver Studios site with twenty-four historic structures as contributors to a (potential) historic district. The site qualifies as an historic district at the National level, and subsequently state and local levels. While studio facilities are often altered as production needs change and technology evolves, a high proportion of structures on site remain in the location established during the period of significance or have been minimally altered. Therefore the site maintains high integrity and provides a sense of the scale and nature of historic studio facilities due to the high proportion of extant contributing resources. The contributing historic resources continue to dominate the studio site, defining the site's status and purpose. Therefore, the district appears eligible under Criterion A as a cohesive representation of early motion picture studios at the local level.

Resources were reviewed as to whether they were contributing or non-contributing to the potential historic district. After conducting research and fieldwork, incorporating the previous survey, Historic Resources Group has evaluated the following resources within The Culver Studios site as contributors to its significance.

The twenty-four contributors to a potential Culver Studios historic district include:

- Building C (building)
- DeMille Theatre*
- Building D (building)
- Building E (building)
- Building H (building)
- Building I (building)
- Building J (building)
- Building L (building)
- Building N (building)
- Building R (building)
- Building S (building)
- Building T (building)
- Building U (building)
- Building V (building)
- Building W (building)
- Building X (building)

- Building Y (building)
- Building Z (building)
- Stage 2/3/4 (building)
- Stage 7/8/9 (building)
- Stage 10 (building)
- Stage 11/12/14 (building)
- Stage 15/16 (building)
- Gate #3 (structure)

*Please note that the DeMille Theatre is attached to (and part of) Building C, the Administration Building.

The built environment consisting of the contributing resources is significant for the development pattern it reflects and also because it is comprised of buildings used to perform each task necessary to produce a film, from housing actors during filming to storing props and viewing scenes for editing (with the exception of process facilities). The contributing structures provide a strong physical link to the creation and development of all aspects of filmmaking as practiced by the multiple owners of the facility. Their unified aesthetic, first defined by Thomas H. Ince's development of the site and later by Cecil B. de Mille, RKO-Pathe' and David O. Selznick, further defines the resources that contribute to the district.

Period of Significance

Period of significance is determined by analyzing the history of the site and associated themes as identified in National Register guidelines. The theme that most applies to The Culver Studios site is social history, including its relation to the broad patterns of local history and the history of filmmaking. Social history is defined as "the history of society and the life-ways of its social groups" to the extent that the property represented a way of life that was typical of other sites involved in early filmmaking in the Los Angeles area.

The Culver Studio site grew to its current configuration over four phases, spanning four studio eras between 1918 and 1946, which incorporates the studio ownership periods of Thomas H. Ince, Cecil B. DeMille, and RKO-Pathe' and the full studio lease period by David O. Selznick from RKO-Pathe'. When Thomas H. Ince acquired the property in 1918 the site was centered at the northern section of lot on Washington Blvd. As subsequent owners acquired the property, additions were made to meet production needs and to incorporate new technologies; this development extended the site in a southerly direction along Ince Blvd. The Culver Studios site is composed of twenty-eight buildings and structures and four entrance gates. A large proportion of these, approximately 81%, were constructed within the period of significance.

Integrity

Integrity is defined as "the ability of a property to convey its significance." The National Register has seven criteria on which the integrity of an historic property is based: **location, setting, design, materials, workmanship, feeling and association**.

Thomas H. Ince chose the original **location** for present-day Culver Studios, in Culver City, site for its proximity to a natural waterway for filming purposes and for the availability of acquisition from landowner Harry Culver. Ince's original site included the twenty-acre studio filming and production site and a forty-acre back lot. During the period of significance, the main production site was enlarged by the acquisition of several parcels at the west edge of the original rectangular lot to form its current boundary. The back lot was sold off in 1968; although filming, processing – did, and still do, occur on the subject property (the main studio site), representative of the activities associated with motion picture production. No other boundary alterations have been documented. The district retains the integrity of location.

The Culver Studios' **setting** includes two areas: the city within which the site is located and the motion picture industry within which it operates. In 1918 the property surrounding the studio site witnessed a modicum of commercial and residential development that grew denser over the decades, paralleling the growth in population in Culver City. The relationship established at the onset between the surrounding neighborhood and the studio site has remained the same. As the second large motion picture studio to be located in the city, Culver Studios contributed to the expansion of this industry at a local level, as well as the regional level within the Los Angeles area entertainment industry. The integrity of setting remains strong.

The Culver Studios site **design** is relatively cohesive, and one of the better remaining, representations of the development of motion picture studios in the Los Angeles area. Its current site configuration was established within the period of significance (1918-1945) and retains a high number of buildings and structures dating from the period of significance. The spatial relationship between the types of buildings and structures remains relatively unchanged: demolition and new construction, with few exceptions, has occurred in the same location with similar uses. The Colonial Revival architectural theme applied to the first building on the site and to other administrative, process and support buildings have been well maintained. Massive stage buildings, which occupy a large portion of the site, exhibit the utilitarian-style design and construction typical to this type of building. Both of these styles were established at the studio site during the period of significance and have been actively preserved since that time. The site retains a high degree of integrity of design.

The site functions today, as it did at its inception in 1918, as a studio site with filming and production capabilities. The **feeling** of an early twentieth century motion picture studio is sufficiently expressed by the current Culver Studios site; its has remained in continuous

use as a studio facility and the design of the main studio site has been relatively unchanged since the period of significance. The integrity of feeling remains strong.

Architectural **workmanship** on the site is reflected in the interpretation of the Colonial Revival theme, initiated in the Administration Building and reproduced in other supporting structures on the lot. The alterations on these buildings have preserved the architectural style. The integrity of workmanship remains strong.

Its **association** with the enlargement of the motion picture industry in Culver City and the Los Angeles area remains strong. The City gained a presence as a formidable production district within the larger Southern California entertainment industry after the construction of the first studio (now Sony) in the early 1910s -- a presence that was further solidified in 1918 by present-day The Culver Studios. The integrity of association is strong.

Summary

With seventy-five percent of the extant resources contributing to a potential historic district and a current site configuration that resembles the site layout from 1946 with little exception, the historic, and continued use, of film production are both adequately portrayed by The Culver Studios site. This studio retains its connection to the development of the motion picture industry in the Los Angeles area and is an exemplary development within this context. The Culver Studios retains eligibility, first determined in 1987, as an historic district, under Criterion A due to its associative value within the context of motion picture studios at the local level.

Under the California Environmental Quality Act (CEQA), adopted in 1970 and most recently revised in 1998, the potential impacts of a project on historical resources must be considered. The next part of this report provides a determination of potential impacts on the site by the proposed project, including an overview of the proposed project and the preliminary evaluation of impacts upon historic resources of The Culver Studios.

DETERMINATION OF IMPACTS

In determining potential impacts, a "substantial adverse change" means "demolition, destruction, relocation, or alteration of the resource such that the significance of an historical resource would be materially impaired".⁴ The setting of a resource should also be taken into account in that it too may contribute to the significance of the resource, as impairment of the setting could affect the significance of a resource. Material impairment occurs when a project:

- 1. "Demolishes of materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- 2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is no historically or culturally significant; or
- 3. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.⁵

CEQA regulations identify the Secretary of Interior's Standards as the measure to be used in determinations of whether or not a project of new development or rehabilitation adversely impacts an "historical resource." Section 15064.5(b)(3) states:

Generally, a project that follows the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimer, shall be considered as mitigated to a level of less than significant impact on the historical resource.

Proposed Project

Culver Studios has developed a proposed Master Plan for the Culver Studios property and the adjacent "Parcel B", the triangular site north of The Culver Studios lawn across Washington Boulevard. Preliminary information on this project has been extrapolated from the conceptual site design drawings, e-mails, and telephone conversations from the project architects. One of the main objectives of the Master Plan is to increase office square footage at the production site. This will involve demolition and new construction

⁴ See California Public Resources Code 5020.1(q)

⁵ State CEQA Guidelines, 15064.5(b)(2).

on the subject property. Another related objective is to increase parking on site, to be provisioned through surface and structured parking.

The proposed project involves the demolition of Building J and the construction of a new four-story Building J comprised of 49,500 s.f. office space. A new 200-space parking structure may have impacts on Buildings S, T, U and V. Additional demolition, site planning and design of new construction will be factors in determining the impacts of the plan.

California Environmental Quality Act

Under the California Environmental Quality Act (CEQA), adopted in 1970 and most recently revised in 1998, the potential impacts of a project on historical resources must be considered. The purpose of CEQA is to evaluate whether a proposed project may have an adverse effect on the environment and, if so, if that effect can be reduced or eliminated by pursuing an alternative course of action or through mitigation measures.

The impacts of a project on an historical resource may be considered an environmental impact. Section 21084.1 of the California Public Resources Code states:

A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources.

Thus, under CEQA, an evaluation of project impacts requires a two-part inquiry: a determination of whether or not the resource is historically significant and a determination of whether the project will result in a "substantial adverse change" in the significance of the resource.

A building is considered historically significant, and therefore an "historical resource" under CEQA, if it falls into one of three categories defined by Section 21084.1 of the Public Resources Code. Mandatory historical resources are sites listed in or eligible for listing in the California Register of Historical Resources. Presumptive historical resources include site officially designated on a local register or sites found by the State Historic Preservation Officer (SHPO) under Section 5024.1(j) of the Public Resources Code. Discretionary historical resources are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register (see California Public Resources Code 5024.1(c)). Properties designated by local municipalities can also be considered historical resources. It is considered an historic resource under CEQA.

A review of properties that are potentially affected by a project for eligibility is also required under CEQA.

Preliminary Evaluation of Impacts

Historic Significance

CEQA requires an assessment of a property's historic significance before analyzing the environmental impacts associated with a proposed project. In 1987 consultants determined The Culver Studios site a potential historic district. Based on research conducted by HRG in 2005, the site retains historic district eligibility, under Criterion A due to its associative value within the context of motion picture studios at the local level⁶; several locally-listed monuments of cultural and historic significance are located on the site. Therefore the proposed redevelopment Master Plan for The Culver Studios must address any substantial adverse changes to cultural resources on the site, which is discussed in the next section.

Substantial Adverse Change

According to the project there will be two geographic areas of impact within The Culver Studios boundaries: one along the property line wall on Ince Blvd. and the other located at the western, or "residential area", of the lot.

In the first area, Building J is slated for demolition. Demolition of a contributing resource (Building J) may have a significant adverse impact and should be analyzed for its role in its overall contribution to the district. The proposed project states that a new building will be constructed on the original Building J footprint. Under the assumption that a new building will occupy the same spatial area, no major circulation patterns will be substantially altered. The loss of a contributor may be an unmitigatable impact; however, its demolition alone will not threaten the district's eligibility.

Currently six buildings are located on the southern portion of the residential area; new construction proposed for this location would represent the second area of impact. A parking structure is proposed for this location. Resources in this area include Buildings R, S, T, U, and V. Re-location or demolition of these buildings could constitute an impact. This impact can be mitigated to a less than significant impact, if relocation and other issues of the Master Plan are designed in accordance with the Secretary of Interior's Standards.

This report is a preliminary assessment of impacts to identified cultural resources, and is not intended to be a full evaluation of impacts on cultural resources under CEQA.

⁶ The historic significance of The Culver Studios is fully documented in the Existing Conditions part at the beginning of this report.

List of Exhibits

- A. Existing Site Plan (Gensler)
- B. Historic Building Designation (Gensler)
- C. Changes Since 1987 Survey (Gensler)
- D. Building Demolitions Since 1987 (Gensler)
- E. Sanborn Map, 1924
- F. Sanborn Map, 1929
- G. Sanborn Map, 1929-1950
- H. Existing Site Plan, Coded by Studio Era

The Culver Studios: Comprehensive Plan Amendment #6 by Gensler Architecture & Planning, April 16, 2010, revised October 2010 (includes landscape design plans)



Revised October 2010





Prepared for:

APN #'s: 4206-022-001, 4206-022-002, 4206-022-003, 4206-022-004, 4206-022-005 (4206-021-018 Not Part of CPA #6)

Prepared by: Gensler Gensler Architecture & Planning

ahbé

Ah'bé Landscape Architecture

Date:

Ningo Moore Ninyo & Moore Geotechnical Engineering

April 16, 2010

Revised October 2010

The Culver Studios

9336 West Washington Blvd. Culver City, Ca 90232

IPD Parking Design

Fehr & Peers Transportation & Traffic

ICF Jones & Stokes Historic

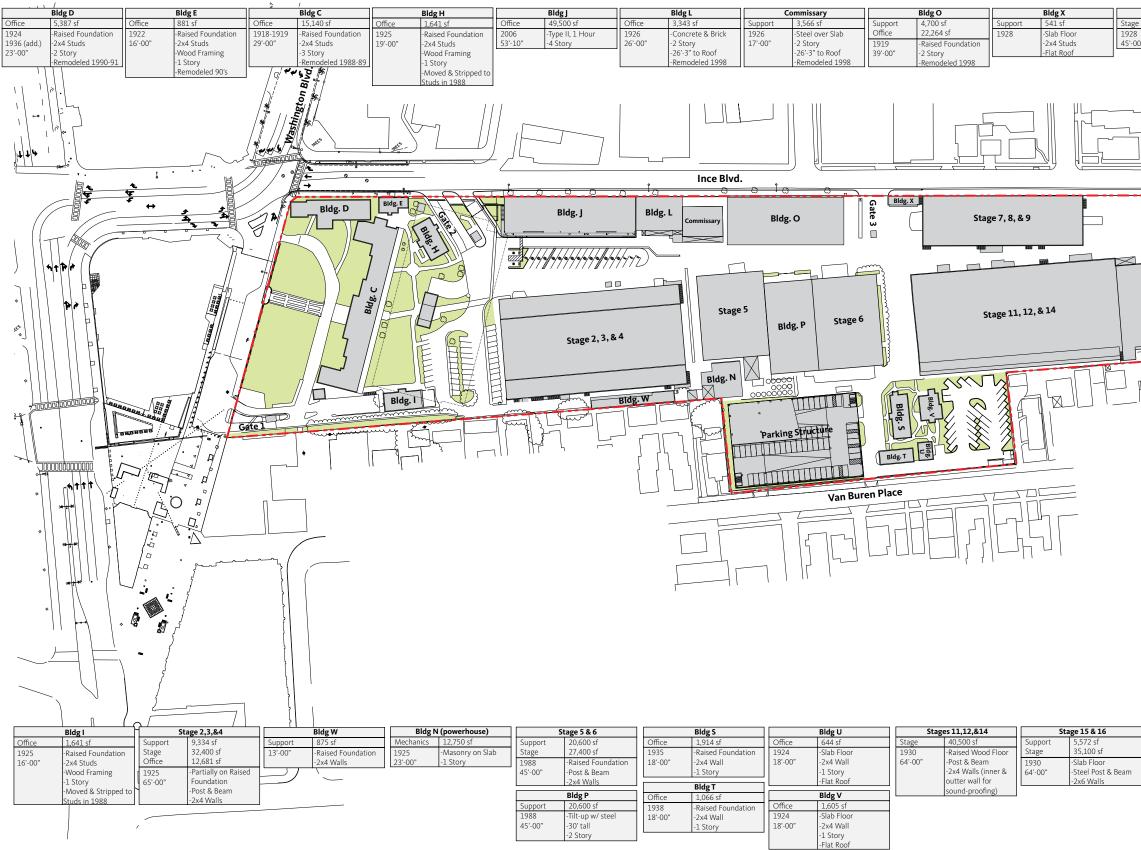




Existing Lot Conditions



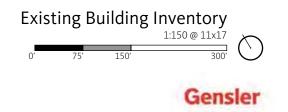
Gensler



Stages 7, 8, & 9		Stage 10		Bldg Y	
2	16,800 sf	Support	442 sf	Support	26,624sf
	-Post & Beam	Stage	3,280 sf	1930	-Slab Floor
0"	-2x4 Walls	32'-00"	-Raised Foundation	29'-00"	-2x4 Studs
			-Post & Beam		-1 Story/Mezzanine
			-2x4 Walls		
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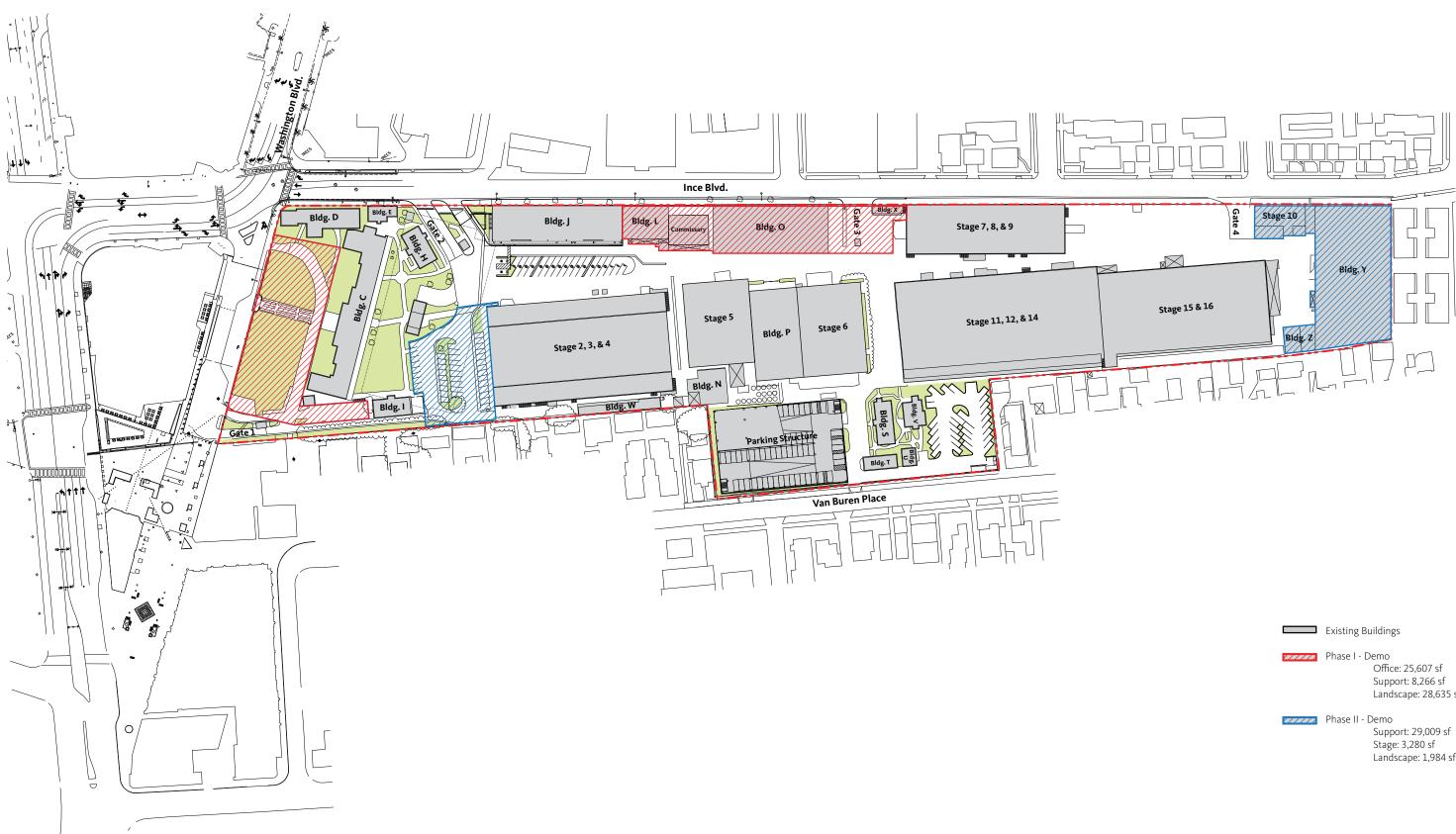
	Gate 4	age 10		
Stage 15 & 16			Bldg. Y	
		Bidg. Z		

Bldg Z	
Support	1,943 sf
29'-00"	-Raised Foundation -2x4 Wall (corrugated steel siding)





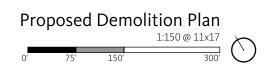




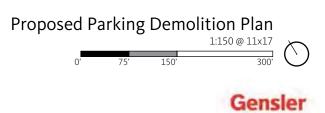
Proposed Lot Conditions

Landscape: 28,635 sf

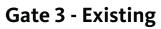
Support: 29,009 sf Stage: 3,280 sf Landscape: 1,984 sf







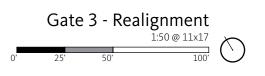




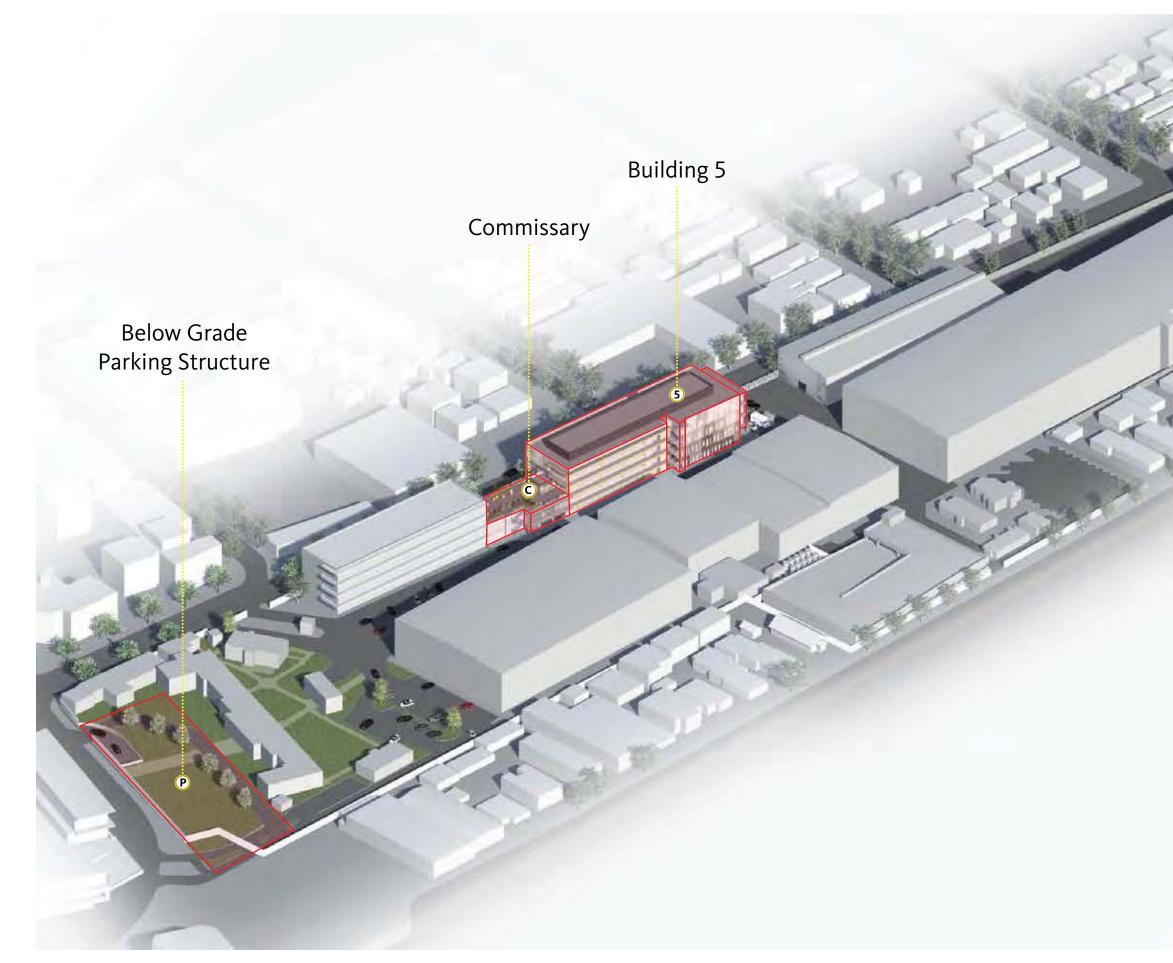
Gate 3 - Proposed

Gensler

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The Culver Studios: *Comprehensive Plan Amendment #6*



Office: 50,700 sf Support: 21,900 sf Parking: 319 spaces

Phase I - Birdseye View





Phase I Studio Lot Elevation

 Materials

 Image: Glass Type 1
 Glass Type 2
 Glass Type 3
 Glass Type 4
 Image: Glass Type 4
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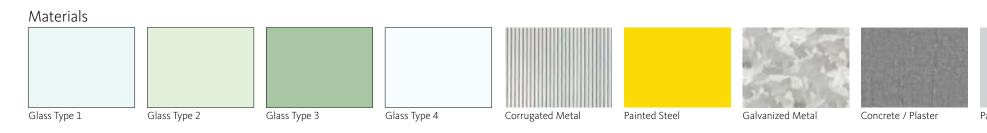
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Phase I - Studio Lot Elevation







Phase I Ince Blvd. Elevation

Painted Metal Railing

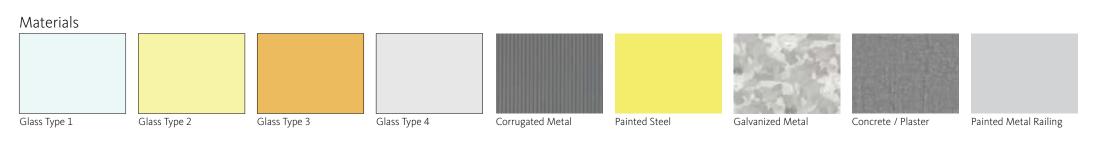
Phase I - Ince Blvd. Elevation







Phase I Gate 3 Section / Elevation



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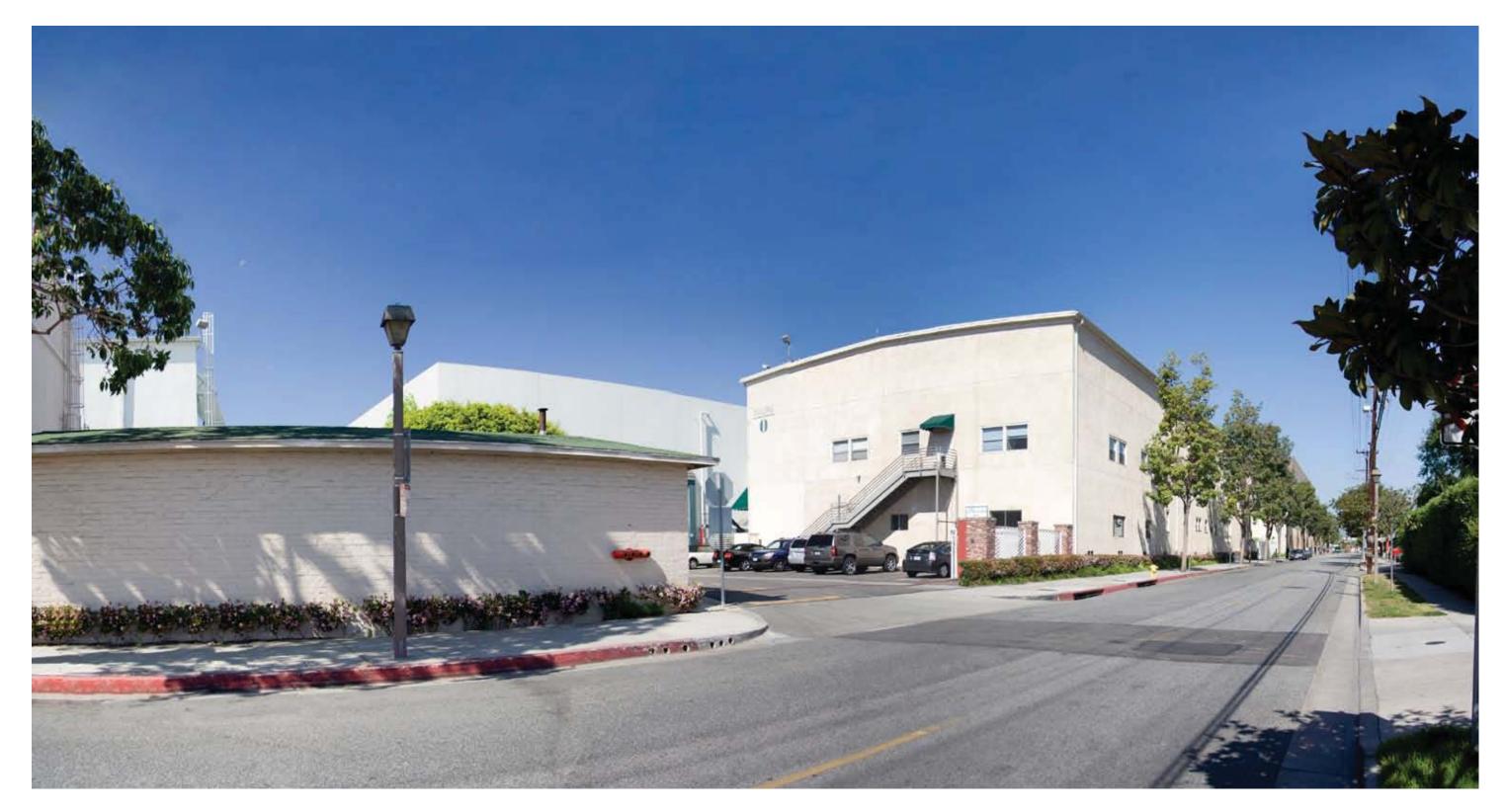
Phase I - Gate 3 / Adjacent Community Section / Elevation



Phase I - Existing Condition, Intersection of Ince Blvd. and Krueger St.

Gensler



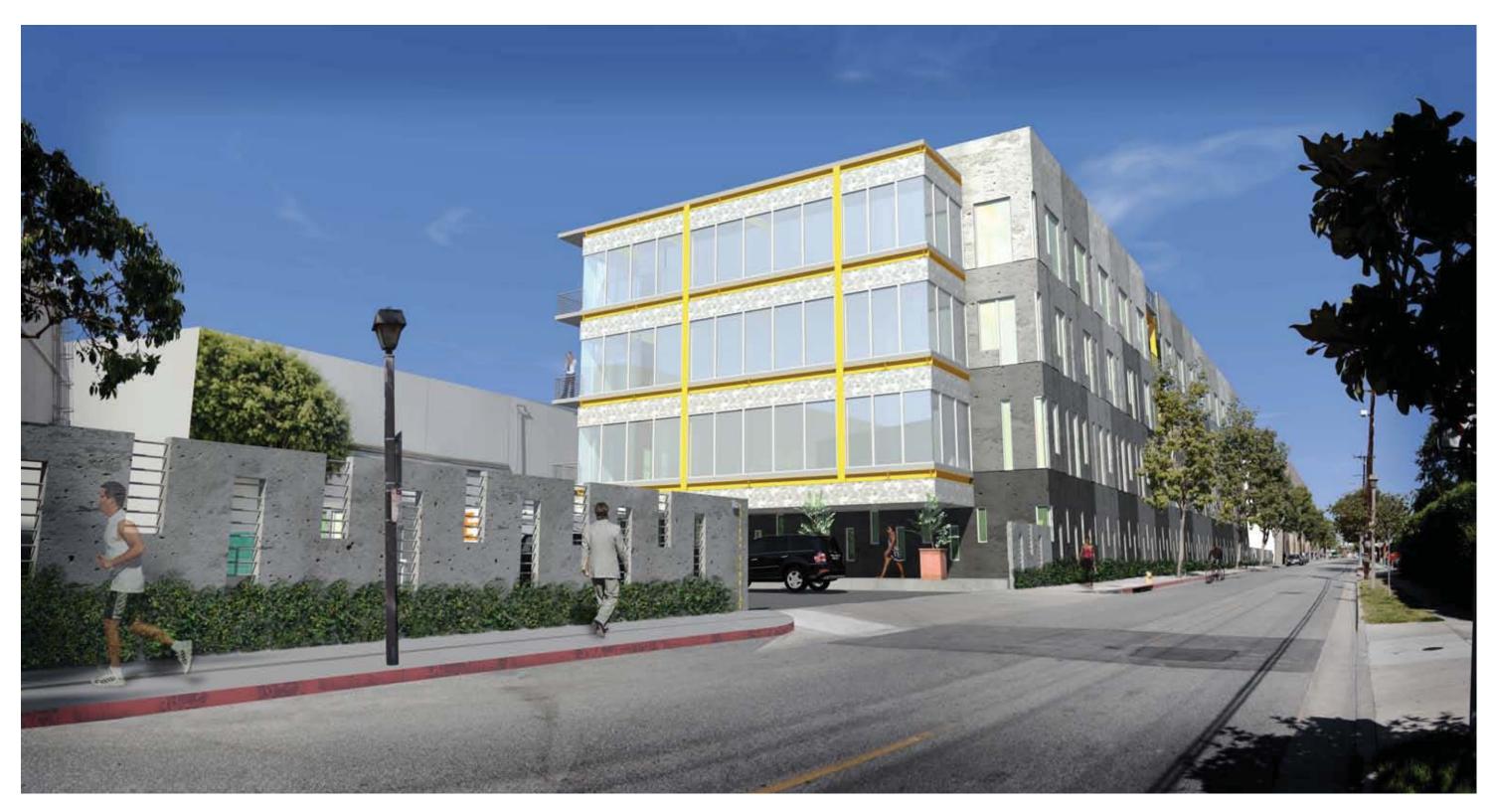


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Gensler

Phase I - Existing Condition, Ince Blvd at Gate 3



The Culver Studios: *Comprehensive Plan Amendment #6*

Phase I - Proposed Condition, Ince Blvd at Gate 3





Gensler

Phase I - Existing Condition, Front Lawn

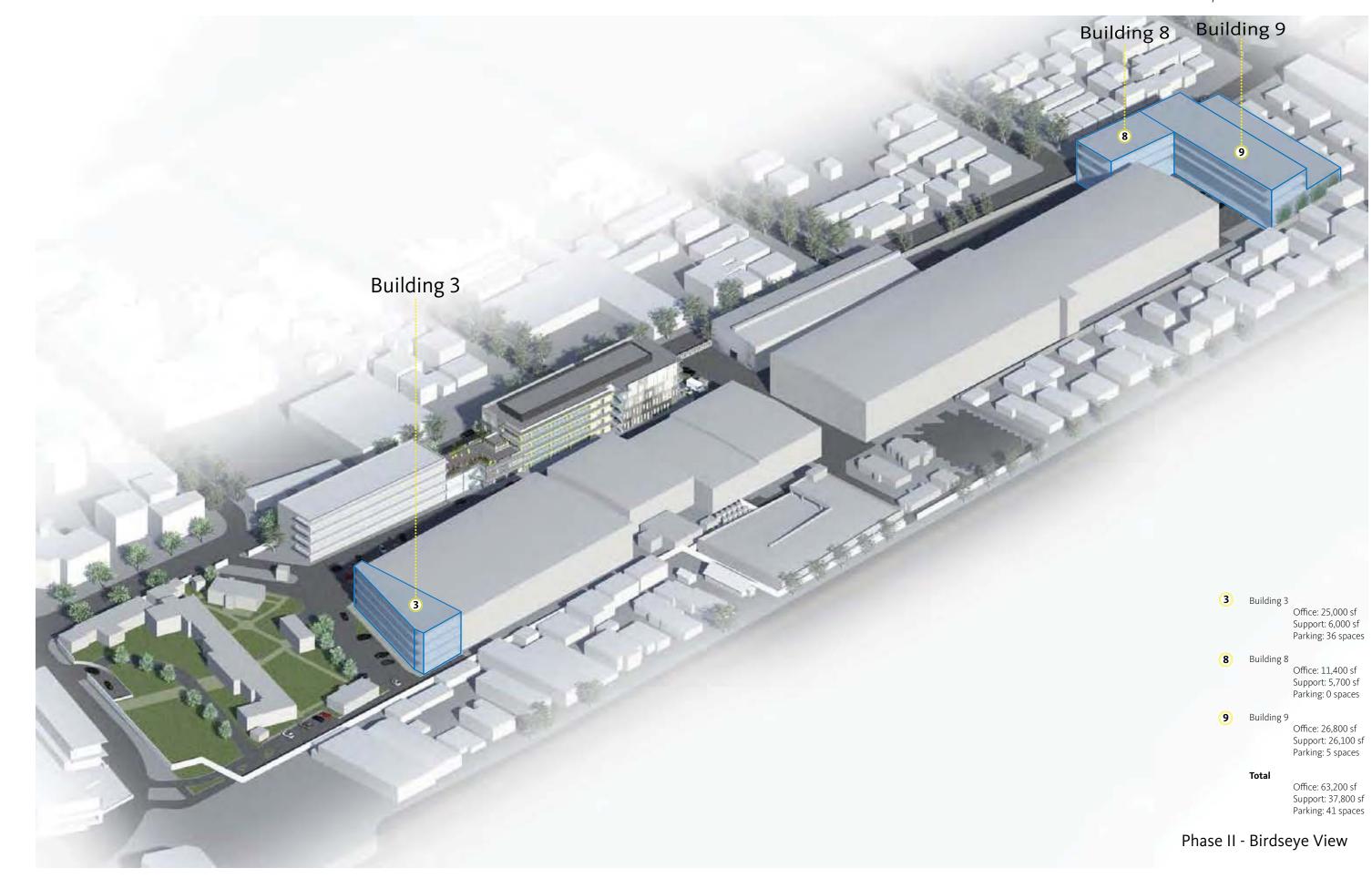


The Culver Studios: *Comprehensive Plan Amendment #6*

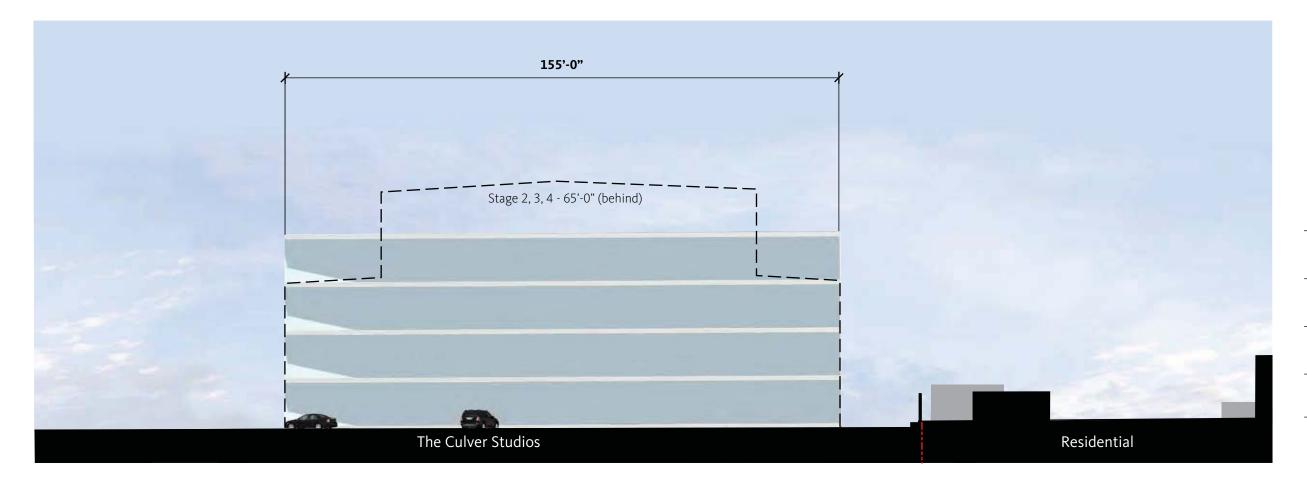
51

Phase I - Proposed Condition, Front Lawn









54'-00" Top of Roof	
	V
40'-06" Top of Slab - 4th	
	$-\mathbf{v}$
27'-00" Top of Slab - 3rd	
	$-\mathbf{v}$
13'-06" Top of Slab - 2nd	
,	-•
O'-OO" Top of Slab - 1st	
	$\mathbf{\nabla}$

North Elevation

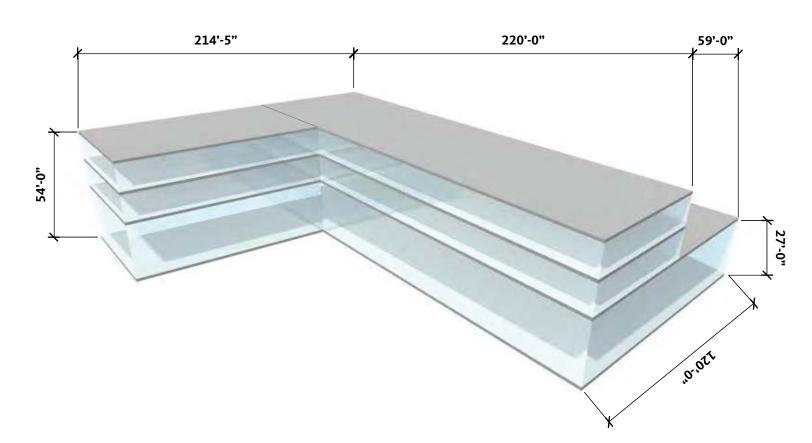
Phase II - Building 3 / Adjacent Community Section / Elevation



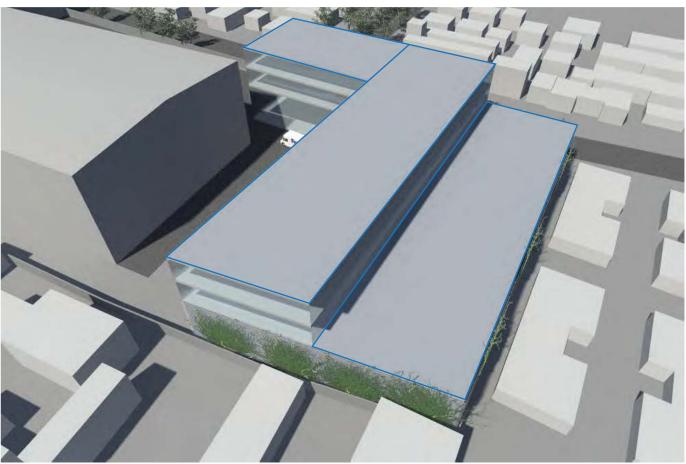
Phase II: Building 8 & 9 Massing

Program:

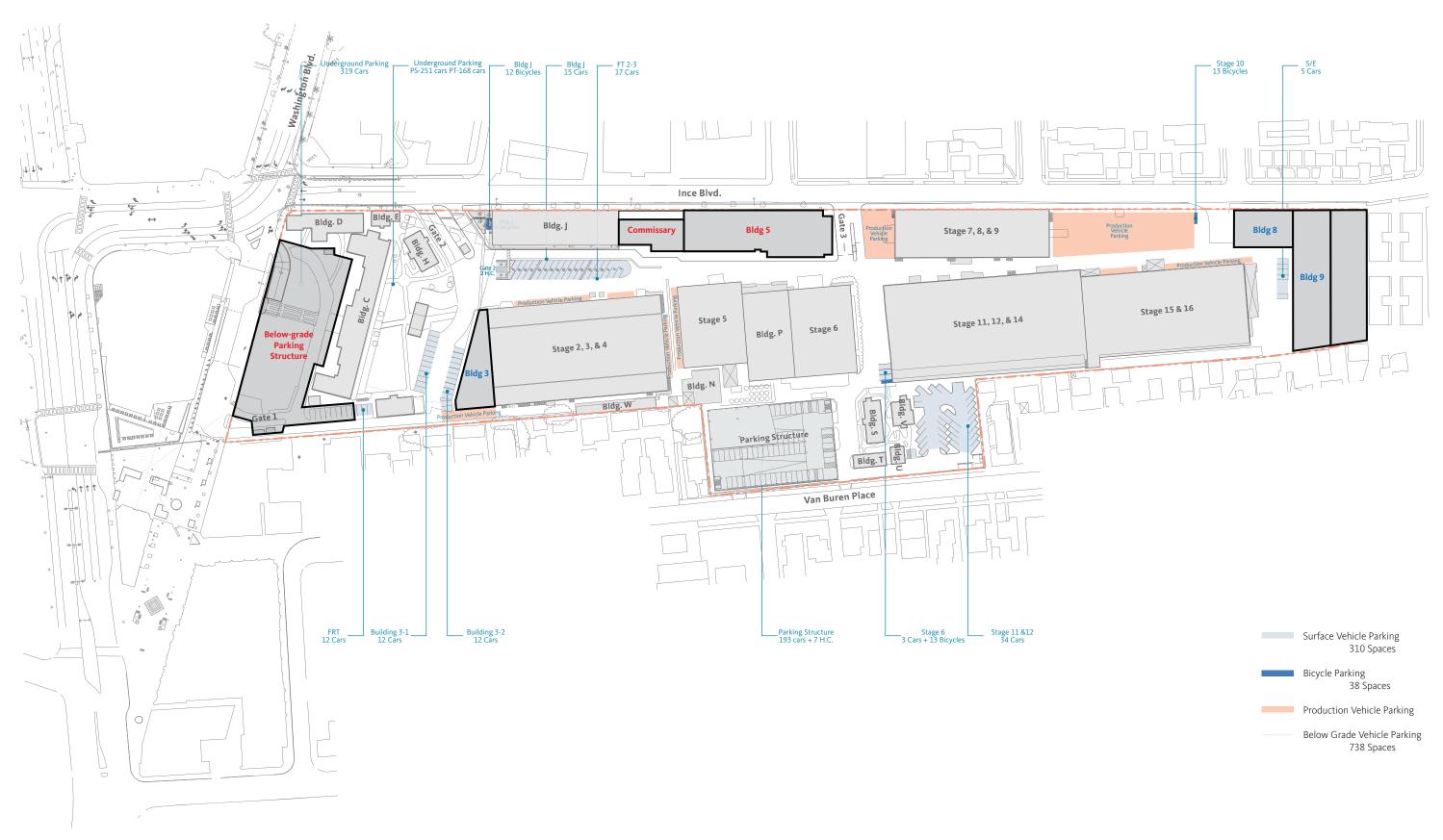
Building 8: Office: Support:	11,400 sf 5,700 sf
Building 9: Office: Support: Parking:	26,800 sf 26,100 sf 5 spaces
Total:	70,000 sf 5 spaces



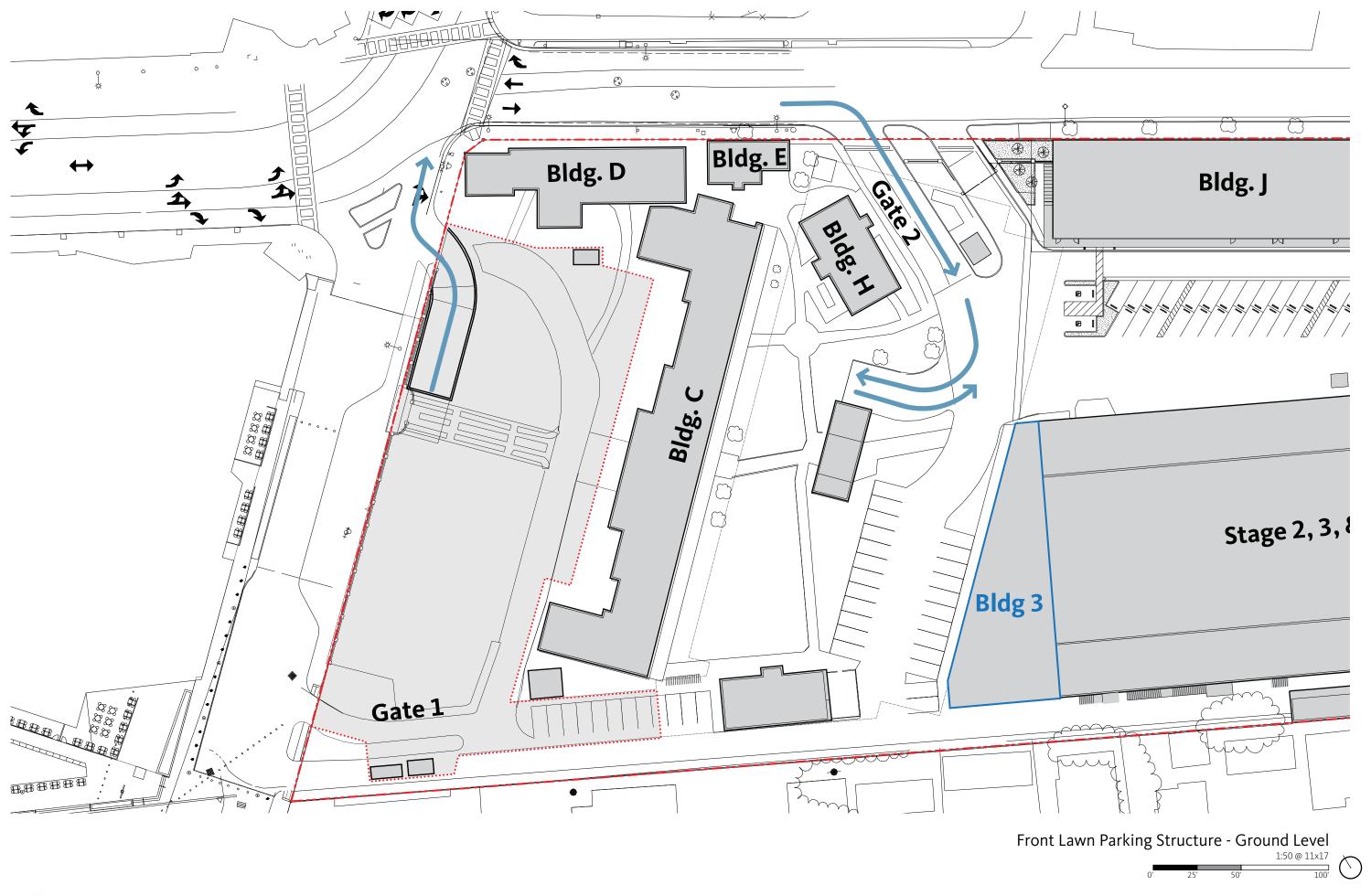






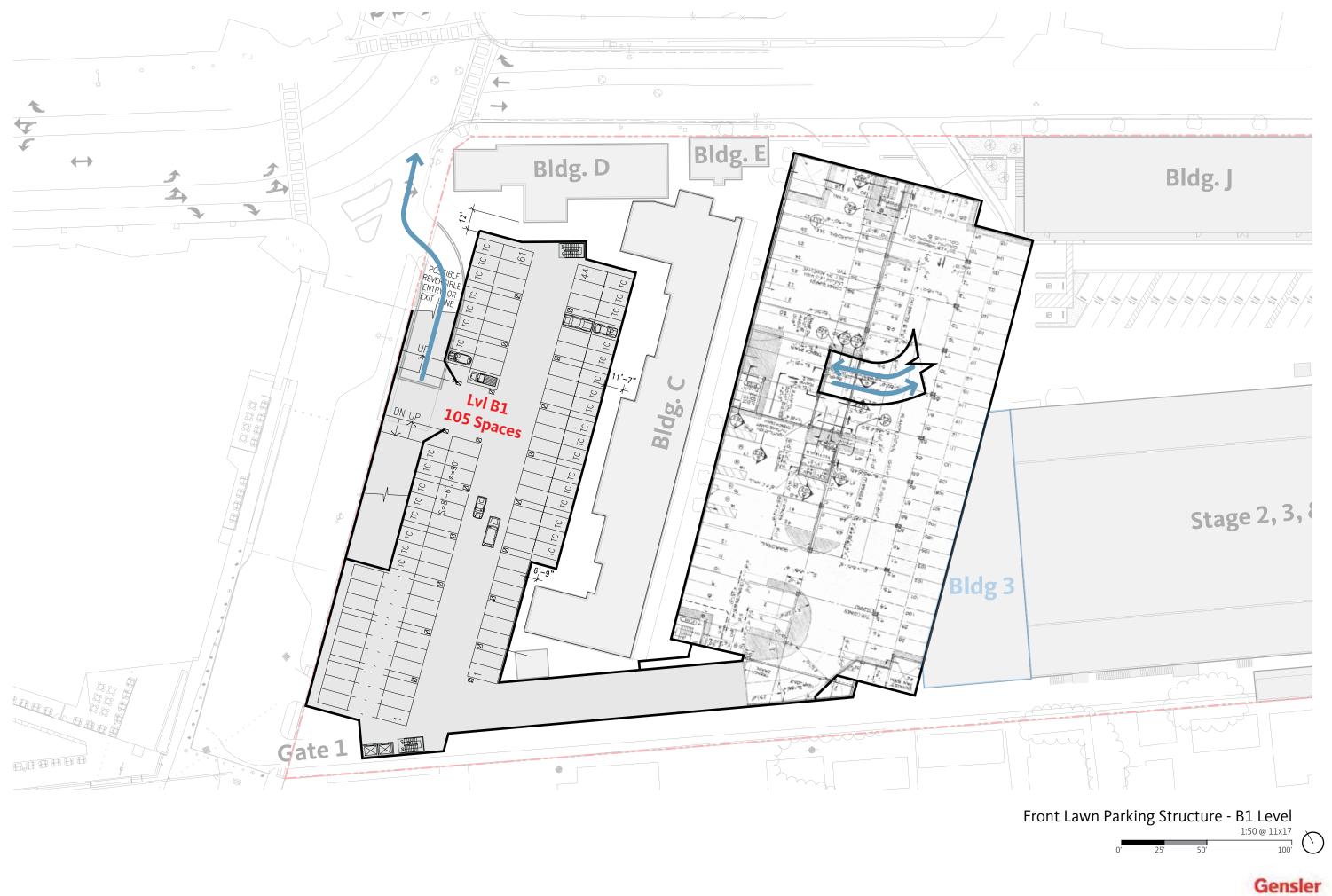


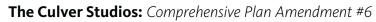


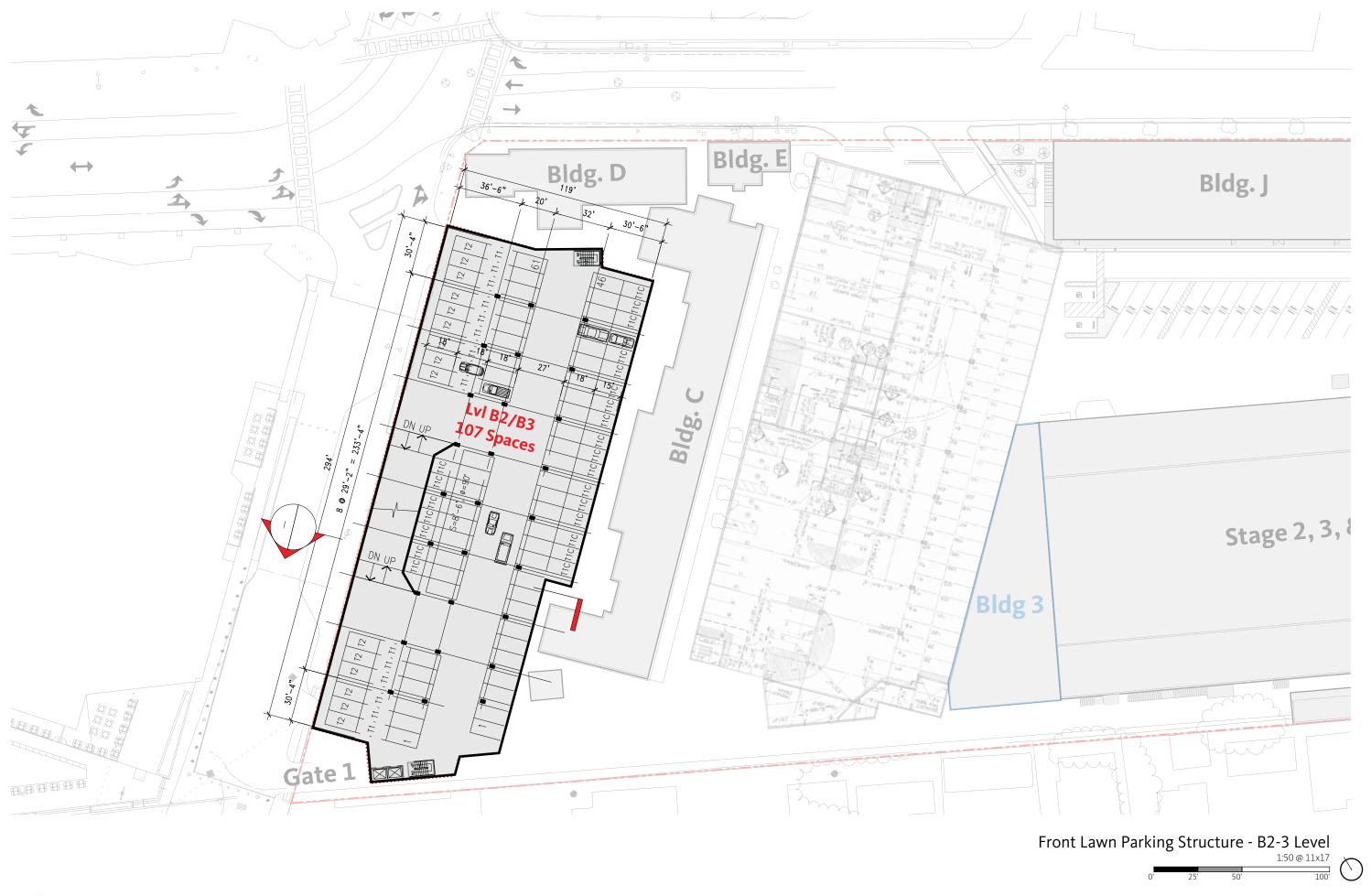


Proposed Parking

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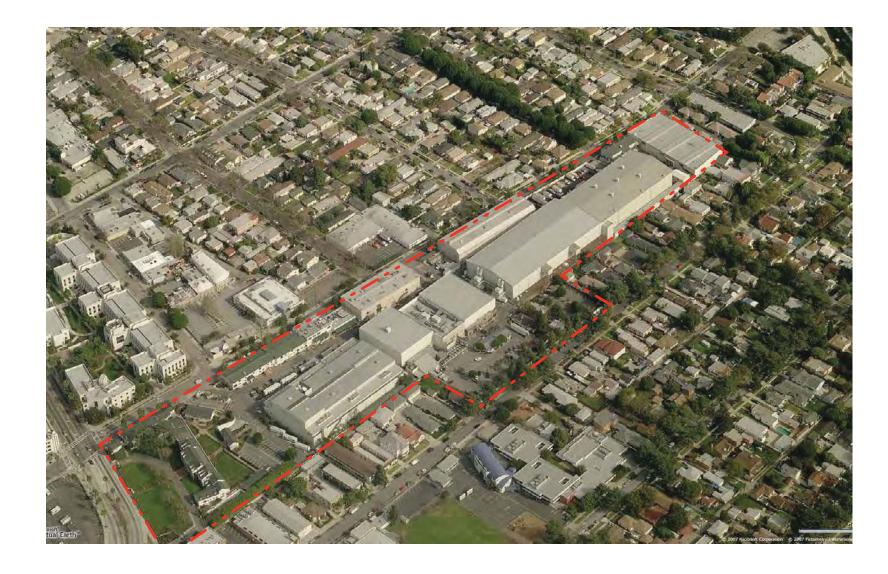
Proposed Parking

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Landscape



General Landscape Description

The existing site is roughly 13 1/2 acres and the current Master Plan delineates 41,700 sf (.96 acres) or roughly 7% of surface area as "landscape area". Albeit minimal, landscape on site has some historical significance that shall be maintained as the site continues to develop in the CPA 6 plans.

The site, as described in the current Master Plan document is catalogued into 3 main landscape typology areas; the Mansion Area, the Bungalow Area and the Stages. Although not technically considered part of the site, this document briefly documents existing landscape guidelines for the Ince and Washington Boulevards for reference purposes.

The Comprehensive Plan Amendment 6 proposes two phases of interventions that will impact the existing landscape plan, adding an additional 10, 124 sf of landscape area to the site. This brings the total landscaped area up to 51,824 sf (1.19 acres) for the studio lot.

In Phase 1, the Mansion area will be impacted with the implementation of the subterranean garage. Additional landscape area will be added with the site's proposed interventions along Ince Boulevard at Gate 3, Building 5.

In Phase 2, a minor reduction of landscape area is proposed with the addition adjacent to Stage 2,3 and 4.

The site's existing landscaped areas are kept to a minimum and is used primarily as an aesthetic backdrop to the studio's buildings. Landscape planting is limited to the perimeters of buildings and screen some of the large studio building façades.



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The Mansion Area

Being the most significant landscape feature on the studio lot, the Mansion Area consists of a large front lawn area that faces Washington Boulevard and a rear lawn area that acts as an interior courtyard for the employees on site. In both areas significant ornamental planting can be found in beds around the perimeter of the buildings and lawn edges.

The front lawn area is an iconic image for the studio site and has had a significant presence and connection to downtown Culver City throughout the site and area's history.

Defining elements within the Mansion Area

The Lawn and Driveway: The expansive lawn area creates a foreground and visual connection between the public streetscape and the Mansion. The lawn is defined by a semi-circular drive on the studio side and a brick and white lattice perimeter fence on the Washington edge.

The Trees: Part of the defining front lawn landscape is the presence of several large canopy trees. The most Iconic are six (6) Platanus racemosa (California Sycamore) trees which have been on the site since the studio's conception. Also found in this area are three (3) large Cedrus deodora (Deodar Cedar) trees, two (2) multi-trunked Betula alba. (Birch) trees, two (2) Peach trees and some cedars trees. The cedar trees may have been part of the original landscape design, however they that have long since overgrown their original use as part of an ornamental hedge garden. (See historic period landscape research)

The Hedge: Leading up to the Mansion's front entry is a formal hedged path that bisects the front lawn area and encloses a formal Rose garden. A crisp hedge also follow the site's perimeter along the fence on Washington Ave.

Raised Ornamental Gardens: Perched on a small grass mound, the Mansion's base is planted with an ornamental garden of hedges and flowering plants. Tall conical hedges also compliment the colonial revival style of architecture nicely.



Existing Landscape - The Mansion Area

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The Historical Significance

For the most part the minimal character of the site's landscape has been consistent throughout the site's history. The growth and alterations of plant material combined with maintenance and general gardening practices have transformed the site overtime from it's original design.

As mentioned earlier, the Mansion's front lawn area has been an iconic element dating back to the early history of the site. The historical report describes the Mansion anrea's front lawn as "having several small additions such as fencing, signage, and pathways added as stewardship of the site as it evolved. The front lawn area is a significant attribute to the historical viewscape of the studio site from Washington Blvd; the lawn reinforces the historical character of the studio site by maintaining the relationship between the studio buildings and the surrounding neighborhood, a relationship instituted during the initial site planning phase."

To trace the lawns history we used historical imagery as reference and highlighted the various additions and changes the lawn area has undergone. Three periods have been identified as defining moments in the landscapes progression: before 1925, between 1925 and 1935, today. Within those periods we've noted significant elements that contribute to the site's landscape history. These elements were used to guide the proposed design proposed for the lawn area.

Please note that these maps are for reference only, and depict the historical condition to the best of our knowledge.



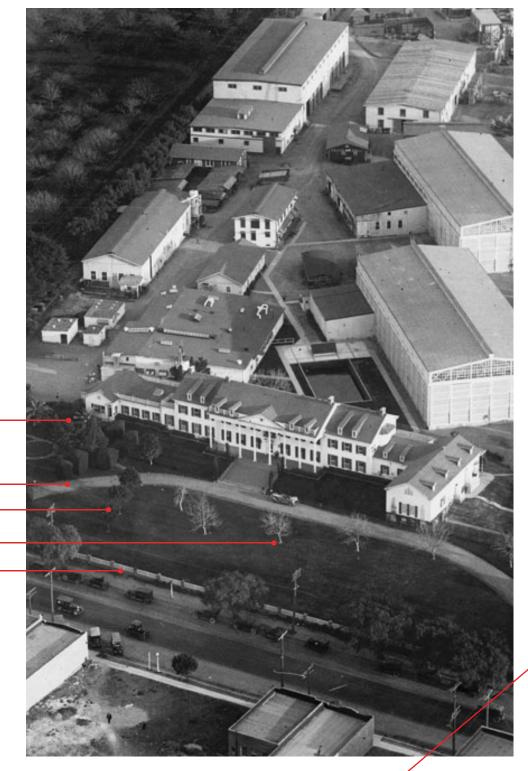
Gensler ahbé

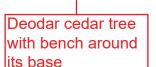


Ornamental Garden ——		
omamoniare	ardon	
Entry Drive		
Citrus Trees		
Ollius nees		

Sycamore Trees

Lattice Fence





Before 1925

The image to the right shows the Studio in 1925, and is probably very close to what the studio and the front lawn area looked like when the Ince Studio's opened in 1919.

The lawn area creates a foreground and visual connection between the public streetscape and the Mansion and is defined by a semi-circular drive that provides access from the Street and a brick and white lattice perimeter fence along its perimeter. The driveway is seen as light in color which suggests it was either dirt or a decomposed granite surfacing.

Several trees are found planted within the lawn. Five appear to be the Sycamore trees that are found on the site today, and the other trees we're assuming are some form of fruit tree based on the postcard image below.

The Sycamore, the driveway, and the brick and white lattice fence are still very visible today and are considered to be of historical significance.

A 2.5'-3' hedge is planted around the base of the buildings facade and an ornamental garden appears to be present along the eastern edge of the lawn. The postcards below show this area with clipped hedges, evergreen trees and a seating area. These elements have been lost or changed as the site has developed overtime.

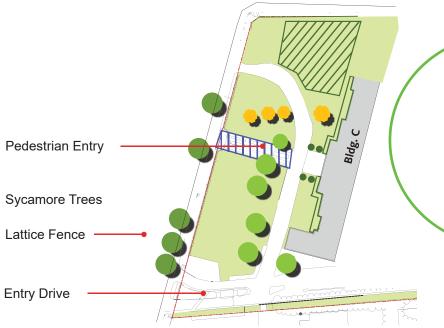


Historical photo's downloaded from LAPL Photo Database. Right: Date. [ca. 1925] Aerial view of Ince Studios . Above: Date 1920. Postcard Image

Between 1925 -1935

Sometime between 1925 and 1935 a pedestrian entry was added to the front lawn area that led directly to the front door and bisected the front lawn area in two. The path was lined with a low hedge of buxus, boxwood and tea roses were planted down the center of the path. Although overgrown this path and it's associated planting of TERNATIONAL boxwoods and tea roses is still present today. The 1935 photo to the right clearly shows the 2.5' - 3' uniform hedge planted around the base of the Mansion's perimeter and tall columnar hedges flank the grand staircase at the buildings front entry. These elements are no longer visible in the landscape today. hese look like two different becimens - the trunk is Columnar Hedge ifferent, and the main trunk of ne older one appears to have Pedestrian Entry een cut down in the black and white photo. The left tree in the Boxwood Hedge olor photo also doesn't look as Tea Roses old as the one on the right.

Plan between 1925 and 1935





Today. 2010

photograph.

Overtime however some changes of in the landscape has occurred. Some can be attributed to landscape material growing, and or dieing, and changes in maintenance practices and preferences in ornamental styles. This changes include: • The presence of 6 sycamore trees verses the 5 shown in the 1925

photo.

As previously described many of the landscape elements from the site's past are still contributing factors in the landscape today. The lawn, the driveway, the lattice fence, the pedestrian entry, and the Sycamore trees that can be seen today are visible in the 1935

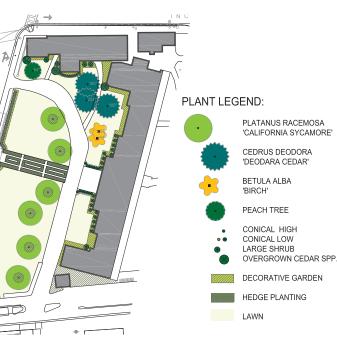
• The 2.5'- 3' perimeter hedge around base of building has been replaced with an ornamental planting that uses a combination of flowering and hedge plants.

• The boxwood hedge has become overgrown, blocking access along the pedestrian entry path.

• The ornamental garden is no longer present.. Three large cedar trees may have been remnants of this garden but have long since overgrown there ornamental character.

· New conical hedges are present along the building facade. · Low conical hedges flank the entry stair.

Landscape Condition 2010

















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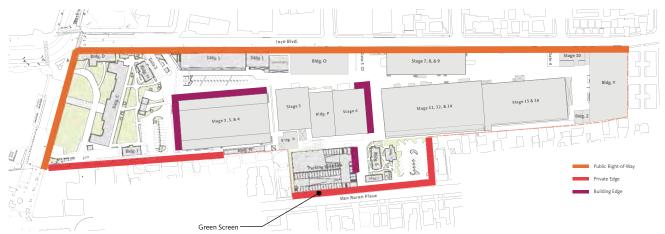








Existing Landscape - The Bungalow Area



Existing Landscape - Perimeter and Stage Areas

The Bungalow Area

The Bungalow cottages are nestled in a lush garden courtyard setting of ornamental garden beds and large canopy trees. The mature canopy casts shade over the bungalows and its adjacent parking lot and provides screening from the adjacent neighborhood.

By far the most dominant tree species found within this area are Liquidambar styraciflua (Sweet gum) and Ficus spp. (Ficus).

Perimeter and Stage Areas

The Washington Boulevard streetscape has no landscape on the studio side of the street. This makes the Mansion Area landscape significant in helping to define a pedestrian scale streetscape. A new landscape plan for the plaza area is planned that would add street trees and landscape areas along Washington

The Ince Boulevard streetscape is planted with Tristania Conferta (Brisbane Box) trees within the public right of way. Their tall upright form helps to screen the studio's tall building facades from the adjacent neighborhood.

Also helping with the transition from the studio scale to the neighborhood residential scale is the presence ornamental landscape planting at the base of some studio buildings. Landscape within the interior of the lot is kept to a minimum and restricted to narrow linear planters at the base of the site's buildings and is commonly used as a means of masking some of the large blank facades that are intrinsic to the studio buildings. Both Liquidambar styraciflua (Sweet gum) and Ficus spp. (Ficus) are the most commonly used tree.

Master Plan General Landscape Guidelines:

All landscape design interventions shall consider and maintain where feasible the unique qualities and character of the historical studio lot district.

Plant materials shall be selected to fit in with the existing site landscape.





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Jasmine-*Trachelospermum*





Garden Gladiolus -Gladiolus



Creeping Fig - Ficus pumila



As previously described the CPA6 proposes two phases of interventions that will impact the existing landscape plan. In Phase 1, the Mansion area's front lawn ares will be impacted with the implementation of the subterranean garage. This will impact the streetscape along the Washington frontage, in addition small landscape areas along Ince Boulevard at Gate 3, Building 5 will be added/ modified. The following pages outline the design intent for these areas at the schematic level.



Breath of Heaven - Coleonema



Tea Roses - Rosa spp.



Xylosma - Xylosma congestum



Privet Hedge - Ligustrum spp.



Rhapheolepsis - *Rhapheolepsis spp*





Santa Barbara Daisy - Erigeron spp.



Surinam Cherry - Eugenia uniflora

Understanding the site's landscape progression overtime, and its historical significance to Culver City's downtown area, helped guide the schematic design for CPA6.

General Landscape Guidelines:

The intent behind the landscape of the studio lot is to maintain the existing historical landscape character of the site. The following general guidelines should be followed in Phases 1 and 2. We've also provided in the following pages a more detailed description of the proposed landscape interventions during Phase 1 to ensure our design intent is implemented in the Phase 1 design development and construction documents.

- shown to the right.
- qualities and character of the historical studio lot district. replaced with the same species.
- originally intended scale.
- and require minimum maintenance efforts.
- · Mulch shall be provided for all planted areas.
- neighborhoods and/ or streetscape.
- cabinets, and other similar elements.



of the Nile - Agapanthus Lilv

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Daylillies - Hemerocallis spp.



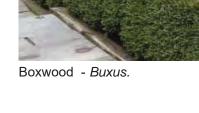












• To maintain a consistent landscape character new planting interventions should take advantage of the existing planting palette that exists on site. Several of these species are

• All landscape design interventions shall consider and maintain where feasible the unique

· Any planting material deemed to have historical significance shall be preserved and/ or

• Planting material shall be replaced once it has become overgrown and deviates from it's

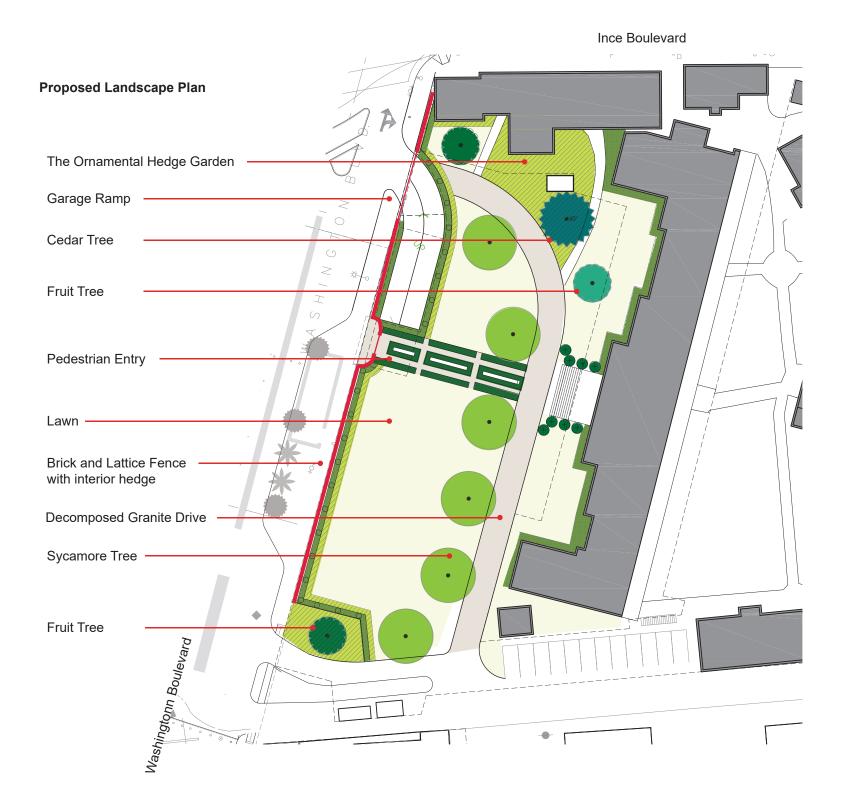
• New plant material, unless replacing plant material deemed to have historical significance, shall be suitable for the Southern California climate and have low to moderate water needs

• Irrigation shall be provided for all planting areas.

• Where feasible plant material shall be planted between the property line and the building edge as a buffer/ screen between the studio building facades and the adjacent

• Planting material shall be provided to screen new building facades, parking facilities, service and loading areas, maintenance areas, storage areas, trash enclosures, utility

• Right-of-way planting shall conform to established and/or planned city design standards.



Phase One Enlargements: Mansion Area

Using the 1925 landscape plan as a departure point for CPA6 design investigation, a schematic master plan diagram has been developed. The proposed plan is intended to maintain the historical integrity depicted in 1925, while accommodating the integration of a subterranean parking structure. For the most part the proposed plan maintains the existing landscape condition by providing a maximum depth of 4' of planting medium on top of the parking structure. On structure planting is common practice in urban environments and successful vegetation can be maintained. Key components to the proposed design and it's implementation include:

The Lawn and Driveway:

The existing lawn will be replaced once the subterranean parking structure is built and a small portion will be lost due to the exit ramp configuration. The existing asphalt driveway will replaced with a decomposed granite surface and it's alignment slightly modified so that's a smoother curve and can accommodate the garage exit ramp.

The Trees:

The six (6) *Platanus racemosa* (California Sycamore) trees will be boxed and stored on site, under the supervision of a certified arborist during the garages construction. Once construction is complete they will be replaced to a similar location and spacing along the driveway edge as they have been since the studio's opening. The trees will be slightly realigned and spaced to make a more uniform appearance. One of the three large *Cedrus deodora* (Deodar Cedar) trees will therefore be saved, boxed and stored the same as the *Platanus racemosas*, and be replanted as part of an ornamental garden. The cedars, which we are not considering to have any significant historical contribution, as they have grown significantly over time. All the trees within the lawn area have been evaluated by a certified Arborist and are good candidates for successful boxing, storage and replanting within 4' feet of soil. Two existing peach/ fruit trees will also be salvaged from the existing lawn and boxed, stored and replaced. An additional fruit tree is proposed adjacent to the ornamental hedge garden area,

The arborist has recommended box sizes to accommodate each trees root growth and suggested methods to help the tree acclimate to an over structure condition. Should trees not survive replanting, replacement specimens will be selected to match size and habit of the specimen lost.

The Hedge:

The formal hedged path that bisects the front lawn area and encloses a formal Rose garden, and the hedge that follows the inside edge of the lattice perimeter fence will be removed and replaced with the same species, only smaller specimens (5 gallon container sizes) and evoke the original scale of planting that is depicted in the 1925 photograph.

The existing ornamental planting around the edge of the building will be removed and replaced with a 2.5' - 3' hedge that is depicted in the 1925 photograph.

The Ornamental Hedge Garden:

A small ornamental garden of clipped hedges is proposed at the eastern edge of lawn as a symbolic gesture to what was planted there in 1919 before building x was constructed. A bench could be constructed around the Cedar tree's base as we see in the early postcard photograph.



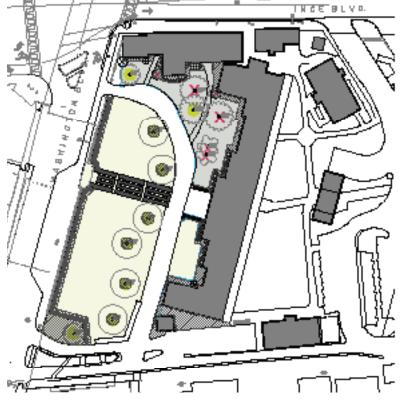


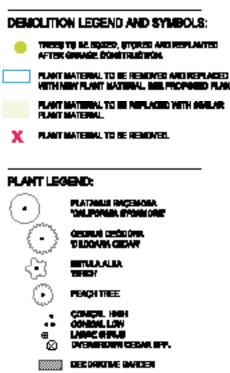
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Schematic Demolition Plan

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HERE PLATER

Schematic Construction Plan



Understanding and Implementing the Front Lawn Plan

In order to achieve the proposed design, some degree of demolition on the site must occur. To understand this better we have provided a schematic level demolition and planting plan that will be used as a guide for the development of construction documents when the time comes.

The first step will be to preserve the existing trees that the proposed plan specifies to box, store and transplant. Valley Crest Tree Company, experts in the business of relocating, installing, supplying and caring for specimen trees came to the site and evaluated the trees that we wanted to save. Due to the size and branching structure of the specimen trees, and the physical limitations of urban transport, Valley Crest recommended that the trees be stored on site.

Aside from the brick and lattice fence the remainder of the lawn area will be demolished for construction and replaced according to the proposed construction plan.

PROPOSED CONSTRUCTION LEGEND:



EXISTING/ TRANSPLANTED PLATANUS RACEMOSA 'CALIFORNIA SYCAMORE'

EXISTING/ TRANSPLANTED CEDRUS DEODORA 'DEODARA CEDAR'

EXISTING/ TRANSPLANTED PEACH/ FRUIT TREE NEW PEACH/ FRUIT TREE (24" BOX)

NEW CONICAL HEDGE (24" BOX)

NEW ORNAMENTAL GARDEN (MIXED SIZES)

REPLACEMENT HEDGE PLANTING (15 GALLON) REPLACEMENT ENTRY PLANTING (5 GALLON)

NEW LAWN

NEW DECOMPOSED GRANITE DRIVEWAY

EXISTING/ PRESERVED BRICK AND LATTICE PERIMETER FENCE WITH NEW ENTRY GATE



Existing view of lawn from the Mansion's front steps.

Simulation of proposed plan. View of lawn from the Mansion's front steps.



Existing view of lawn from the Culver City edge.

Simulation of proposed plan. View of lawn looking from the Culver City edge.









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Landscape

Appendix K Professional Qualifications





EDUCATION

Ph.D., Art History, University of California, Los Angeles

M.A., Architectural History, School of Architecture, University of Virginia

Certificate of Historic Preservation, School of Architecture, University of Virginia

B.A., Art History, Oberlin College

30 YEARS EXPERIENCE

AWARDS

2014 Preservation Award, The Dunbar Hotel, L.A. Conservancy

2014 Westside Prize, The Dunbar Hotel, Westside Urban Forum

2014Design Award: Tongva Park & Ken Genser Square, Westside Urban Forum

2012 California Preservation Foundation Award, RMS Queen Mary Conservation Management Plan, California Preservation Foundation

PROFESSIONAL AFFILIATIONS

California Preservation Foundation

Santa Monica Conservancy

Los Angeles Conservancy

Society of Architectural Historians

National Trust for

Margarita Jerabek, PhD

Historic Resources Director

Margarita Jerabek has 30 years of professional practice in the United States with an extensive background in historic preservation, architectural history, art history and decorative arts, and historical archaeology. She specializes in Visual Art and Culture, 19th-20th Century American Architecture, Modern and Contemporary Architecture, Architectural Theory and Criticism, Urbanism, and Cultural Landscape, and is a regional expert on Southern California architecture. Her qualifications and experience meet and exceed the Secretary of the Interior's Professional Qualification Standards in History, Archaeology, and Architectural History. Margarita has managed and conducted a wide range of technical studies in support of environmental compliance projects, developed preservation and conservation plans, and implemented preservation treatment projects for public and private clients in California and throughout the United States.

Relevant Experience

Margarita has prepared a broad range of environmental documentation and conducted preservation projects throughout the Los Angeles metropolitan area and Southern California. She provides expert assistance to public agencies and private clients in environmental review, from due diligence through planning/design review and permitting and when necessary, implements mitigation and preservation treatment measures on behalf of her clients. As primary investigator and author of hundreds of technical reports, plan review documents, preservation and conservation plans, HABS/HAER/HALS reports, construction monitoring reports, salvage reports and relocation plans, she is a highly experienced practitioner and expert in addressing historical resources issues while supporting and balancing project goals.

She is an expert in the evaluation, management and treatment of historic properties for compliance with Sections 106 and 110 of the NHPA, NEPA, Section 4(f) of the Department of Transportation Act, CEQA, and local ordinances and planning requirements. Margarita regularly performs assessments to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and assists clients with adaptive reuse/rehabilitation projects by providing preservation design and treatment consultation, agency coordination, legally defensible documentation, construction monitoring and conservation treatment.

Margarita is a regional expert on Southern California architecture. She has prepared a broad range of environmental documentation and conducted preservation projects throughout the Los Angeles metropolitan area as well as in Ventura, Orange, Riverside, San Bernardino and San Diego counties. Beyond her technical skill, she is a highly experienced project manager with broad national experience throughout the United States. She currently manages PCR's on-call preservation services with the City of Santa Monica, County of San Bernardino Department of Public Works, City of Hermosa Beach, Los Angeles Unified School District, and Long Beach Unified School District.





EDUCATION

M.S., Historic Preservation (Emphasis: Conservation Science), Columbia University, New York, New York

B.S., Design (Emphasis: Interior Architecture), University of California, Davis

B.A., Art History, University of California, Davis, 2002

9 YEARS EXPERIENCE

PROFESSIONAL AFFILIATIONS

California Preservation Foundation

Los Angeles Conservancy

Santa Monica Conservancy (Volunteer Docent for the Shotgun House)

Docomomo SoCal

Association of Preservation Technology Western Chapter

Society of Architectural Historians

AWARDS

Joel Polsky Academic Achievement Award, American Society of Interior Designers

Amanda Kainer

Senior Architectural Historian

Amanda Kainer has more than eight years of professional and academic experience in the practice of historic preservation and architectural history. Amanda has conducted extensive archival research, field observation, recordation, and prepared survey documentation and assisted in database management for numerous historic resources projects. She has training and substantial experience in the evaluation and conservation of art and architecture and passion for interior design.

Relevant Experience

Amanda has completed and co-authored a wide range of architectural investigations including historic resources assessment and impacts analysis reports for compliance with CEQA, character-defining features reports, plan reviews, investment tax credit applications, Section 106 significance evaluations, and HABS documentations. She has also performed extensive research, survey work, and prepared numerous landmark and preliminary assessment reports as a part of ESA's On-Call Historic Preservation Contract with the City of Santa Monica.

She is involved a diverse set of projects and analyses. These include anything from a California Register nomination for the UCLA Faculty Center to a paint analysis for a Churrigueresque style 1920s commercial building in Santa Monica. She has co-authored Section 106 reports for the residential development in Thousand Oaks, Santa Monica Pier, Avalon Fuel Dock on Catalina Island, and a Mid-Century roadside motel in Bakersfield. For LAUSD, Amanda authored a character-defining features analysis for seven historic schools, provided historic analysis for an MND, and preliminary resource evaluations and plan reviews for various historic schools.

Historic Resources Assessments: Amanda has contributed to the research, site inspections, and report preparation of a number of historic resources assessments in the Los Angeles metropolitan area for compliance with CEQA. Amanda has evaluated a number of different types of potential historical resources, including single-family and multi-family residences, banks, commercial buildings, schools, hotels, and cultural landscapes in Beverly Hills, Venice, Los Angeles, and Santa Monica.

Large Scale Survey Experience: She was a contributing author for three major Community Redevelopment Agency of the City of Los Angeles– Adelante Eastside, Wilshire Center/Koreatown, and Normandie 5 Redevelopment Areas. Amanda also served as Survey Team Leader and co-author for the comprehensive survey of over 4,000 objects of fine and decorative arts aboard the RMS Queen Mary in Long Beach. Additionally, Amanda helped complete the district-wide survey and evaluation of the Long Beach Unified School District and a windshield survey of Hermosa Beach for the Historic Resources Chapter of the Hermosa Beach General Plan Update.





EDUCATION

Master's Degree, Historic Preservation, University of Southern California, Los Angeles

B.A., History, University of Oklahoma, Norman

3 YEARS EXPERIENCE

Christian Taylor

Associate Architectural Historian

Christian Taylor is a historic resources specialist with academic and professional experience in assessing historic structures and contributing to California Environmental Quality Act (CEQA)-level documents. With completion of his master's degree imminent, Christian will continue to hone his skills in management of rehabilitation and restoration projects, preparation of documentation of historic contexts, and the use of non-invasive material investigation methods.

Representative Experience

Working for the California Department of Parks & Recreation (DPR), restoration contractors, and environmental consultants, Christian has become versed in the research, writing, and assessment of historic resources from the public and private perspective.

Serving first as a history intern and then interpretive specialist for the DPR, Christian served as the lead representative for the Crystal Cove State Historic Park during the second phase of the cottage restoration project program. His primary role was to liaise with contractors to ensure the project met both the Parks Department and the Secretary of the Interior's Standards.

Also with the DPR, Christian worked alongside resident historians to organize the contributing documentation and assist with the historic landscape report documenting La Purisima Mission's structures and their significance in relation to the original restoration work done in the 1930s.

Christian also familiarized himself with the historic restoration field through the preparation of thousands of pages of documentation associated with the Wilshire Temple and Atascadero City Hall projects. Christian has performed architectural history research, survey and assessment work for the Hermosa Beach General Plan Update and the Capitol Mills project in Los Angeles, and assisted with historic resources assessments for a commercial property and an education center in West Hollywood as well as multiple residential properties in Venice and Los Angeles.

APPENDIX D-2

Phase 1 Archaeological and Paleontological Resources Report

A PHASE-1 ARCHAEOLOGICAL/PALEONTOLOGICAL RESOURCE SURVEY AND IMPACT ASSESSMENT OF THE CULVER STUDIOS PROJECT, 9336 W. WASHINGTON BOULEVARD, CULVER CITY, CALIFORNIA, 90232

By:

Matthew A. Boxt, Ph.D. 2043 S. Dunsmuir Avenue Los Angeles, California 90016

For:

Hackman Capital Partners 11111 Santa Monica Boulevard, Suite 1100 Los Angeles, California 90025

April 27, 2015

Results: Historical Resources Detected Archaeological Construction Monitoring Recommended

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MANAGEMENT SUMMARY: A cultural and paleontological resource impact assessment was made of the 14-acre Culver Studios parcel in Culver City, California. The study property is located along the south side of W. Washington Boulevard between Ince Boulevard to the east and Van Buren Place to the west. Since the proposed development of 9336 W. Washington Blvd. could potentially impact hitherto undetected cultural (e.g., Native American and historic archaeological deposits) and/or paleontological resources, an evaluation of the parcel was implemented. This was done so as to identify any and all archaeological sites and paleontological localities that might exist within the project boundaries, to consider the potential impact to such resources, and to recommend appropriate mitigation measures so that such resources might be protected from adverse impacts, resulting from development. This report is designed to assist Hackman Capital Partners in achieving compliance with existing federal, California State, and municipal laws that regulate land development and govern the protection of archaeological, historical, and paleontological resources. Relevant cultural resource legislative statutes include (but are not limited to): California Environmental Quality Act (CEQA) and its local interpretations, the National Environmental Policy Act (NEPA) of 1969, and the National Historic Preservation Act (NHPA) of 1966, as amended through 2006.

RESULTS: A Phase-1 reconnaissance-level study of the Culver Studios Project, 9336 W. Washington Boulevard, Culver City, California 90232 produced no evidence of archaeological or paleontological resources. An archival search of pertinent documents on file at the CSU Fullerton South Central Coastal Information Center revealed that no prehistoric archaeological sites have been recorded within the boundaries of the subject property. However, Sanborn Fire Insurance Maps on file at the California State University, Northridge Geography Map Library indicate structures on the study parcel dating to 1919. A pedestrian ground-search survey of the tract yielded no indication of prehistoric or paleontological remains. It is therefore concluded that the development of 9336 W. Washington Boulevard, Culver City, will not adversely impact any known cultural or paleontological resources.

RECOMMENDATIONS: Nothing produced by this investigation weighs against development of the proposed Culver Studios Project, 9336 W. Washington Boulevard, Culver City, California. However, owing to the fact that excavation within the subject property might impact buried historical resources (e.g, buildings, features, and/or objects), archaeological monitoring of earthwork is recommended. The objective of construction monitoring is to ensure the appropriate treatment of cultural resources should they be encountered during subsurface excavation.

Introduction and Rationale

At the request of Hackman Capital Partners, a Phase-1 archaeological and paleontological survey and resource assessment was made of a 14-acre parcel located at 9336 W. Washington Boulevard, Culver City, California (Figure 1). Studies of the kind undertaken for Hackman Capital Partners are required as part of compliance with legal guidelines that protect cultural and paleontological resources (Appendix 1). Implementation of federal, state, and municipal laws typically is achieved in a three-phased sequence of activities: (1) Phase-1 archival research and field surveys to identify and document cultural resources; any construction that causes disturbance to the ground has the potential to cause adverse impact, if archaeological sites and/or paleontological localities are present. (2) Phase-2 test excavations and other investigations, as appropriate, to determine resource significance and assess potential effects, and (3) Phase-3 amelioration of effects through data recovery and other measures, including archaeological construction monitoring.

California's archaeological record is recognized within environmental planning/protection regulations that guarantee the consideration of cultural properties when they are threatened with damage or destruction (Meighan 1986:15). The discussion of regional prehistory in Moratto (1984) and Chartkoff and Chartkoff (1984) may help to provide an understanding of some of the major concepts that guide evaluation and treatment of archaeological resources.

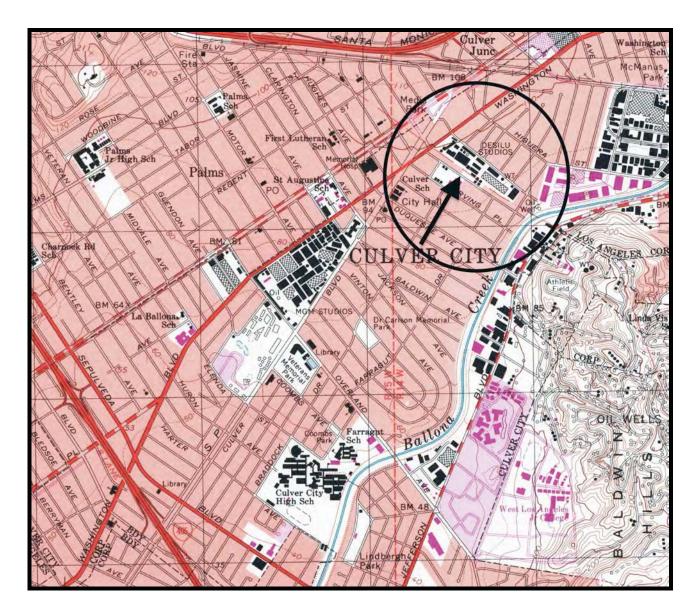


Figure 1: Portion of the USGS Beverly Hills 7.5' quadrangle map (1995) locating the Culver Studios Project, 9336 W. Washington Boulevard, Culver City, California, 90232.

Literature Search

A careful review of existing records pertaining to archaeological and historical resources was conducted at the CSU Fullerton South Central Coastal Information Center (SCCIC), State Office of Historic Preservation. To date, 21 archaeological surveys have been conducted within the general area (Appendix 2). The SCCIC regional maps showed no documentation of prehistoric archaeological sites within the boundaries of the subject parcel. However, one isolated artifact (Figure 2) was found < 1 mile southwest of the project site (Boxt 1988), and six prehistoric sites have been documented within a one-mile radius of the Culver Studios, including CA-LAN-53 (The Farragut Drive School Site), CA-LAN-55, CA-LAN-56, CA-LAN-57 (The Lindberg Park Park Site), CA-LAN-58 (The Machado Site), CA-LAN-66, and CA-LAN-68 (Farmer 1936; Rozaire and Belous 1950: 50). As well, a small collection of early twentieth century historic glass bottles was recovered during earthwork for Culver City's Town Plaza Project (Figure 3 and Figure 4) (Boxt 2003).



Figure 2: Chert biface artifact found at the Culver City Transportation Facility Project, 1988.



Figure 3. Screw top Vaseline jar. Chesebrough Mfg. Co., NY, 1908.



Figure 4. Six fluid oz. bottle, Coca Cola Company, San Diego, California, 1923.

A review of historic maps – Sanborn Insurance Company (1919, 1924, 1929, and 1954) indicated that in 1919 18 structures and a swimming pool were located on the project site, then known as the Thos. H. Ince Studios (Inc.) Motion Picture Plant (Figure 5). Currently, several buildings are eligible for the National Register of Historic Resources Inventory and five structures have been designated as Landmarks by the City of Culver City (PCR Services Corporation 2015: 72-75).



Figure 5. Portion of Sanborn Company Fire Insurance Map (1919), highlighting structures on project site. Photo courtesy CSUN Map Library.

Paleontological Resources

This section addresses the potential for paleontological discoveries within the project area. The findings herein are based on a paleontological record search completed by Dr. Samuel A. McLeod, Department of Vertebrate Paleontology, Natural History Museum of Los Angeles County (Appendix 3). Paleontological resources are physical remnants of ancient life, including fossilized bones, teeth, shells, leaves and wood; vertebrate fossils are important non-renewable paleontological resources. Importantly, no vertebrate fossil localities lie within the proposed project site boundaries. However, eight fossil localities have been identified in close proximity to the study area, highlighting the potential for additional discoveries.

Location, Survey Methods, and Conditions

Dr. Boxt examined the subject property on April 24, 2015, at which time the fieldwork was completed. Standard archaeological survey methods were employed, traversing the terrain in east/west transects. The objective of this procedure was to visually detect traces of prehistoric occupation, including lithic debris and artifacts, midden deposits, cultural features, and/or Historic-era foundations or refuse. The parcel was identified by a portion of the USGS 7.5 minute Beverly Hills 1995 topographic quadrangle sheet and by a Thomas Guide (2006:672) street map. All areas that could be reasonably expected to contain prehistoric cultural resources were thoroughly inspected. No archaeological sites or isolated artifacts were observed on any part of the proposed development zone. The subject property is landscaped and highly modified, making remote the likelihood of discovering intact archaeological resources during a Phase-1 survey.

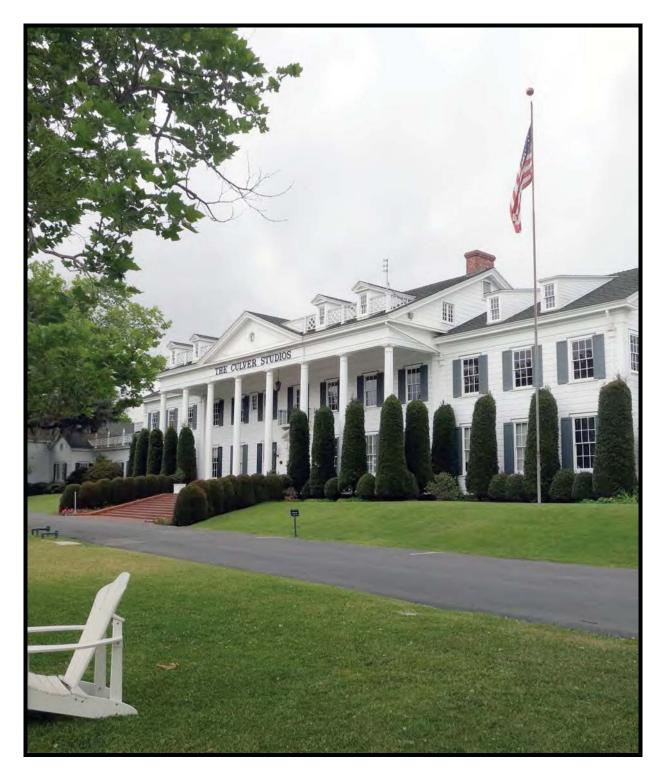


Figure 6. Landscaped areas to the north of Building C.

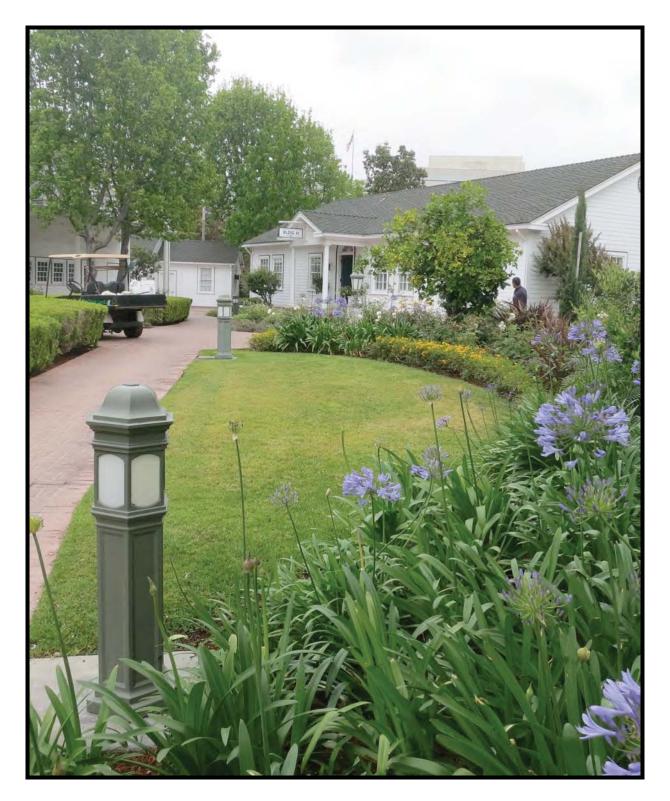


Figure 7. Building H, facing east. No cultural resources were observed during survey of landscaped areas to the south of Building C.

Conclusions and Recommendations

A search of maps, site records, and survey reports on file at State repositories revealed no known prehistoric or paleontological sites on the subject property. A careful reconnaissance of the area confirmed this observation, but because of the identification of historic structures on the property, there is some possibility that buried materials may be found in the areas of proposed construction. While Phase-1 reconnaissance-level surveys are helpful in locating archaeological sites and/or paleontological localities prior to development, it should be recognized that the nature of the study does not preclude the existence of subsurface deposits; there is a distinct possibility that cultural materials may exist in the area of proposed construction. Since it is better to err on the side of caution, I strongly recommend that an archaeological monitor be present during earth-moving activities in the construction zone, providing assurance that buried cultural resources will be identified and dealt with appropriately. As well, archaeological clearance will be granted under the stipulation that should any paleontological remains be encountered during development, all earthwork will stop in the immediate area of the finds, and that a professional vertebrate paleontologist specialist be contacted so that appropriate mitigation measures can be undertaken in order to either stabilize or salvage the remains. By following these recommendations, Hackman Capital Partners will make his best effort to safeguard fragile non-renewable archaeological resources, ensuring that an appropriate cultural resource protection plan can be put into place with minimum delay.

End Note

1. The CSU Fullerton South Central Coastal Information Center maintains the most up-to-date records for archaeological sites and resources within the County, and issues archaeological site numbers as new sites are discovered and described. These numbers then serve as the legal identifiers for prehistoric and historic sites. Hence, if any previous investigator has discovered or located archaeological sites on the subject property, documentation of this would of necessity be on file and centralized at the South Central Coastal Information Center. Furthermore, all investigations by trained archaeologists of properties such as the study parcel are recorded on the master set of USGS topographic maps for Los Angeles County, and the archival search at the South Central Coastal Information Center of a given piece of land has been inspected (Dillon 1990:4).

Bibliography

Boxt, Matthew A.

- 1988 Archaeological Monitoring Report for the Culver City Transportation Facility, 9815 Jefferson Boulevard, Culver City, California. MS #LA-4174 on file at the CSU Fullerton South Central Coastal Information Center.
- 2003 Archaeological Monitoring Statement for the Town Plaza Project, Culver City, Los Angeles County, California. Manuscript on file, Culver City Redevelopment Agency, March 3, 2003.

Chartkoff, Joseph L., and Kerry Kona Chartkoff

1984 The Archaeology of California. Stanford University Press.

Dillon, Brian D

1990 Archaeological Record Search and Impact Evaluation for the Los Angeles Wastewater Program Management (NOS-NCOS) Project, Los Angeles California. MS #L-3501 on file at the at the CSU Fullerton South Central Coastal Information Center.

Meighan, Clement W.

1986 Archaeology for Money. Wormwood Press. Calabasas, California.

Moratto, Michael J.

1984 California Archaeology. Academic Press, Orlando, Florida.

PCR Services Corporation

2015 Historical Resources Assessment and Environmental Impacts Analysis Report: The Culver Studios, 9336 West Washington Boulevard, Culver City, California. Manuscript on file, Hackman Capital Partners, February 2015.

The Thomas Guide.

2005 Los Angeles County Street Guide. Rand McNally & Company. Chicago, Illinois.

Appendix 1: Summary of California State and Federal Laws and Regulations Protecting Archaeological Resources

CALIFORNIA

California Environmental Quality Act ("CEQA") (13 Public Resources Code, Section 21000)

Requires that all private and public activities not specifically exempted be evaluated for potential damage to the environment, including effects to historical resources. Defines historical resources as "any object, building, structure, site, area, or place which is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California" (Division I, Public Resources Code, Section 5O21.1(b)). Section 21083.2(j) defines significance for purposes of significance determinations.

Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines; 14 California Administrative Code, Section 1500 *et seq.*)

Developed by the Governor's Office of Planning and Research for the Secretary of Resources, The CEQA Guidelines detail the practical application of CEQA. Appendix K deals specifically with archaeological resources.

Health and Safety Code, Section 7052 (Stats. 1039, C.60:672)

Establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

Penal Code, Section 622.5 (Stats. 1939, C.90:1605, 5.1)

Provides misdemeanor penalties for injuring or destroying objects of historical or archaeological interest located on public or private lands. Specifically excludes the landowner.

Public Resources Code, Section 5097.5 (Stats. 1965, C.11362792)

Defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historical or paleontological resources located on public lands.

Health and Safety Code, Ch. 1492 (SB 297)

Requires the Governor's Native American Heritage Commission be consulted whenever Native American graves are found. Makes it illegal to possess remains or artifacts taken from Native American graves.

Public Resources Code, Sec. 5024 and 5024.5

Requires State Government agencies to inventory and protect historical structures and objects under their jurisdiction. The State Historic Preservation Officer must be consulted before any such structure or object is altered or sold.

Public Resources Code, Section 6313, Chapter 1083 (SB 2199)

Requires the State Lands Commission (which has jurisdiction over state waters) to forward to the State Historic Preservation Officer all applications for permits to salvage or excavate submerged archaeological resources. Such permits may be revoked by the State Lands Commission or by recommendation of the State Historic Preservation Officer.

Public Resources Code, Section 5097.99, Chapter 404 (SB 447)

Makes it a felony to obtain or possess Native American remains or associated grave goods.

FEDERAL

Antiquities Act of 1906, 16 USC, Sections 431-433 (1982)

This act authorizes the President to designate as National Monuments historic and natural resources of national significance located on federally owned or controlled lands. The act further provides for the protection of all historic and prehistoric ruins and objects of antiquity located on Federal lands by providing criminal sanctions against excavation, injury, or destruction of such antiquities without the permission of the Department having jurisdiction over such resources. The Secretaries of the Interior, Agriculture, and Defense are further authorized to issue permits for archeological investigations on lands under their control to recognized educational and scientific institutions for the purpose of systematically and professionally gathering data of scientific value.

Historic Sites Act of 1935, 16 USC, Sections 461-467 (1982)

This act establishes as national policy the preservation for public use of historic resources by giving the Secretary of the Interior the power to make historic surveys and to document, evaluate, acquire, and preserve archeological and historic sites across the country. The act led to the eventual establishment within the National Park Service of the Historic Sites Survey, the Historic Buildings Survey, and the Historic Sites Engineering Record.

National Historic Preservation Act of 1966 16 USC, ss. 470-470w-6 (1982)

The NHPA expresses a general policy of supporting and encouraging the preservation of prehistoric and historic resources for present and future generations by directing Federal agencies to assume responsibility for considering historic resources in their activities. The statute ensures the accomplishment of its policies and mandates by several means.

First, the act authorizes the Secretary of the Interior to maintain and expand a National Register of Historic Places and establishes procedures for nomination of properties to the Register.

Second, the act directs the Secretary of the Interior to approve State preservation programs that provide for the designation of a State Historic Preservation Officer (SHPO) to administer State preservation programs, a State Historic Preservation Review Board, and adequate public participation in the State program. Many states have established a process for certifying local governments to carry out preservation activities.

Third, the act authorizes a grant program that provides funds to the States for historic preservation projects and to individuals for the preservation of properties and to individuals for the preservation of properties listed in the National Register.

Fourth, the statute establishes the Advisory Council on Historic Preservation as an independent Federal agency. The act directs the Council to advise the President, Congress, and other Federal agencies on historic preservation matters, conduct training and other educational programs, and encourage public interest in preservation.

The Council is also responsible for implementation of Section 106 of NHPA. Section 106 requires Federal agencies to take into account the effect of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on the undertakings prior to licensing or approving the expenditure of funds on any undertaking that may affect properties listed in or eligible for listing in the National Register. To effectively administer these requests under the authority given it by Congress, the Council has issued regulations to govern agencies in their compliance with Section 106.

Fifth, the act establishes procedures that Federal agencies must follow in managing federally owned or controlled property and requires that, prior to the approval of any Federal undertaking that may directly and adversely affect any National Register Landmark or site eligible to the National Register, agencies must undertake such planning and action as may be necessary to minimize harm to the landmark and must obtain the comments of the Council.

Finally, the act establishes a National Historic Preservation Fund.

Executive Order No. 11503, "Protection and Enhancement of the Cultural Environment," 3 CFR 154 (1971), reprinted in 16 USC, ss. 47O, note (1982)

This executive order directs Federal agencies to take a leadership role in preserving, restoring, and maintaining the historic and cultural environment of the Nation. Federal agencies must locate, inventory, and nominate to the National Register all historic resources under their jurisdiction or control. Until these processes are completed, agency heads must exercise caution to ensure that potentially qualified Federal property is not inadvertently transferred, sold, demolished, or substantially altered. When planning projects, agencies are urged to request the opinion of the Secretary of the Interior as to the eligibility for National Register listing of properties whose resource value is questionable or has not been inventoried. Agencies are

directed to institute procedures, in consultation with the President's Advisory Council on Historic Preservation, to ensure that Federal plans and programs contribute to the preservation and enhancement of non-federally owned historic resources.

Archaeological Resources Protection Act of 1979, 16 USC, ss. 470aa-47011 (1982)

This act requires a permit of any excavation or removal of archaeological resources from public lands or Indian lands. Excavations must be undertaken for the purpose of furthering archaeological knowledge in the public interest, and resources must remain the property of the United States. The act provides both civil and criminal penalties for violation of the permit requirements. Consent must be obtained the Indian tribes owning lands on which the resource is located prior to issuance of a permit, and the permit must contain any terms or conditions requested by the tribe.

Native American Religious Freedom Act of 1978 (P.L. 95-341; 92 Stat. 470)

Requires Federal agencies to allow access to Federal lands and objects used in the practice of established Native American religious ceremonies.

Appendix 2: Inventory of Archaeological Surveys Reported Within a One-Mile Radius of the Culver Studios Project

ITEMID: LA190 DATE: 1981 PAGES: 3 AUTHOR: Singer, Clay A. FIRM: NORTHRIDGE Archaeological RESEARCH CENTER TITLE: Archaeological RECONNAISSANCE of THE PROPOSED JACKSON AVENUE CHLORINATION FACILUTY, 10121 JEFFERSON BOULEVARD, CULVER CITY. N.A.R.C. PROJECT #VS-590. AREA: SITES: none QUADNAME: Beverly Hills MEMO: **ITEMID: LA2632 DATE: 1992** PAGES: 9 AUTHOR: Demcak, Carol R. FIRM: ARMC TITLE: Cultural ResourceS Assessment of THE 67-ACRE VISTA PACIFICA PROJECT AREA, CITIES OF CULVER CITY AND LOS ANGELES (BEVERLY HILLS QUAD), LOS ANGELES COUNTY, CALIFORNIA AREA: SITES: none QUADNAME: BEVERLY HILLS MEMO: **ITEMID: LA2649** DATE: 1989 PAGES: 35 **AUTHOR:** Anonymous FIRM: MITECH TITLE: HISTORIC PROPERTIES OVERVIEW FOR ROUTINE OPERATIONS and MAINTENANCE, LOS ANGELES COUNTY DRAINAGE AREA (LACDA) AREA: 43 li mi SITES: CA-LAN-53, LAN-57, LAN-68, LAN-111, LAN-345, LAN 167, LAN-300, LAN-858, LAN-1009, LAN-1311\H, LAN 1368\H QUADNAME: AZUSA **BEVERLY HILLS** MEMO:

ITEMID: LA	309	DATE: 1987	PAGES:	17
AUTHOR:	Wlodarski, Robert J.			
FIRM:	H.E.A.R.T.			
TITLE:	Archaeological RECONN	NAISSANCE REPORT FOR AREA	S RELATI	NG TO THE
	NORTH OUTFALL REP	PLACEMENT SEWER PROJECT,	LOS ANGE	LES COUNTY, CALIFORNIA.
AREA:	5 li mi			
SITES:	none			
QUADNAME:	Hollywood			
	Beverly Hills			
MEMO.				

MEMO:

ITEMID: LA3357

DATE: 1996

PAGES: 21

AUTHOR: Wlodarski, Robert J.

FIRM: H.E.A.R.T.

TITLE: ADDENDUM REPORT: RESULTS of A Phase 1 Archaeological STUDY of THE PROPOSED CONSTRUCTION of PROPOSED SHAFT SITE P EAST CENTRAL INTERCEPTOR SEWER PROJECT, EAST-WEST ALIGNMENT, LOS ANGELES COUNTY, CALIFORNIA

AREA: 2.5 ac

SITES: none

QUADNAME: BEVERLY HILLS

MEMO:

ITEMID: LA3	3501	DATE: 199	00	PAGES:	67
AUTHOR: FIRM;	Dillon, Brian D.				
TITLE:	Archaeologica Record Management (NOS-N			os Angeles	Wastewater Program
AREA:	57,600 ac				
SITES:	19-000053,19-000055 000070,19-000071,19 001399,19-000159,19 19-000067	-000072,19-00007	73,19-000074,19-0000	80,19-000	171,19-000172,19-0001336,19-
QUADNAME:	Los Angeles, Pasadena	,Venice,Beverly I	Hills,Burbank,Hollywo	od,Inglewo	bod

MEMO:

 ITEMID: LA3583
 DATE: 1974
 PAGES: 200

 AUTHOR:
 Bucknam, Bonnie M.
 FIRM: California State University, Long Beach

 TITLE:
 The Los Angeles Basin and Vicinity: A Gazetteer and Compilation of Archaeological Site Information

 AREA:
 Unknown

 SITES:
 Vicinity

QUADNAME: Triunfo Pass,Point Dume,Malibu Beach,Topanga,Beverly Hills,Venice,Redondo Beach,Hollywood,Ingle MEMO: Sites too numerous to enter. Sites are mapped.

ITEMID: L	A3600	DATE:	1997	PAGES:	7
AUTHO	R: Maki, Mary M.				
FIRM	M: ENSR				
TITL	E: Phase I Archaeological S California	Survey of 2	Acres at 4095 Overland	Avenue Cul	ver City, Los Angeles County,
ARE	A: 2 ac				
SITE	S: none				
QUADNAME	2: Beverly Hills				
MEMO	0:				

PAGES: 7

ITEMID: LA3	B667 DATE: 1997
AUTHOR:	Anonymous
FIRM:	
TITLE:	Culver City Senior Center Construction Project/#D97195-97
AREA:	2 ac
SITES:	

QUADNAME: MEMO:

 ITEMID: LA3673
 DATE: 1987
 PAGES: 77

 AUTHOR: Anonymous
 FIRM: Myra L. Frank & Associates
 TITLE: Historic Property Survey Report North Outfall Relief Sewer (NORS)

 AREA: Unknown
 SITES: None

QUADNAME: Beverly Hills, Inglewood, Venice, Hollywood MEMO:

 ITEMID: LA3746
 DATE: 1977
 PAGES: 8

 AUTHOR: Anonymous
 FIRM: Department of Public Works

 FIRM: Department of Public Works
 TITLE: Historic Property Survey Overland Avenue Between National Place and Washington Boulevard

 AREA: 4000 ft
 SITES: none

QUADNAME: Beverly Hills MEMO:

 ITEMID: LA3748
 DATE: 1977
 PAGES: 10

 AUTHOR: Anonymous
 FIRM: Department of Public Works
 TITLE: Historic Property Survey National Boulevard Between Palms Boulevard and Rose Avenue W.O. 91336

 AREA: 3350 ft
 SITES: none

QUADNAME: Beverly Hills MEMO:

ITEMID: LAS	3966	DATE:	1998	PAGES:	20
AUTHOR:	McLean, Deborah				
FIRM:	LSA				
TITLE:	Archaeological Asses 8951 National Boulev	ment for Pacia ard, City and	fic Bell Mobil County of Lo	le Services Telecommu os Angeles, California	nications Facility LA 024-04,
AREA:					
SITES:	none				
QUADNAME:	Beverly Hills				
MEMO:					
×.					
and the second					
ITEMID: LA4		DATE:	1998	PAGES:	51
	Boxt, Matthew A.				
FIRM:					al and the second
	Boulevard, Culver Cit		for the Culver	City Transportation Fa	cility Project, 9815 Jefferson
	3078 sq m				
SITES:	19-100249				
QUADNAME:	Beverly Hills				
MEMO:					
ITEMID: LA4	569	DATE:	1999	PAGES:	9
AUTHOR:	Duke, Curt				
FIRM:	LSA Associates				
TITLE:	Cultural Resource Ass Angeles, California	sessment for P	acific Bell M	obile Services Facility I	LA 581-02, County of Los
	A REAL PROPERTY OF A READ REAL PROPERTY OF A REAL P				

AREA: < 1ac

SITES: none

QUADNAME: Beverly Hills

MEMO:

ITEMID: LA4570 DATE: 1999 PAGES: 8 AUTHOR: Duke, Curt FIRM: LSA Associates TITLE: Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 614-13, County of Los Angeles, California AREA: < 1ac SITES: none QUADNAME: Beverly Hills MEMO:

ITEMID: LA	4667	DATE: 1999	PAGES:	34
AUTHOR:	Foster, John			
FIRM:	Greenwood and Assoc	iates		
TITLE:	Historic Resource Evaluation Angeles County, California		Boulevard Right-of-Wa	ny Regional Bikeway Project Los
AREA:	2 li mi			
SITES:	None			
QUADNAME: MEMO:	Hollywood, Beverly Hills			

ITEMID: LAS	37 I	DATE:	1979	PAGES:	7	
AUTHOR:	Whitley, David					
FIRM:	Ancient Enterprises, Inc					
TITLE:	Cultural ResourceS Assessm	ent of 7	THE PROPOSED CU	LVER City		
	PARK					
AREA:						
SITES:	none					
QUADNAME:	Beverly Hills					
MEMO:						

ITEMID: LAT	751	DATE:	1950	PAGES:	106
AUTHOR:	Belous, Russell E., and C	Charles E. F	Rozaire		
FIRM:					
TITLE:	PRELIMINARY REPOR	RT ON THE	E ARCHEOI	LOGY of THE LA BAL	LONA CREEK
	AREA, LOS ANGELES	COUNTY			
AREA:					
SITES:	CA-LAN-55, LAN-56, L	AN-57, LA	AN-58, LAN	-68, LAN-69,	
	CA-LAN-70, LAN-71, L	AN-72, LA	AN-73, LAN	-74, LAN-171,	
	CA-LAN-172, LAN-53,	LAN-59, L	AN-60, LA1	N-61, LAN-62,	
	CA-LAN-63, LAN-64, L	AN-65, LA	AN-66, LAN	-67	
and the second se	Beverly Hills, Venic				
MEMO:					
ITEMID: LA9	8	DATE:	1975	PAGES:	9
AUTHOR:	Clewlow, C. William, Jr.				
FIRM:	UCLA Archaeologica	al SURV	EY		
TITLE:	Evaluation of THE Arche	eological R	esourceS and	POTENTIAL	
	IMPACT OF THE DEVE	-			REGIONAL PARK
AREA:					
SITES:	none				
QUADNAME:	HOLLYWOOD				
	INGLEWOOD				
MEMO:					
		DITT	1077	PAGES:	14
ITEMID: LA		DATE:	1977	PAGES:	14
	Romani, John F.		1.0	The second s	
	Northridge Archaeol				West Factor Disc WO
TITLE:	Assessment of the Archa 31389	eological l	Impact by the	e Development of the W	aste Water Facilities Plan W.O
	unknown				
SITES:	19-000055,19-000053,1	9-000056,1	19-000057,19 000062,19-0	9-000058,19-000068,19 0061,19-000211,19-000	-0000204,19-000203,19- 212,19-000009,19-000343,19-

000206,1

19-000053,19-000053,19-000053,19-000057,19-000058,19-000058,19-0000204,19-000205,19-0000204,19-0000205,19-000054,19-000055,19-000055,19-000057,19-000057,19-000058,19-0000058,19-000058,19-000058,19-000058,19-000058,19-000058,19-000058,190

QUADNAME: Beverly Hills, Hollywood

Van Nuys, Venice

MEMO: Indexed. No specific location map provided. Sites mapped.

Appendix 3: Paleontological Resources for the Proposed Culver Studios Project in Culver City, Los Angeles County, California



Vertebrate Paleontology Section Telephone: (213) 763-3325 Fax: (213) 746-7431 e-mail: smcleod@nhm.org

13 April 2015

Matthew A. Boxt 2043 South Dunsmuir Avenue Los Angeles, CA 90232

Attn: Dr. Matthew A. Boxt, Archaeologist

re: Paleontological resources for the proposed Culver Studios project, in Culver City, Los Angeles County, project area

Dear Matthew:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for the proposed Culver Studios project, in Culver City, Los Angeles County, project area as outlined on the portion of the Beverly Hills USGS topographic quadrangle map that you sent to me via e-mail on 17 March 2015. We do not have any vertebrate fossil localities that lie directly within the proposed project area boundaries, but we do have localities nearby from the same or similar sedimentary deposits as occur in the proposed project area.

The entire proposed project area contains surficial deposits of younger Quaternary Alluvium, derived as fluvial deposits from the Ballona Creek that flows immediately to the southeast. These deposits typically do not contain significant vertebrate fossils, at least in the uppermost layers, but at relatively shallow depth in this area older Quaternary sediments that do contain significant fossil vertebrate materials are likely to be encountered. Our closest fossil vertebrate localities are in sediments around Ballona Creek where we have locality LACM 3368, just east-northeast of the proposed project area near the intersection of Jefferson Boulevard and Sentous Avenue, that contained a specimen of fossil horse, Equus, at unknown depth, and locality LACM 4250, north of locality LACM 3368 east-northeast of the proposed project area just south of Washington Boulevard and west of La Cienega Boulevard, where remains of fossil mammoth, Mammuthus, were collected at unknown depth. Our next closest locality in these deposits is LACM 4232, due east of the proposed project area near the intersection of La Cienega Boulevard with Rodeo Road, where remains of fossil human, Homo sapiens, recovered from a depth of 12-13 feet below the surface. We have a number of additional fossil vertebrate localities due east of the proposed project area, along the Southern Pacific Railway and Rodeo Road between Crenshaw Boulevard and Ballona Creek, that were collected in the 1920's during excavations for the Outfall Sewer in the area. Although shallow, most of these localities did not record

the depth at which specimens were recovered. These localities include LACM 1159 that contained fossil human, Homo sapiens, at a depth of 19-23 feet, LACM 3366 with fossil camel, Camelops at unknown depth, LACM 3367 with fossil mastodon, Mammut, at unknown depth, LACM 3369 with fossil horse, Equus, at a depth of only six feet below the surface, LACM 3370 with fossil sabretooth cat, Smilodon, at unknown depth.

The uppermost few feet of soil and younger Quaternary Alluvium in the proposed project area are unlikely to contain significant fossil vertebrate remains, especially if they have been disturbed by prior construction activities. At depth, however, there is an very good chance of encountering significant vertebrate fossils, possibly even including human remains, as nearby localities have produced vertebrate fossils at depths as shallow as six feet. Any substantial excavations in the proposed project area, therefore, should be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential onsite survey.

Sincerely,

Summel a. Mi Leod

Samuel A. McLeod, Ph.D. Vertebrate Paleontology

APPENDIX D-3

Sacred Lands File Search and Native American Consultation Documentation



626 Wilshire Boulevard Suite 1100 Los Angeles, CA 90017 213.599.4300 phone 213.599.4301 fax

February 1, 2017

Native American Heritage Commission 1550 Harbor Blvd., Suite 100 Sacramento, CA 95691

Subject: Sacred Lands File Search and Native American Contact List Request: Proposed Culver Studios Innovation Plan Project, Culver City, California.

Dear Native American Heritage Commission Representative:

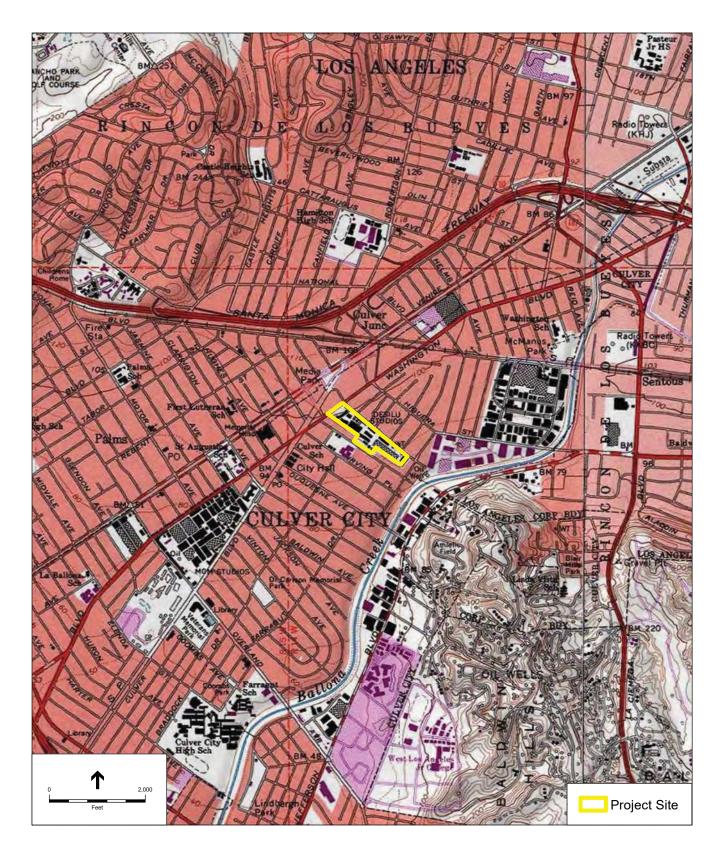
ESA is preparing environmental documentation for the proposed Culver Studios Innovation Plan Project (the "Project") located at 9336 Washington Boulevard, Culver City, California (the "Project Site"). The Project proposes to technologically update and expand the facilities within the existing 14.3-acre Studio Campus, while retaining the Studio's unique ambiance and prominent place in the community. Proposed improvements would consist of flexible and sustainable new media space, adaptive reuse and reinvigoration of the most prominent buildings, inviting and collaborative landscaped open areas, sensitive treatment of neighborhood interfaces, and redesigned and improved access.

To ensure that any areas containing previously recorded cultural resources and sacred lands are identified and considered, ESA is requesting a Sacred Lands File search of the Project Site and a Native American Contact List. The Project Site is located in an un-sectioned area of Township 2 South, Range 14 West of the Beverly Hills, CA United States Geological Survey 7.5' topographic quadrangle map (**Figure X**, Records Search Map, attached).

Thank you for your assistance with our efforts to address possible Native American concerns that may be affected by the proposed project. If you have any questions or need additional information, please contact me at (949) 773-7001 or via email at fclark@esassoc.com.

Sincerely,

Fatima Clark Archaeologist



SOURCE: USGS 7.5' Topo Quad Beverly Hills 1978, 1981; Hollywood 1978, 1982

The Culver Studios Innovation Plan
 Figure 1
 Record Search



STATE OF CALIFORNIA

NATIVE AMERICAN HERITAGE COMMISSION 1550 Harbor Blvd., Sulte 100 West Sacramento, CA 95691 (916) 373-3710 (916) 373-5471 FAX



February 6, 2017

Fatima Clark ESA

Sent by E-mail: fclark@esassoc.com

Dear Ms. Clark:

Attached is a contact list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties. <u>A search of the SFL was completed for the USGS guadrangle information provided with negative results.</u>

Our records indicate that the lead agency for this project has not requested a Native American Consultation List for the purposes of formal consultation. Lists for cultural resource assessments are different than consultation lists. Please note that the intent of the referenced codes below is to avoid or mitigate impacts to tribal cultural resources, as defined, for California Environmental Quality Act (CEQA) projects under AB-52.

As of July 1, 2015, Public Resources Code Sections 21080.3.1 and 21080.3.2 **require public** agencies to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose mitigating impacts to tribal cultural resources:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section. (Public Resources Code Section 21080.3.1(d))

The law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions. The NAHC believes that in fact that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

In accordance with Public Resources Code Section 21080.3.1(d), formal notification must include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The NAHC believes that agencies should also include with their notification letters information regarding any cultural resources assessment that has been completed on the APE, such as:

- 1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
 - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
 - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and

RE: Proposed Culver Studios Innovation Plan Project, City of Culver City; Beverly Hills USGS Quadrangle, Los Angeles County, California

- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.
- 2. The results of any archaeological inventory survey that was conducted, including:
 - Any report that may contain site forms, site significance, and suggested mitigation measurers.
 - All information regarding site locations, Native American human remains, and associated funerary
 objects should be in a separate confidential addendum, and not be made available for pubic disclosure
 in accordance with Government Code Section 6254.10.
- The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission.
- 4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
- 5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the case that they do, having the information beforehand well help to facilitate the consultation process.

The results of these searches and surveys should be included in the "Tribal Cultural Resources" section or in a separate subsection of the Cultural Resources section of the environmental document submitted for review. Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <u>http://resources.ca.gov/cega/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf</u>.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD. Associate Governmental Program Analyst

Native American Heritage Commission Tribal Contact List Los Angeles County 2/6/2017

Fernandeno Tataviam Band of

Mission Indians Kimia Fatehi, 1019 Second Street, Suite 1 San Fernando, CA, 91340 Phone: (818) 837 - 0794 Fax: (818) 837-0796 kfatehi@tataviam-nsn.us

Tataviam

Fernandeno Tatavlam Band of

Mission Indians Alan Salazar, 229 Ute Lane Ventura, CA, 93001 Phone: (805) 423 - 0091

Tataviam

Fernandeno Tataviam Band of Mission Indians

Beverly Salazar, Councilmember 1931 Shady Brooks Drive Tataviam Thousand Oaks, CA, 91362 Phone: (805) 558 - 1154

Gabrieleno Band of Mission

Indians - Kizh Nation Andrew Salas, Chariperson P.O. Box 393 Covina, CA, 91723 Phone: (626) 926 - 4131 gabrielenoindians@yahoo.com

Gabrieleno/Tongva San Gabriel

Band of Mission IndiansAnthony Morales, ChairpersonP.O. Box 693GabrielenoSan Gabriel, CA, 91778Phone: (626)483-3564Fax: (626)286-1262GTTribalcouncil@aol.com

GabrielIno /Tongva Nation

Sandonne Goad, Chairperson 106 1/2 Judge John Aiso St., Gabrielino #231 Los Angeles, CA, 90012 Phone: (951)807-0479 sgoad@gabrielino-tongva.com

Gabrielino Tongva Indians of

California Tribal Council Robert Dorame, Chairperson P.O. Box 490 Bellflower, CA, 90707 Phone: (562) 761 - 6417 Fax: (562) 761-6417 gtongva@gmail.com

Gabrielino

Gabrlelino-Tongva Tribe

Linda Candelaria, Co-Chairperson 1999 Avenue of the Stars, Suite Gabrielino 1100 Los Angeles, CA, 90067 Phone: (626)676-1184

San Fernando Band of Mission Indians

John Valenzuela, Chairperson P.O. Box 221838 Newhall, CA, 91322 Phone: (760)885-0955 tsen2u@hotmail.com

Kitanemuk Serrano Tataviam

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code,

This list is only applicable for contacting local Native Americans with regard to cultural rasources assessment for the proposed Culver Studios Innovation Plan, Comprehensive Plan Amendment No. 7 Project, Los Angeles County.

PROJ-2016-007918





(310) 253-5710 FAX (310) 253-5721

PLANNING DIVISION 9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

November 17, 2016

Project Title: The Culver Studios Innovation Plan - Comprehensive Plan Amendment No. 7

Dear Tribal Representative:

Re: AB 52 Project Notification for the proposed Culver Studios Innovation Plan Project

This letter is to inform you that the City of Culver City Planning Division (City) is preparing an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA) for the proposed Culver Studios Innovation Plan – Comprehensive Plan Amendment No. 7 (Project).

The Project proposes to technologically update and expand facilities within the existing 14.3-acre Studio Campus, while retaining the Studio's unique ambiance and prominent place in the community. No major exterior changes are proposed to the Mansion or adjacent Buildings D, E, H, and I under the Innovation Plan. Interior rehabilitation of the Mansion would be undertaken in a manner that would protect the building's eligibility as a historical resource under the City's preservation ordinance. Proposed improvements include the construction of five New Media buildings consisting of a flexible mix of creative space, production space, and digital media stages. The New Media buildings would replace six existing buildings consisting of offices and support services and four existing buildings consisting of sound stages, which would be demolished. Existing Stages 11/12/14 and Stages 15/16, all of which are contained in a single interconnected building in the southwestern portion of the Studio Campus, would remain in place for continued use. The buildings consisting of Stages 2/3/4, Stages 5/6. Stages 7/8/9, and Stage 10 would be demolished. Eight new digital media stages would be provided within the Central Area of the Studio Campus, co-located with media office and support uses. Buildings to be demolished would total approximately 236,293 square feet and new construction at Project buildout would total approximately 649,420 square feet, for a net new square footage total of approximately 413,127 square feet Campus-wide. Two new parking structures are also proposed, a two level below grade structure with 836 parking spaces and an eight level structure with 1,109 spaces and two levels below grade. Construction is anticipated to start in the first quarter of 2018, provided Project entitlement approvals. The anticipated Project completion date is mid-2020.

Per AB 52, you have the right to consult on the proposed project prior to the release of the EIR. You have 30 calendar days from receipt of this letter to notify us in writing that you wish to consult on this project. Please provide your contact information and mail your request to:

City of Culver City, Planning Division ATTN: Susan Yun, Senior Planner 9770 Culver Boulevard Culver City, CA 90232 Email: <u>susan.yun@culvercity.org</u> Phone No: (310) 253-5755

Thank you for your assistance with our efforts to address tribal cultural resources that may be affected by the proposed project.

Sincerely,

Susan Yun

Susan Yun V Senior Planner

Joseph Ontiveros Cultural Resource Director Soboba Band of Luiseno Indians PO Box 487, San Jacinto, CA 92581

Sam Dunlap, Tribal Secretary Gabrielino-Tongva Nation PO Box 86908, Los Angeles, CA 90086

Linda Candelaria Gabrielino-Tongva Tribe 1875 Century Park East, Ste 1500, Los Angeles, CA 90067 Carol Roland – State Historic Preservation Officer Office of Historic Preservation 1725 23rd Street, Suite 100, Sacramento, CA 95816

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Andrew Salas, Chairman Gabrieleno Band of Mission Indians - Kizh Nation PO Box 393, Covina, CA 91723

Anthony Morales, Chairperson Gabrielino-Tongva San Gabriel Band of Mission Indians PO Box 693<u>,</u> San Gabriel, CA 91778

Linda Candelaria, Co-Chairperson Gabrielino-Tongva Tribe P.O. Box 180, Bonsall, CA 92003 Program Analyst/IGR-CEQA Native American Heritage Commission 1550 Habor Blvd,. Suite 1000, West Sacramento, CA 95691

Robert Dorame, Tribal Chair Gabrielino-Tongva Indians of California Tribal Council PO Box 490, Bellflower, CA 90707

Bernie Acuna Gabrielino-Tongva Tribe 1875 Century Park East, Ste 1500, Los Angeles, CA 90067

Ron Andrade, Director Los Angeles City/County Native American Indian Commission 3175 W. 6th Street, Room 403, Los Angeles,, CA 90020



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Susan Yun Senior Planner

RE: AB52 consultation response for AB 52 Project Notification for the proposed Culver Studios Innovation Plan Project

Dear Susan Yun,

Dec 5, 2016

Please find this letter in response to your request for consultation dated Nov 17, 2016. I have reviewed the project site and do have concerns for cultural resources. Your project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleño's villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods. The homeland of the Kizh Gabrieleño was probably the most influential Native American group in aboriginal southern California (Bean and Smith 1978a:538), was centered in the Los Angeles Basin, and reached as far east as the San Bernardino-Riverside area. The homeland of our neighbors the Serranos was primarily the San Bernardino Mountains, including the slopes and lowlands on the north and south flanks. Whatever the linguistic affiliation, Native Americans in and around the project area exhibited similar organization and resource procurement strategies. Villages were based on clan or lineage groups. Their home/ base sites are marked by midden deposits often with bedrock mortars. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies of ten left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the locations of the resources.

Due to the project location and the high sensitivity of the area location, we would like to request one of our certified Native American Monitor to be on site during any and all ground disturbances (including but not limited to pavement removal, post holing, auguring, boring, grading, excavation and trenching) to protect any cultural resources which may be effected during construction or development. In all cases, when the Native American Heritage Commission states there are "no records of sacred sites in the project area" the NAHC will always refer lead agencies to the respective Native American Tribe because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & Tribal Historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. While the property may be located in an area that has been previously developed, numerous examples can be shared to show that there still is a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities. Please note, if they haven't been listed with the NAHC, it doesn't mean that they aren't there. Not everyone reports what they know.

The recent implementation of AB52 dictates that lead agencies consult with Native American Tribes who can prove and document traditional and cultural affiliation with the area of said project in order to protect cultural resources. However, our tribe is connected Ancestrally to this project location area, what does Ancestrally or Ancestral mean? The people who were in your family in past times, Of, belonging to, inherited from, or denoting an ancestor or ancestors <u>http://www.thefreedictionary.com/ancestral</u>. Our priorities are to avoid and protect without delay or conflicts – to consult with you to avoid unnecessary destruction of cultural and biological resources, but also to protect what resources still exist at the project site for the benefit and education of future generations. At your convenience we can Consultation either by Phone or Face to face. Thank you

CC: NAHC

With respect,

Andrew Salas, Chairman cell (626)926-4131

Andrew Salas, Chairman Albert Perez, treasurer I Nadine Salas, Vice-Chairman Martha Gonzalez Lemos, treasurer II Christina Swindall Martinez, secretary Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com





PLANNING DIVISION

(310) 253-5710

FAX (310) 253-5721 planning@culvercity.org

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

September 19, 2017

Mr. Andrew Salas, Chairman Gabrieleno Band of Mission Indians - Kizh Nation PO Box 393 Covina, CA 91723

Subject: AB 52 Tribal Consultation Conclusion for the Proposed Culver Studios Innovation Plan Project – Comprehensive Plan Amendment No. 7, Located at 9336 Washington Boulevard, Culver City, California 90232

Dear Mr. Salas:

This letter is to inform you that the City of Culver City Planning Division (City) has initiated and concluded consultation with the Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleño) for the above-referenced Project. In summary, initial request to consult letters were submitted by the City to Native American contacts, including the Gabrieleño, on September 16, 2016. The Garbrieleño responded with a letter dated December 5, 2016 in which Mr. Salas indicated that he had concerns for cultural resources as the "project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleños villages adjoined and overlapped with each other." Mr. Salas also mentioned that due to the Project's location and the "high sensitivity of the area location", they requested Native American monitoring during ground disturbing activities at the Project. The City subsequently drafted mitigation measure MM-ARCH-2 which includes provisions for the Applicant to retain a Native American representative to monitor construction excavations associated with implementing the Project. On September 5, 2017, Mr. Salas approved MM-ARCH-2 and this measure has been included in the Draft Environmental Impact Report for the Project.

As a result of the City's consultation efforts, no known tribal cultural resources pursuant to Public Resources Code 21074 have been identified within the Project Site or immediate vicinity.

Mr. Andrew Salas-The Culver Studios – CPA No. 7 Page 2 of 2 September 19, 2017

Please contact the City within 15 days of receipt of this letter if you have any comments regarding the results of the consultation between the City and the Gabrieleño. Thank you for your assistance with our efforts to identify tribal cultural resources that may be impacted by the proposed Project.

Sincerely,

al.

Michael Allen, Planning Manager City of Culver City

Copy: Susan Yun, Senior Planner Case File