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IV. Environmental Impact Analysis

J.1 Cultural Resources - Historic Resources

1. Introduction

This section describes the impacts the proposed Project may have on historic resources. The following discussion of historic resources is based on information contained in the *Historic Resource Technical Report: NBC Universal Evolution Plan*, prepared by Historic Resources Group, LLC. The Historic Resources Technical Report, which is incorporated herein by this reference, is included in its entirety as Appendix L-1 to this Draft EIR.

2. Environmental Setting

Generally, a lead agency must consider a property a historic resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register of Historic Places (National Register). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historic resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant. The National and California Register designation programs are discussed below.

a. Regulatory Setting

(1) National Register of Historic Places

The National Register is "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to

indicate what properties should be considered for protection from destruction or impairment."²⁸⁰

(a) Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet at least one of four established criteria:²⁸¹

- Associated with events that have made a significant contribution to the broad patterns of our history; or
- Associated with the lives of persons significant in our past; or
- Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- Yield, or may be likely to yield, information important in prehistory or history.

(b) Physical Integrity

According to National Register Bulletin 15, "[t]o be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity." Integrity is defined as "the ability of a property to convey its significance." Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity. They are feeling, association, workmanship, location, design, setting, and materials.²⁸²

²⁸⁰ 36 Code of Federal Regulations, Part 60.2.

²⁸¹ 36 Code of Federal Regulations, Part 60.4.

²⁸² National Register Bulletin 15. *How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997.

(c) Context

To be eligible for listing in the National Register, a property must be significant within a historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific... property or site is understood and its meaning... is made clear.”²⁸³ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(d) Period of Significance

To be eligible for listing in the National Register, a property must be historically or architecturally significant within a specific period of time. The National Register defines the “period of significance” as “the length of time when a property was associated with important events, activities, or persons, or attained the characteristics which qualify it for National Register listing.”²⁸⁴ Period of significance usually begins with the date when significant activities or events began giving the property its historic significance; this is often a date of construction. National Register Bulletin 15 provides guidelines for selecting and evaluating the periods of significance relevant to each Criterion:

- *Criterion A:* For the site of an important event, the period of significance is the time when the event occurred. For properties associated with historic trends, such as commercial development, the period of significance is the span of time when the property actively contributed to the trend.
- *Criterion B:* The period of significance for a property significant for Criterion B is usually the length of time the property was associated with the important person.
- *Criterion C:* For architecturally significant properties, the period of significance is the date of construction and/or the dates of any significant alterations and additions.
- *Criterion D:* The period of significance for an archeological site is the estimated time when it was occupied or used for reasons related to its importance, for example, 3000-2500 B.C.E.

The following additional guidelines on periods of significance pertain to all Criterion:

²⁸³ *Ibid.*

²⁸⁴ *National Register Bulletin 16a. How to Complete the National Register Registration Form. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997.*

- The property must possess historic integrity for all periods of significance entered.
- Continued use or activity does not necessarily justify continuing the period of significance. The period of significance is based upon the time when the property made the contributions or achieved the character on which significance is based.
- 50 years ago is used as the closing date for periods of significance where activities begun historically continued to have importance and no more specific date can be defined to end the historic period. (Events and activities occurring within the past 50 years must be exceptionally important to be recognized as "historic" and to justify extending a period of significance beyond the limit of 50 years ago.)

(e) Types of Historic Properties

The National Register recognizes various types of historic properties. The categories for documentation are building, district, site, structure, or object. Each type of historic property is discussed below under separate headings.

(i) Building

A building is generally considered to be a structure constructed for the purpose of creating human shelter. When evaluating a property for the National Register, the property is classified according to the main resource. For example, a property containing a house, garage, and barn would be considered a building, because the house would be considered the main resource, and the garage and barn would be considered secondary resources. A building is evaluated individually.

(ii) Historic District

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as a historic district. The National Park Service defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development."²⁸⁵ A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic

²⁸⁵ *Ibid.*

environment or be an arrangement of historically or functionally related properties.”²⁸⁶ A district is further defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.²⁸⁷ A district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.²⁸⁸

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

- It was present during the period of significance, relates to the significance of the district, and possesses its physical integrity; or
- It independently meets the criterion for listing on the National Register.²⁸⁹

(iii) Sites

The National Park Service recognizes a site as a type of resource that can contribute to the significance of a historic district. A historic site is defined as: “the location of a significant event, a prehistoric or historic occupation or activity, or a building or

²⁸⁶ *Ibid.*

²⁸⁷ 36 Code of Federal Regulations 60.3(d).

²⁸⁸ *National Register Bulletin #21.*

²⁸⁹ *National Register Bulletin #12.*

structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural or archeological value regardless of the value of any existing structure.”²⁹⁰

Within the category of “sites”, the National Park Service has defined a cultural landscape as: “a geographic area... associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. There are four general types of cultural landscapes, not mutually exclusive: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes.”²⁹¹

Two of the cultural landscape types are particularly meaningful for the Universal City property – historic sites and historic vernacular landscapes. A historic site is defined as “a landscape significant for its association with an historic event, activity or person.” A historic vernacular landscape is defined as a “landscape that evolved through use by the people whose activities or occupancy shaped that landscape.... Function plays a significant role in vernacular landscapes.”

The National Park Service outlines five defining features for a cultural landscape. These are topography, vegetation, circulation, water features, and structures (includes furnishings and objects). The Park Service goes on to state that “each situation may vary, and some features may often be more important than others.”²⁹²

According to National Park Service guidelines, “it is the arrangement and the interrelationship of these character-defining features as they existed during the period of significance that is most critical...” As such, spatial organization and land patterns are of primary concern when defining and evaluating a cultural landscape.

(iv) Structures

The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter. Examples of structures (as opposed to buildings) include bridges, tunnels, canals, systems of roadways and baths, among others.

²⁹⁰ *National Register Bulletin #16A.*

²⁹¹ *National Park Service website, “Guidelines for the Treatment of Cultural Landscapes” http://www.nps.gov/history/hps/hli/landscape_guidelines/organization.htm, June 15, 2007.*

²⁹² *Ibid.*

(v) *Objects*

The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment. Examples of objects include sculpture, monuments, boundary markers, statuary, and fountains.

(f) *Criteria Considerations*

The National Register limits the eligibility of moved properties, because significance is embodied in location and settings as well as in the properties themselves. A "moved property" is defined as "a property removed from its original or historically significant location."²⁹³ According to National Register Bulletin 15, "moving a property destroys the relationships between the property and its surroundings and destroys associations with historic events and persons. A move may also cause the loss of historic features such as landscaping, foundations, and chimneys, as well as loss of the potential for associated archeological deposits."²⁹⁴ A property removed from its original or historically significant location can be eligible for listing in the National Register if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event. The phrase "most importantly associated" means that it must be the "single surviving property that is most closely associated with the event or with the part of the person's life for which he or she is significant."²⁹⁵

(2) California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups and citizens to identify historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.

²⁹³ *National Register Bulletin #15.*

²⁹⁴ *Ibid.*

²⁹⁵ *Ibid.*

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process.²⁹⁶ The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

The criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property must be at least 50 years of age and possess significance at the local, state, or national level, under one or more of the following four criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
- It is associated with the lives of persons important to local, California, or national history; or
- It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
- It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less

²⁹⁶ *Public Resource Code Section 5024.1.*

rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.²⁹⁷

The evaluation instructions and classification system proscribed by Office of Historic Preservation in its *Instructions for Recording Historical Resources* provide a three-digit evaluation code for use in classifying potential historic resources. In 2003, the codes were revised to addresses the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

- Listed in the National Register or the California Register.
- Determined eligible for listing in the National Register or the California Register.
- Appears eligible for listing in the National Register or the California Register through survey evaluation.
- Appears eligible for listing in the National Register or the California Register through other evaluation.
- Recognized as historically significant by local government.
- Not eligible for listing or designation as specified.
- Not evaluated or needs reevaluation.

(3) Los Angeles County Historic Resources

The County of Los Angeles has established a Historical Landmarks and Records Commission, the purpose of which is to advise and serve as a screening commission for the County Board of Supervisors.²⁹⁸ The enumerated powers and duties of the Commission consist almost exclusively of consideration and recommendation to the Board of Supervisors regarding local historic landmarks worthy of registration as a California Historical Landmark or Point of Historical Interest by the State of California.²⁹⁹ There is no

²⁹⁷ 14 CCR Section 4852.

²⁹⁸ Los Angeles County Code 3.30.010, et seq.

²⁹⁹ Los Angeles County Code 3.30.080.

provision in the ordinance for designation or registration of historic resources by the County itself.

(4) City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962, which was amended in 1985 and 2007 (Section 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. The Los Angeles City Council designates Historic-Cultural Monuments on the recommendation of the City's Cultural Heritage Commission. Section 22.171.7 of the Code defines a historical or cultural monument:

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

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as Historic-Cultural Monuments.

b. Previously Identified Historic Resources on the Project Site

As discussed earlier, a historic resource under CEQA, is a property "listed in, or determined to be eligible for listing in, the California Register of Historical Resources," or is "included in a local register of historic resources," as defined by the Public Resources Code.

No resource or resources contained within the Project Site are currently listed in, nor have any been determined eligible for listing in the National or California Registers.

Similarly, no resource or resources have been designated as Los Angeles Historic-Cultural Monuments.

In 1982, a Historic Resources Inventory form (DPR 523) was prepared for the Universal City/Studios site at 100 Universal City Plaza Drive, Universal City. This form was a revision of a prior DPR 523 inventory form completed in 1977 as part of a countywide survey performed under the direction of the Museum of Natural History according to Office of Historic Preservation criteria. The 1977 form evaluated the property as status code "3S" or "eligible for the National Register." The form refers to the entire property, and it is unclear what elements on the property were considered historic. The 1982 form evaluated the resource as status code "4" or "potentially eligible for the National Register." The Office of Historic Preservation reviewed these forms and entered the evaluations into the California Historic Resources Inventory database. In 2003, status code "4" was essentially eliminated and changed to status code "7". Universal City is currently listed in California Historic Resources Inventory with two status codes, including "3S" and "7N" or "needs to be reevaluated." When resources retain conflicting status codes, the highest level code (in this case, the "3S") takes precedence.

While an evaluation of appearing eligible for listing in the National Register does not lead to automatic listing in the California Register, it does convey evidence of significance under CEQA. However, twenty-five years have passed since the evaluation was made and the 1977 survey form does not specify the criteria under which the evaluators made their judgments, nor does it specify what buildings, structures, or features of the property were evaluated. No historic context was developed, and neither the integrity of the site nor any individual structures assessed. At the time of the evaluation, this was standard practice. However, current preservation practice requires consideration of a property within its historic context and evaluation of its physical integrity. Due to the age of the survey, the absence of a historic context and the lack of an integrity assessment, re-evaluation of the Universal City property, (including the Project Site), is necessary.

c. Historic Resources on the Project Site

The Historic Resources Technical Report concludes that the Project Site contains a group of buildings and a site that collectively form the potential Universal Studios Historic District which is historically significant for its association with the development of the motion picture industry in the United States.

(1) History of the Film Industry in Southern California

Universal Studios is one of a small number of motion picture production facilities, which date from the inception of the motion picture industry in Southern California. Film

production began in Hollywood in 1911 when the Nestor Company leased a small roadhouse known as the Blondeau Tavern on the northwest corner of Sunset Boulevard and Gower Street. The Blondeau property contained a barn, corral, twelve single-room structures and a five-room bungalow, all of which were quickly adapted for filmmaking. Other companies soon followed Nestor to Hollywood including Universal Film Manufacturing Company in 1912 and the Famous Players Company in 1913. The early motion picture studios were often not much more than a ramshackle collection of utilitarian buildings set on open land and surrounded by a high wall or fence. Some of the more sophisticated studios were distinguished by “signature” main buildings and/or entrance gates designed in the popular architectural styles of the day.

By 1920, the American film industry was controlled by fewer than ten companies. Among them were Famous Players-Lasky (later Paramount), Fox, Warner Brothers, United Artists, RKO, Columbia, Metro (later Metro-Goldwyn-Mayer), and Universal. As profits from feature-length silent films grew, the film corporations built substantial physical facilities. Resembling large industrial plants, a typical studio property was several acres in size and enclosed by perimeter walls. Contained inside were facilities for all aspects of film production. In addition to the large, enclosed stage buildings, film studios included set and costume shops, makeup and dressing rooms, production and administration offices, food services, screening rooms, and storage facilities.

While the major studios produced films targeted for the first-run market, some studios, including Universal, sought the second-run market, for which they produced program packages of family entertainment, including shorts, newsreels, and B-features which changed weekly. Universal's B-features included westerns, melodramas, and action films. Most of the leading studios maintained A-feature production units to produce first-run features and B-feature units for second-run products.

Throughout the silent era, films were accompanied by music performed live in the theater. In 1927, the smash success of Warner Brother's “The Jazz Singer” – the first feature-length film to contain synchronized speaking and singing scenes – changed the course of film making. Major renovations took place on most studio lots beginning in 1928 following the advent of sound. In this phase of studio development, the studios retrofitted and expanded facilities to accommodate the new technology. Physical plants became more organized. The stages formed the heart of the production area with set building, editing rooms, storage and other technical facilities located close by. Support spaces, offices, dressing rooms, make-up, costume and art departments were concentrated in areas further removed from the production facilities.

Continuing a practice that began in the 1910s, the studios also maintained adjacent acreage known as “backlots” where elaborate, semi-permanent sets with changeable

facades recreated ancient civilizations, city streets, and exotic locales. While sets were constructed and taken down depending on production needs, several types that could be regularly used would become standard for all studios. These included a New York City street, European streets, and often a Western street. Small town neighborhoods and civic buildings were also common themes.

As more acreage was developed, some studio backlots became incorporated as just another part of the studio property, with little separation between administrative and production facilities. These areas would no longer be referred to as a backlot. Other studios maintained studio “ranches” at another location. Over time, the term “backlot” would become specifically identified with acreage separate but adjacent to studio facilities dedicated to outdoor filming. Several studios, including MGM, Fox, and Universal, would continue to maintain elaborate backlots for decades.

By 1930, the American film industry was dominated by only eight companies including Universal. Leading this group were five companies that controlled the first-run market through corporate ownership of the premier American theater chains. The five “major” studios were Metro-Goldwyn Mayer (MGM), with production facilities located in Culver City; Paramount Pictures, located in Hollywood; Fox Studios (later Twentieth Century-Fox), located in Hollywood and West Los Angeles; Warner Brothers, located in Hollywood and Burbank; and RKO, the smallest of the five, located in Hollywood. In addition to the majors were three “minor” studios: Universal Pictures with production facilities in North Hollywood; Columbia Pictures in Hollywood; and United Artists which functioned largely as a host studio for independent producers. These companies did not own theater chains like the majors and were therefore limited in their access to theater bookings. Another difference between the major and minor studios was the quality of their product. The major studios focused on high-budget, A-feature films subsidized by lower-budget, B-feature films. The output from the minor studios was mostly B-features, with a supporting slate of A-feature films.³⁰⁰

Together, these eight companies controlled 95 percent of film revenues in the United States and set the standard for film production throughout the world.³⁰¹ Their rise to dominance began what is now referred to as “The Studio Era” or Hollywood’s “Golden Age” during which production, distribution and (in the case of the major studios, exhibition), were

³⁰⁰ *A third tier of film studio, devoted almost exclusively to producing B-feature and lower, also developed. Of these, Monogram Studios and Republic Studios were the most successful.*

³⁰¹ *Douglas Gomery, The Hollywood Studio System, A History (London: British Film Institute, 2005).*

all integrated under a single corporate entity. Despite serious financial troubles associated with the Depression, the film studios continued to grow and develop throughout the 1930s to become one of Southern California's primary industries.

In 1949, the five major studios were ordered to divest themselves of their theater chains after the U.S. Supreme Court ruled that continued ownership of the theaters was in violation of Federal anti-trust laws.³⁰² The studios fought to retain theater ownership but ultimately lost their case. And although several years passed before all companies would comply with the divestiture, the decision signaled the beginning of the end of the Studio Era.

Television presented a formidable challenge to the film industry. With the advent of widespread television ownership in the 1950s, movie audiences declined as more people were able to enjoy entertainment in their own home. The studios were forced to downsize and concentrate their resources on differentiating the cinematic experience from television. New widescreen and color processes were developed, production values were improved, and budgets were increased. Specialized technologies such as 3-D were also experimented with as a way to attract audiences.³⁰³

The smaller studios began supplying television programming, both by converting their facilities for television production and by selling or leasing their old features and shorts for presentation on television. Both Universal and Columbia created subsidiaries to produce advertisements for television in the late 1940s. Beginning in 1955, the major studios began to get involved in television production. By 1958 all of the major studios had sold programming to television and were producing television series. Some movie studio plants, such as the Warner Sunset Studios (now KTLA), were converted for television production. Universal had been leasing its facilities to Revue Productions, the television subsidiary of Music Corporation of America, but lacked the capital to produce for television itself.

Throughout the 1950s, the film industry became increasingly focused on independent production. As independent production became the norm, the film studios no longer supported all aspects of film making internally. By the mid-1960s, a new era was firmly established. Because of independent production, major studios financed and distributed films but were not necessarily the place where films were made.

³⁰² *Ibid.*

³⁰³ *Ethan Mordden, The Hollywood Studios, (New York: Alfred A. Knopf, 1988).*

Today, film corporations are part of media conglomerates that produce a wide array of media products and services. Familiar names from the Studio Era include Paramount Pictures owned by Viacom, Warner Bros. Studios owned by Time Warner, and Universal owned by General Electric. By leveraging the strengths of their various businesses, these companies continue to dominate market share on a global scale.

(a) History of Universal City

The history of Universal City can be divided into four periods that are directly associated with changes in ownership and operations. These periods are: (1) the Laemmle Period (1912-1936), (2) the New Universal Period (1936-1958), (3) the Music Corporation of America Period (1959-1996), and (4) the Post-Musical Corporation of America Period (1996-present). Each of these periods has associations with individuals important to the history of filmmaking and the entertainment industry in the United States. In addition, each of these periods brought physical changes to the Project Site according to the business needs and technological challenges of the time.

(i) The Laemmle Period (1912-1936)

Universal Studios was the creation of Carl Laemmle, who began his film career in 1906 when he converted a Chicago storefront into a nickelodeon he named “The White Front Theatre.” Within two months, he had opened a second theatre. The Laemmle theater chain was followed by the Laemmle film service, which shortly became the largest film exchange in the United States. Laemmle continued influencing the shape of the movie industry in 1909, when he challenged the control of the Motion Picture Patents Company, which held a monopoly on motion picture production through its patents on camera and projection equipment, taxing exhibitors heavily for their use. Laemmle declared himself an independent and formed the Independent Motion Picture Company in 1909 to produce his own films.

In 1912, Laemmle created a coalition of film companies called Universal Film Manufacturing Company (Universal), which included Powers Picture Plays, New York Motion Picture Company (Bison Life), Nestor, Champion and Rex Company as well as his own company Independent Motion Picture. During that year, Universal established three studio facilities in the Los Angeles area: one in Hollywood at Sunset and Gower, one at Edendale, and one at the Oak Crest Ranch in the Lankershim Township which is now part of Universal City. Over the next two years, Laemmle incrementally purchased 230 acres of ranch lands located in the Lankershim Township, including the Oak Crest Ranch. During this period, Laemmle acquired sole control of Universal and sold all of his theaters to concentrate on film production and distribution.

Makeshift stages were set up on the Oak Crest Ranch property and the production of western films began at the studio on 1912. On December 6, 1912, an informal studio opening was held. Construction of a permanent studio lot on the Oak Crest site began in 1914 with the relocation of several small buildings from the Sunset Gower (former Blondeau Tavern) studio.

On March 15, 1915, Laemmle's Universal Film Manufacturing Company formally opened the Universal Studio lot, at the time the largest and most modern facility designed for the production of motion pictures. Known as Universal City, it consisted of a 300-foot by 65-foot main stage; a 200-foot by 50-foot second stage; an administration complex located on the Lankershim Boulevard frontage designed in the popular Mission Revival style; costume, makeup and dressing rooms; a laboratory; a theatre; a post office; a hospital; a restaurant; a fire department; carpentry, paint, and property shops; a barber shop and manicure parlor; a studio arsenal; horse corrals; blacksmith and harness shops; an ice plant; barracks which provided quarters for 20 people; and a studio zoo. There was also a 150,000 gallon concrete reservoir at the rear of the ranch as well as a 500,000 gallon reservoir at the summit of Universal City's highest hill. These facilities allowed the studio to perform every aspect of motion picture production on the property. Furthermore, because Laemmle believed that the public was more likely to watch films if they could see how they were made, he instituted a public studio tour which included the viewing of movie making in progress from observation stands built adjacent to the stages, touring the backlot, and a box lunch, all for an admission price of 25 cents.³⁰⁴

In its first year, 250 films were produced at Universal City, with Laemmle dividing his time between corporate headquarters in New York, Universal City, and Europe to promote his product internationally. Production oversight was a constant issue, and Universal City had several managers in its early years. Laemmle needed a capable assistant, and found one in young Irving Thalberg, hired as a secretary to a senior executive in Universal's New York office. Thalberg quickly schooled himself in the motion picture business and advised Laemmle on his operation of Universal. Impressed, Laemmle promoted Thalberg to a position as his executive secretary.

In July of 1919, Thalberg accompanied Laemmle to Universal City, where he became convinced that the studio was suffering from poor management. Thalberg soon recommended that a single person be appointed to coordinate all production on the lot, and

³⁰⁴ Clive Hirschhorn, *The Universal Story*, (London: Octopus Books Limited, 1983).

Laemmle responded by appointing Thalberg. Within six months Thalberg had become the general manager and effective head of the California operation.

By the end of 1920, Universal had profits of \$2.3 million, less than that of the other major studios but still substantial. Determined to bring Universal's profits closer to that of the other major studios, Thalberg tried unsuccessfully to convince Laemmle to upgrade his feature production for the first-run market. Laemmle resisted high-budget features because of their dependence on high-priced talent. He did not believe in the star system, and refused to offer lucrative multi-year contracts.

By the end of 1922 Thalberg had supervised the production of over 100 films and had reorganized the operation of the studio. Under his supervision, Universal had increased its prestige by adding first-run features including the lavish and critically acclaimed "Foolish Wives" (1922), directed by Erich von Stroheim. However, relations between Thalberg and Laemmle were increasingly strained because of their differing strategies for Universal's future and Laemmle's unwillingness to make Thalberg a partner in the studio. In February of 1923, Thalberg left Universal to join Louis B. Mayer, who would soon form Metro-Goldwyn-Mayer, where Thalberg would become head of production.

After Thalberg's departure, Universal would continue to produce a handful of first-run films such as the horror classics "The Hunchback of Notre Dame" (1923) and "The Phantom of the Opera" (1925), both with Lon Chaney. Laemmle continued, however, to concentrate the majority of Universal's resources on films for the second-run market.

In 1927, the success of Warner Brother's "The Jazz Singer" changed the course of filmmaking. Sound pictures required new technology, resulting in a complete overhaul in the filmmaker's craft. Major investments were needed by all the studios to keep their product viable, and in 1928 Universal began a large building program that began when a drainage channel was put underground. Improvements included three new soundproof stages, new office buildings, expansion of the electrical department, a new lumber mill, two fire stations, six new projection rooms, and lighted billboards. The studio tour was suspended as the crowds interfered with sound control. Additionally, all main roads on the lot were paved and sprinkler systems were added to all nine stages in case of fire.

Universal had continued success with horror films with the advent of sound, producing such films as "Dracula" with Bela Lugosi, "Frankenstein" and "The Mummy" starring Boris Karloff, "The Invisible Man" with Claude Rains, "The Bride of Frankenstein," "Werewolf of London," "The Raven," and "Dracula's Daughter" all released between 1931 and 1936. This group of films had a notable influence on the horror genre throughout the film industry. Acclaimed first-run features included the film version of Erich Maria

Remarque's anti-war novel "All Quiet on the Western Front" which won the Academy Award for Best Picture in 1931.

Despite these successes, Universal suffered massive losses during this period due to the economic depression and poor management. Unable to meet debt obligations, Laemmle lost control of the company in March 1936. Universal was taken over by investor J. Cheever Cowdin and Laemmle ended all association with the studio.

(ii) New Universal Period (1936-1958)

Under the new management, film budgets were reduced and directors and production supervisors were kept on a very short leash to control costs. Universal upgraded its slate of short films, serials and B-feature programmers while also producing some notable first-run pictures including an acclaimed production of "Show Boat" and the classic screwball comedy "My Man Godfrey," both released in 1936. These changes, however, failed to make the company profitable. Universal lost \$1.6 million in 1936 and \$1 million again in 1937. In response, Cowdin hired two ex-RKO executives, Nate J. Blumberg and Cliff Work, to run the studio. Together they brought Universal back to profitability by the end of 1938.

Universal's financial turnaround was due in large part to the signing of popular performers under long-term contract, something Laemmle had always resisted. One important star was the teenaged singing sensation Deanna Durbin, who made twenty-one box office hits before leaving Universal in 1948. Even bigger money makers were found in the comedy team of Abbott and Costello. Minor figures on radio, Abbott and Costello became huge stars at Universal, making films that consistently brought in millions at the box office. Also notable were a popular series of Sherlock Holmes films starring Basil Rathbone, and a string of Technicolor B-films set in exotic locales that starred Jon Hall and Maria Montez.

By 1945, Universal was a solid profit maker, releasing an average of one film per week. Anticipating selling the studio, Cowdin used the profits for improving the studio facilities. Two new stages were built, existing buildings were enlarged, and the roads were widened.

On October 1, 1946, Cowdin and Blumberg announced that Universal had been sold to International Pictures Corporation to form Universal-International Pictures Corporation. The new management fired most of the old Universal staff, and increased budgets on first-run features. Studio system rules were thrown out as freelance talent and independent producers were welcomed. Beginning in 1950, Universal's income rose for eight straight years while the other leading studios watched their income decline. Universal added

140 acres at the eastern end of the studio property during the 1950s, almost doubling the size of the backlot and making it the largest movie studio in the world.

The president of Decca Records gained majority control of Universal-International in 1952, making it a subsidiary in Decca's entertainment conglomerate. The new management continued to broker independent deals with top talent including James Stewart, Tyrone Power, Gregory Peck, and Alan Ladd. Throughout the 1950s, the continued success of the "Ma and Pa Kettle" series, glossy melodramas directed by Douglas Sirk ("Magnificent Obsession," and "Written on the Wind,"), westerns and science-fiction thrillers brought in big profits. By 1958, however, Universal-International was again losing money.

In December of 1958, Universal-International sold the then 367-acre studio property to Music Corporation of America with a lease back arrangement for facilities needed for film production. At this time, Universal-International ceased to own Universal City.

(iii) Music Corporation of America (1959-1996)

Music Corporation of America (MCA) was led by founder and chairman Dr. Jules Stein and president Lew Wasserman. Through their innovative approach to the entertainment industry, Stein and Wasserman pioneered a new era in contract and production relationships.

Stein started MCA in 1924 as a small Chicago agency that booked bands for ballroom dances. The agency opened an office in downtown Los Angeles in 1930, and by the mid-1930s represented more than half of the major big bands in the country. In 1936, MCA moved to Beverly Hills and was transformed into a talent agency specializing in big name film stars. By 1950, MCA had become the leading agency in Hollywood, retaining more talent under contract than any studio. When Stein retired from the presidency of MCA in 1946, Lew Wasserman, who was largely responsible for MCA's success in Hollywood, became president and chief executive officer.

As studios shifted toward co-productions and star vehicles with independent producers in the late 1940s, Wasserman became the leading agent, packaging more projects than anyone else in the movie industry. One of the most important of Wasserman's deals was with James Stewart. The arrangement was for Universal to pay Stewart a percentage of the net profits of the film, throughout the film's economic life, instead of a salary up front. This deal was an indication of the changing power structure in the film industry at the time. The Universal-Stewart deal led to a series of successful, high quality Universal films starring Stewart in the 1950s.

By 1958, Wasserman was considered the most powerful man in the entertainment industry and MCA was considered a model of diversification. That year, the name of Music Corporation of America was officially changed to MCA.

In 1962, MCA left the talent agency business to focus on the expanding business of film and television production. That same year, MCA completed its acquisition of Universal-International and consolidated its motion picture, television, and recording entities into one large entertainment complex with headquarters at Universal City.

MCA added new permanent sets and equipment at Universal City and upgraded the sound stages. By 1962 the acreage of the lot had also been expanded. The original Mission Revival front office complex on Lankershim Boulevard was demolished to make way for a new complex of buildings including a 14-story world headquarters building for MCA, the Bank of America Building, a new post office, and a new commissary.

The facilities and personnel at Universal City proved to be well suited to television production and the studio greatly increased its emphasis on television production. Hit shows, included "Alfred Hitchcock Presents," "Leave It to Beaver," "The Virginian," and "Ozzie and Harriet." Universal's profits (including feature film and television production) increased substantially between 1961 and 1962. After 50 years under the shadow of the major studios, Universal had become the leader in both television and film production.

MCA continued to diversify and expand its holdings, becoming involved in book publishing, home video and retail merchandising. On July 4, 1964, MCA re-opened the Universal Studios Tour to the public. Visitors rode a bus through the site to view stages, stunt shows, and movie sets. The tour proved to be enormously popular and has continuously evolved to stay current with production trends. In 1972, 15 acres were added to the tour area to allow several full-scale production demonstrations. A 340-seat theatre (the Alfred Hitchcock Theatre) was built and the outdoor amphitheater (originally built to showcase stunt demonstrations) was expanded to accommodate 6,000. In 1982, the amphitheater was redesigned, enlarged, and enclosed. It reopened as a state-of-the-art 6,200-seat indoor theater, which now hosts concerts and special events. The tour has continually evolved and expanded to include thrill rides and attractions based on blockbuster films. Today, the Studio Tour at Universal Studios Hollywood is one of the most popular tourist attractions in Southern California.

In 1990, MCA acquired GRP Records, a leading jazz label, along with the David Geffen Company. These companies became Geffen Records in 1992. In 1991, MCA was purchased by Matsushita Electric Industrial Company, Ltd, the world's largest manufacturer of consumer electric and electronics products.

In an effort to link all the entertainment venues in Universal City, MCA developed Universal CityWalk, a pedestrian promenade that opened in 1993. The two-block long pedestrian promenade features more than three dozen retail shops, specialty restaurants, and movie theaters.

(iv) Post MCA Period (1996-2008)

In 1995, Edgar Bronfman, Jr., CEO of the Joseph Seagram Company, Ltd., purchased an 80% interest in MCA, which was renamed Universal Studios, Inc. in 1996. In 1998, the Seagram Company purchased Polygram Holdings, transforming Universal into the largest music company in the world.

In 2000, Vivendi, Canal, and Universal Studio Inc.'s parent The Seagram Company Ltd., announced a strategic business combination that created Vivendi Universal, a leading global media and communications company. In 2004, NBC Universal was formed through the combining of NBC and Vivendi Universal Entertainment, becoming one of the world's leading media and entertainment companies in the development, production, and marketing of entertainment, news, and information to a global audience. The newly formed company owns and operates a valuable portfolio of news and entertainment networks, a premier motion picture company, substantial television production operations, a leading television stations group, and world-renowned theme parks. NBC Universal is 80% owned by General Electric and 20% owned by Vivendi.

In June 2008, a fire on the Project Site destroyed several buildings and set areas including the New York Street set area, the King Kong Building, and a video vault. New sets are being constructed to replace the facades destroyed in the fire.

(b) Evaluation of Significance

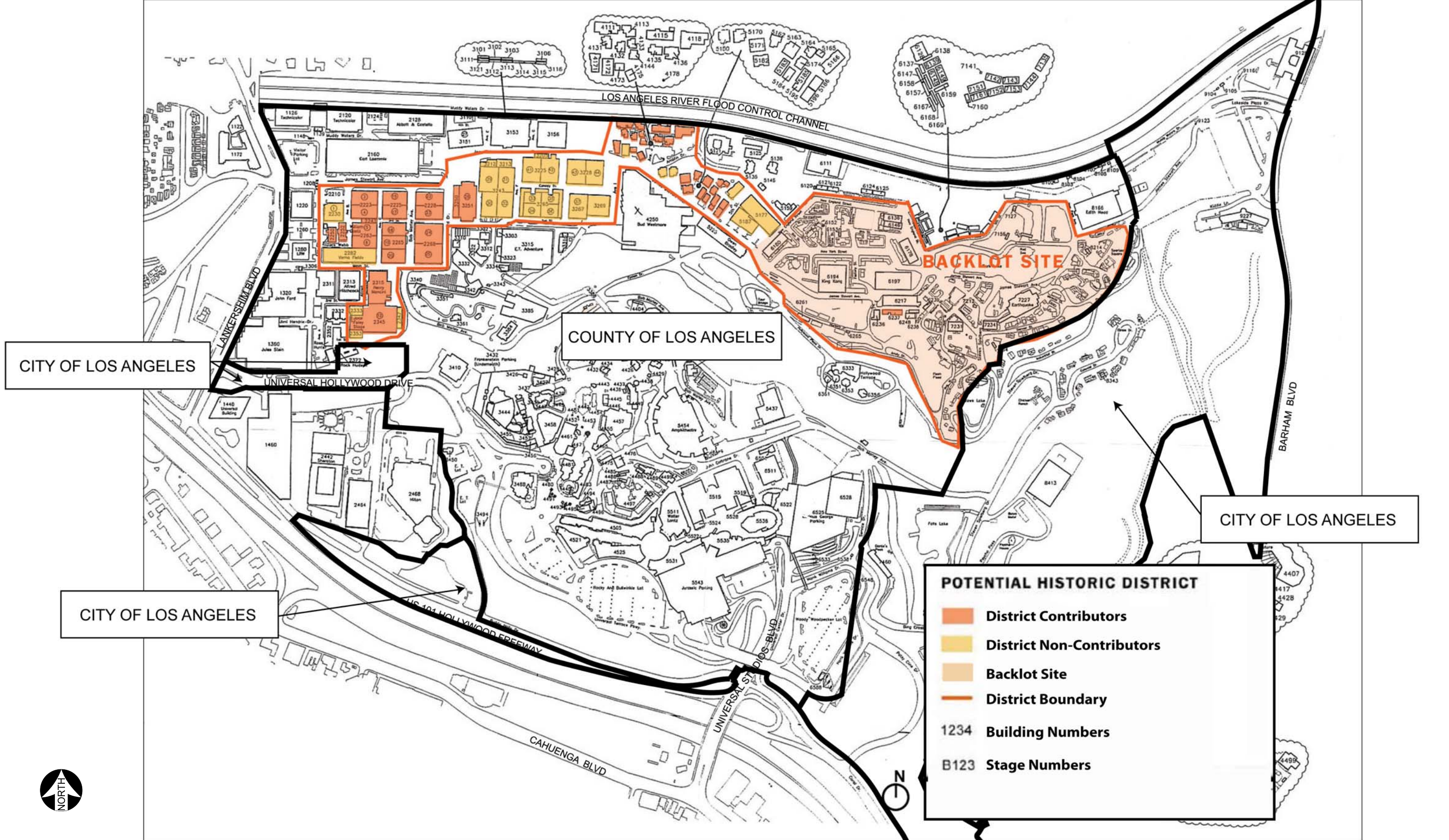
The Historic Resource Technical Report determined that the Project Site does not appear to contain resources eligible for listing in the National Register due to the alterations, relocations, and additions to contributing resources within the potential Universal Studios Historic District. However, the Project Site appears to be eligible for listing in the California Register under Criterion 1 as an intact group of resources that date from Universal Studio's development as a notable film studio during the early silent film era, and its maturation as one of eight leading film studios during the Studio Era. The period of significance for the potential Universal Studios Historic District extends from 1912, when the Lankershim property was first used as a film location, to 1958, when the Universal-International studio property was sold to MCA. This timeframe includes Universal Studio's initial establishment of motion picture production facilities in Southern California, its development as an important film studio during the silent film era, and its maturation as one

of eight leading film studios during the Studio Era. The sale of the studio property to MCA in 1958 roughly coincides with the end of the Studio Era and the beginning of a new era where film studios focused their efforts on the financing and distribution of films created by independent producers.

Boundaries for the potential Universal Studios Historic District are shown on Figure 200 on page 1630. The potential Universal Studios Historic District is confined to the northern portion of the Project Site where film production activity was concentrated between 1912 and 1958. It is largely contained by the proposed Business Area and Studio Area, however, portions also overlap the Mixed-Use Residential Area. The geographic boundaries of the potential Universal Studios Historic District as illustrated in Figure 200 contain sixty buildings in total. Of these, forty are considered contributors to the potential district and twenty are considered non-contributors. As discussed above, a contributor to a historic district adds to the historic associations or historic architectural qualities, while a non-contributor does not. The potential Universal Studios Historic District also contains the Universal Studios Backlot Site, an area in the northeastern portion of the Project Site that is considered a contributing site to the potential Universal Studios Historic District.

All of the contributing buildings from the period of significance have experienced some level of alteration and/or relocation since their original construction. Several buildings that date from the period of significance, including service buildings, stages, and office bungalows, have seriously compromised integrity due to the level of alteration they have sustained. A large collection of bungalow buildings has been relocated from their original locations and therefore no longer retains integrity of location. Motion picture studios, however, relocate and re-use buildings as a function of their business, and have done so throughout their history. This is particularly true of office and service bungalows, a building type especially adaptable to relocation and adaptive re-use. As such, the relocation of buildings can be understood as a defining characteristic of motion picture studios. Other aspects of integrity such as design, workmanship, feeling and association are more important than location in this context. A listing of the district's contributing and non-contributing resources are listed in Table 142 on page 1631.

Universal Studios Backlot Site, an area in the northeastern portion of the Project Site, is a site that contributes to the significance of the potential Universal Studios Historic District. As such, the Universal Studios Backlot Site is considered a historic vernacular landscape. The character-defining features of the Universal Studios Backlot Site are: (1) topographic characteristics of its location including the relatively flat expanse of land where the primary sets are located and the hills that to the south and east; (2) the circulation pattern of streets, roads and trails; and (3) the large scale sets recreating different streetscapes and locations and arranged along key segments of the circulation system.



Source: Historic Resources Group, 2010.

**Table 142
Potential Historic District Resources**

Number	Name	Date	Resource Type	District Status
None	Backlot	c. 1915	Site	Contributor
2223	Stages 3 & 4	1916/1930	Stage	Contributor
2225	Sound Stages 16 & 17	1916/1930	Stage	Contributor
2228	Sound Stages 22, 23,	c. 1925	Stage	Contributor
2230	Sound Stage 1	c. 1960	Stage	Non-contributor
2243	Power House	c. 1920	Utility	Contributor
2250	Jack Webb	1940	Office	Contributor
2252	William Goetz Bldg.	1941	Office	Contributor
2263	Stages 5 & 6	1916/1938	Stage	Contributor
2265	Sound Stages 18, 19 and 20	c. 1928	Stage	Contributor
2268	Sound Stages 24 and 25	1939	Stage	Contributor
2282	Verna Fields Bldg.	1914/1957 /1960	Studio Services	Non-contributor
2315	Henry Mancini Bldg.	1928	Stage, post-production	Contributor
2333	Jack Foley Stage	1963	Stage	Non-contributor
2345	Sound Stage 12	1928	Stage	Contributor
2347	Sound Repair Shop	1959	Shop	Non-contributor
2353	Storage	1959	Storage	Non-contributor
3205	Power House	1964	Utility	Non-contributor
3212	Backlot Café	After 1964	Studio Services	Non-contributor
3213	Office	Post 1964	Office	Non-contributor
3225	Stage	c.1960	Stage	Non-contributor
3228	Stage	c. 1960	Stage	Non-contributor
3243	Stage	1964	Stage	Non-contributor
3250	Phantom Stage Storage	1939	Storage	Contributor
3251	Sound Stage 28 ("Phantom Stage")	1924	Stage	Contributor
3265	Soundstages 33, 34, 35, and 36	1959	Stage	Non-contributor
3267	Soundstage 37	c.1970	Stage	Non-contributor
3269	Rehearsal Hall	c. 1970	Stage	Non-contributor
4111	Office Bungalow	1944 (81) c. 1950 (414)	Office / Service Bungalow	Contributor
4113	Office Bungalow	1941	Office / Service Bungalow	Contributor
4115	Office Bldg. C	1946	Office / Service Bungalow	Contributor
4118	Office Bldg. D	c. 1945	Office / Service Bungalow	Contributor
4131	Office Bungalow	1940	Office / Service Bungalow	Contributor
4132	Office Bungalow	1941	Office / Service Bungalow	Contributor
4133	Office Bungalow	1941	Office / Service Bungalow	Contributor
4135	Office Bungalow	1944	Office / Service Bungalow	Contributor
4136	Office Bungalow	c. 1940	Office / Service Bungalow	Contributor

Table 142 (Continued)
Potential Historic District Resources

Number	Name	Date	Resource Type	District Status
4144	Office Bungalow	1940	Office / Service Bungalow	Contributor
4171	Office Bungalow	c. 1955	Admin. and Office	Contributor
4172	Office Bldg./ Dressing Room	1925 (portion)	Office / Service Bungalow	Non-contributor
4173	Office Bungalow	c. 1930	Office / Service Bungalow	Contributor
4175	Office Bungalow	c. 1925	Office / Service Bungalow	Contributor
5162	Office Bungalow	c. 1941	Office / Service Bungalow	Contributor
5163	Office Bungalow	c. 1950	Office / Service Bungalow	Contributor
5164	Office Bungalow	1940	Office / Service Bungalow	Contributor
5165	Office Bungalow	c. 1940	Office / Service Bungalow	Contributor
5166	Office	c. 1990	Office	Non-contributor
5170	Office Bungalow	c. 1960	Office	Non-contributor
5171	Office Bungalow	1954	Office / Service Bungalow	Contributor
5174	Office Bungalow	c. 1940	Office / Service Bungalow	Contributor
5177	Storage Building	c. 1965	Storage	Non-contributor
5180	Office Bungalow	c. 1960	Office / Service Bungalow	Non-contributor
5182	Office Bungalow	c. 1955	Office / Service	Contributor
5183	Office Bungalow	c. 1945	Office / Service Bungalow	Contributor
5184	Office Bungalow	1941	Office / Service Bungalow	Contributor
5185	Office Bungalow	1928 (106)	Office / Service Bungalow	Contributor
5186	Office Bungalow	1953	Office / Service Bungalow	Contributor
5187	Office Building	1964	Office Building	Non-contributor
5195	Office Bungalow	1926 (105)	Office / Service Bungalow	Contributor
5196	Office Bungalow	1953	Office / Service Bungalow	Contributor
6237	Film Vault	1946	Storage	Contributor
<hr/> <p><i>Source: Historic Resources Group, March 2010.</i></p>				

(c) Conclusions

The Project Site contains the potential Universal Studios Historic District. While the potential Universal Studios Historic District does not appear eligible for the National Register due to a lack of physical integrity, the potential Universal Studios Historic District does appear to meet criteria for listing on the California Register and should therefore be considered a historic resource for the purposes of the California Environmental Quality Act.

The potential Universal Studios Historic District is located in the northern portion of the Project Site and contains sixty buildings in total. Of these, forty are considered contributors to the potential district and twenty are considered non-contributors. The potential Universal Studios Historic District also contains the Universal Studios Backlot Site, an area in the northeastern portion of the Project Site that is considered to be a contributing site. Because the potential Universal Studios Historic District is located on a portion of land in unincorporated Los Angeles County, no local designation program is applicable.

As the Project Site contains a historic resource subject to California Environmental Quality Act, impacts associated with the proposed Project to the historic resources within the Project Site must be analyzed. However, the historic resource identified in the Historic Resource Technical Report is limited to the area within the boundaries of the potential Universal Studios Historic District. No potential impacts associated with proposed new development outside of the potential Universal Studios Historic District were identified. Therefore, any potential impacts to historic resources would only have the potential to occur within the potential Universal Studios Historic District.

d. Historic Resources in the Project Vicinity

The Campo de Cahuenga is a historic resource located directly west of the Project Site at the Universal City Metro Red Line Station, near the northwest corner of Lankershim Boulevard and Campo de Cahuenga Way. Campo de Cahuenga is listed on the National Register of Historic Places, listed as a California Historical Landmark, and locally designated as a City of Los Angeles Historical-Cultural Monument. Campo de Cahuenga is the site of the adobe where Lt. Col. John Fremont and General Andres Pico signed the Articles of Capitulation (Treaty of Cahuenga) in 1847 during the Mexican-American War. The Articles of Capitulation ended the hostilities between Mexico and California and led to the formal end of the war in 1848. The original 1795 adobe eventually deteriorated and the City of Los Angeles acquired the property in 1923. The adobe was excavated in 1931, and the existing park and building were constructed in 1949-50.

The Barham Boulevard Crossing (Bridge Number 53 0466) is a concrete slab bridge located south of the Project Site where Barham Boulevard crosses the Hollywood Freeway (US 101). Constructed in 1940, this reinforced concrete bridge spans the freeway in two shallow segmental arches supported by a single pier. Features of the bridge's PWA Modern architectural style include a faceted concrete balustrade with hexagonal posts and ornamental streetlight standards. The Barham Boulevard Crossing was determined eligible for listing in the National Register as a contributing feature of the Cahuenga Pass Transportation Corridor through a consensus determination by the California Department of

Transportation (Caltrans) and the State Office of Historic Preservation on November 14, 1997.

3. Environmental Impacts

a. Methodology

The Project's historical assessment is based in part on a review of previous historic evaluations and environmental documentation regarding properties within, and in the vicinity of the proposed Project Site. Additionally, relevant existing plans and drawings of the properties were reviewed including, but not limited to, the date and method of construction of each of the buildings within the Project Site. Each of the Project buildings, as well as the Project Site itself, was evaluated for historical significance pursuant to the provisions set forth in the National Historic Preservation Act (i.e., the National Register), Sections 5024 and 5024.5 of the California Public Resources Code, Sections 15064.5(a)(2)-(3) of the State CEQA Guidelines, as well as criteria established by the City of Los Angeles.

b. Thresholds of Significance

The *City of Los Angeles CEQA Thresholds Guide* (2006, p. D.32) states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. A substantial adverse change in significance occurs if the project involves:

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

In addition to this guidance provided by the City of Los Angeles, the State Legislature, in enacting the California Register, also amended California Environmental Quality Act to clarify which properties are significant, as well as which project impacts are

considered to be significantly adverse. The County of Los Angeles does not provide a separate significance threshold to be used in evaluating historic resources.

A project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.³⁰⁵

The State CEQA Guidelines defines a “substantial adverse change” as follows:

*Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.*³⁰⁶

The Guidelines go on to state that “[t]he significance of a historic resource is materially impaired when a project ... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources ..., local register of historical resources ..., or its identification in an historical resources survey.”³⁰⁷

According to National Register Bulletin 15, to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it must also have integrity. Integrity is defined as the ability of a property to convey its significance.

As such, the test for determining whether or not the project will have a significant impact on the identified historic resources is whether it will materially impair their physical integrity such that they would no longer be listed in the National or California Registers or other landmark programs such as the City’s list of Historic-Cultural Monuments.

The significance thresholds established by the City of Los Angeles include, and go beyond, all of the provisions set forth in the CEQA Guidelines and as such, the significance

³⁰⁵ *California Environmental Quality Act Guidelines, Section 15064.5(b).*

³⁰⁶ *California Environmental Quality Act Guidelines, Section 15064.5(b)(1).*

³⁰⁷ *California Environmental Quality Act Guidelines, Section 15064.5(b)(2).*

thresholds set forth in the *City of Los Angeles CEQA Thresholds Guide* are used in the following analysis.

c. Project Design Features

As part of the proposed Project, the alteration of contributing buildings, structures and sites within the potential Universal Studios Historic District shall comply with the Universal Studios Historic District Preservation Plan (See Appendix L-1-2 of this Draft EIR). The Plan provides appropriate guidance for the alteration of contributing buildings, structures, and sites within the potential Universal Studios Historic District and establishes criteria for new construction to ensure that the historic integrity of the district is maintained. The Plan should serve as the framework for future repair, maintenance, and rehabilitation, and guide architects and designers in designing compatible new construction in the areas identified as potential sites for new buildings within the district. The Plan also includes guidelines for the documentation of historic resources.

d. Project Impacts

(1) Contributing Resources

There are sixty buildings in the potential Universal Studios Historic District. Of these, forty are contributing and twenty are non-contributing. The sixty buildings within the potential Universal Studios Historic District boundaries include forty-two buildings that date from the period of significance. Of these, forty have maintained a level of integrity assessed as either good or fair and are therefore considered contributors. Of the forty contributing buildings, five are proposed to be demolished. These buildings are listed in Table 143 on page 1637.

The demolition of three of these buildings represents a substantial loss of representative building types. The Film Vault (#6237) is the only remaining film vault from the period of significance. Its demolition would eliminate this building type from the potential Universal Studios Historic District. The Jack Webb (#2252) and William Goetz (#2250) buildings represent two of only four contributing office buildings from the period of significance. Their demolition would result in a 50-percent reduction of this building type from the potential Universal Studios Historic District. The Webb and Goetz buildings are the best remaining examples of the office building type on the Project Site and their largely intact architectural features play an important role in the ability of the district to convey its historic associations. Moreover, their location near the studio's official entrance serves as an orientation to the Project Site's historic core. The demolition of these buildings would reduce the integrity of the potential Universal Studios Historic District and constitute a

Table 143
Contributing Buildings to the Potential Historic District to be Demolished

Number	Name	Date	Resource Type	District Status
2250	Jack Webb Bldg.	1940	Office Building	Contributor
2252	William Goetz Bldg.	1941	Office Building	Contributor
4111	Office Bungalow	1944 and c. 1950	Office/Service Bungalow	Contributor
4113	Office Bungalow	1941	Office/Service Bungalow	Contributor
6237	Film Vault	1946	Storage	Contributor

Source: Historic Resources Group, March 2010.

substantial adverse change. As such, without mitigation, the proposed Project would have a significant impact with respect to the potential Universal Studios Historic District.

For the remaining contributing resources, no conversion or alteration of those buildings is anticipated under the Conceptual Plan, discussed in detail in Section II, Project Description, of this EIR. Therefore, there would be no significant impact under the Conceptual Plan to those remaining contributing resources. If the remaining contributing resources were to be converted or altered in a manner consistent with their existing use, form, and materials, then it is not anticipated that the integrity of the remaining contributing resources would be diminished and there would not be a significant impact to the potential Universal Studios Historic District. It should be noted that many of these buildings have been altered over the years.

Although there are currently no plans for conversion, rehabilitation or alteration of these remaining contributing resources, should such activities be undertaken in the future, a significant impact could occur, with the extent of the actual impact contingent upon the individual development activity. However, implementation of the Universal Studios Historic District Historic Preservation Plan, pursuant to the County Specific Plan would reduce impacts to these resources to a less than significant level.

The Universal Studios Backlot Site is a contributing site to the potential Universal Studios Historic District. Within the Universal Studios Backlot Site, two sets dating from the period of significance (Western Street and Park Lake) are to be demolished and would not be rebuilt. However, the Universal Studios Backlot Site would continue to retain its historic use and primary character-defining features. In addition, a portion of the Universal Studios Backlot Site's land area would be given over for adjacent new uses and the hillside areas to the east would be graded. Despite these alterations, the backdrop to the backlot site

would remain and the Universal Studios Backlot Site would continue to function as a location for outdoor filming, and would retain its primary character-defining features and ability to convey its important historic associations. Therefore, the Universal Studios Backlot Site would continue to be considered a historic site contributing to the potential Universal Studios Historic District.

(2) Non-Contributing Buildings and New Construction within the District

Of the twenty non-contributing buildings within the potential Universal Studios Historic District, five are proposed for demolition. These five would be replaced by four new structures in roughly the same locations. The placement of buildings as reflected in the Conceptual Plan appears compatible with the potential Universal Studios Historic District and would not result in significant impacts to the potential Universal Studios Historic District. In addition, the proposed Universal Studios Historic District Historic Preservation Plan establishes basic criteria for new construction in order to maintain the character within the potential Universal Studios Historic District. Therefore, the replacement of non-contributing buildings with new construction would not result in significant impacts to the potential Universal Studios Historic District.

Potential impacts from the demolition of contributing buildings could reduce the integrity of the potential Universal Studios Historic District. With incorporation of the proposed Universal Studios Historic District Historic Preservation Plan, potential impacts would be reduced to a less than significant level.

(3) Impacts to Historic Resources in the Project Vicinity

Two historic resources have been identified within the Project vicinity outside the Project Site boundary. Campo de Cahuenga is located west of the Project Site across Lankershim Boulevard, and the Barham Boulevard Crossing is located south of the Project Site where Barham Boulevard crosses the Hollywood Freeway. Campo de Cahuenga is significant in the context of the Mexican-American War in 1847, and the construction of the existing park and building in 1949-50. The Barham Boulevard Crossing is significant in the context of early planning of the Los Angeles freeway system and as a representative example of reinforced concrete construction of the 1940s. Neither of these contexts is associated with the history of the film industry or the significance of the potential Universal Studios Historic District. All new development considered by the proposed Project would be contained within the Project Site and would not materially affect either resource. Therefore, nothing anticipated by the proposed Project would result in an adverse change to the historic significance of either Campo de Cahuenga or the Barham Boulevard Crossing.

(4) Impacts Under No Annexation Scenario

The proposed annexation/detachment of areas between the City of Los Angeles and County of Los Angeles would not alter historic resources at the Project Site because this potential is independent of jurisdictional boundaries. Further, the potential Universal Studios Historic District is located within the County under the existing and proposed jurisdictional boundaries. As such, potential impacts would remain the same as those identified above and implementation of the recommended mitigation measures would still reduce these impacts to a less than significant level even if the proposed annexation/detachment were implemented.

4. Cumulative Impacts

Cumulative impacts to historic resources evaluate whether impacts of the proposed Project and related projects (see Table 7, Related Projects List), when taken as a whole, substantially diminish the number of historic resources within the same or similar context or property type. Impacts to historic resources, if any, tend to be site-specific. Two historic resources have been identified in the immediate vicinity of the Project Site. The first, Campo de Cahuenga, is located directly west of the Project Site at the Universal City Metro Red Line Station, near the northwest corner of Lankershim Boulevard and Campo de Cahuenga Way. The second resource, the Barham Boulevard Crossing, is located south of the Project Site where Barham Boulevard crosses the Hollywood Freeway. Campo de Cahuenga is significant in the context of the Mexican-American War in 1847, and the construction of the existing park and building in 1949-50. The Barham Boulevard Crossing is significant in the context of the early planning of the Los Angeles freeway system and as a representative example of reinforced concrete construction of the 1940s. Neither of these contexts is associated with the history of the film industry or the significance of the potential Universal Studios Historic District, so the proposed Project would have no impact on the historic significance of Campo de Cahuenga or the Barham Boulevard Crossing. All new development considered by the proposed Project will be contained within the Project Site and will not materially affect either resource. Therefore, the impacts to historic resources on the Project Site would not affect the historic resources in the immediate vicinity within the same or similar context or property type. Moreover, it is anticipated that historic resources that are potentially affected by related projects would also be subject to the same requirements of CEQA and of the City of Los Angeles Cultural Heritage Ordinance as the proposed Project. These determinations would be made on a case-by-case basis and the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. However, given the fact that the proposed Project would have a less than significant impact with respect to historic resources, the proposed Project would not

contribute to any potential cumulative impacts. Thus, cumulative impact to historic resources would be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

Project Design Feature J.1-1: As part of the proposed Project, the alteration of contributing buildings, structures and sites within the potential Universal Studios Historic District shall comply with the Universal Studios Historic District Preservation Plan (See Appendix L-1-2 of this Draft EIR). The Plan provides appropriate guidance for the alteration of contributing buildings, structures, and sites within the potential Universal Studios Historic District and establishes criteria for new construction to ensure that the historic integrity of the district is maintained. The Plan should serve as the framework for future repair, maintenance, and rehabilitation, and guide architects and designers in designing compatible new construction in the areas identified as potential sites for new buildings within the district. The Plan also includes guidelines for the documentation of historic resources.

b. Mitigation Measures

The following mitigation measures would reduce the impacts associated with the proposed Project, to a less than significant level:

Mitigation Measure J.1-1: Retain and/or relocate the 1946 Film Vault (#6237) to avoid its demolition.

Mitigation Measure J.1-2: Retain and/or relocate the Jack Webb (#2250) and William Goetz (#2252) buildings to avoid their demolition.

Mitigation Measure J.1-3: Maintain the Universal Studios Backlot Site identified on Figure 200 as an area of open space primarily used for outdoor filming using large-scale, semi-permanent sets. Retain important character-defining features including: (1) the location in the northeastern portion of the Studio Area, adjacent to the motion picture production facilities; (2) the circulation pattern of streets, roads and trails; and (3) the large scale sets recreating different

streetscapes and locations and arranged along key segments of the circulation system.

Mitigation Measure J.1-4: Provide a clear delineation between the new residential development and the studio areas through appropriate design measures. These might include a shift in grade level, a landscaped buffer zone, and/or walls or other barriers.

6. Level of Significance After Mitigation

The project design feature and mitigation measures listed above would reduce the impacts to historic resources. The potential Universal Studios Historic District would remain eligible for listing in the California Register. The alteration or rehabilitation of the remaining contributing buildings and the design of new construction would be complying with the Secretary of the Interior's Standards pursuant to the Universal Studios Historic District Historic Preservation Plan. Therefore, the proposed Project would have a less than significant impact to historical resources located within the Project Site after mitigation.