

FINAL ENVIRONMENTAL IMPACT REPORT

Cornfield Arroyo Seco Specific Plan (CASP) Update

Environmental Case: ENV-2021-2643-EIR
State Clearinghouse No.: 2021040206

Project Location: The Project Area comprises the entire area within the boundaries of the existing Cornfield Arroyo Seco Specific Plan (CASP), which is generally bordered by Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north. The Project Area is located entirely within Los Angeles City Council District One and within both the Downtown and the Northeast Los Angeles Community Plan Areas. Interstate 5 (I-5) and State Route-110 (SR-110) bisect the northern portion of the Project Area. Entrances and exits to and from SR-110 are located on the northern perimeter of the Project Area. Entrances and exits to I-5 are located at North Broadway/Pasadena Avenue and at Avenue 26 across from Lacy Street. Other major arterials located in the Project Area include Figueroa Street in the northern portion of the Project Area, San Fernando Road in the central portion of the Project Area, and Spring Street, Broadway Avenue, and Main Street in the southern portion of the Project Area. The Project Area is approximately 600 acres (0.93 square miles).

Council District: 1 (Hernandez)

Project Description: The Proposed Project is an update of the existing CASP. The update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project would strengthen the existing CASP's affordable housing requirements, including the recalibration of the CASP's existing incentive zoning system; establish a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; include provisions that facilitate the production of new 100% affordable housing and permanent supportive housing projects on public land; increase the zoning capacity for housing in targeted areas; and adopt a modernized zoning system based on the City's new modular Zoning Code. The Proposed Project would supersede the text, maps, and tables of the existing CASP, and will include the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), community plans, the Los Angeles Municipal Code (LAMC) Chapter 1 and Chapter 1A, specific plans, and other City ordinances.

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Department of City Planning

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1.0 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared by the Los Angeles Department of City Planning (DCP) for the proposed project, which includes the Cornfield Arroyo Seco Specific Plan (CASP) Update (herein referred to as “Proposed Project” or “Project”). This Final EIR complies with the requirements of the California Environmental Quality Act (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq.) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.) (the “CEQA Guidelines”).

1.1 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, CEQA requires the lead agency to prepare and certify a Final EIR. According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the Draft EIR;
- Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency.

As shown, under the CEQA Guidelines, the Final EIR includes the Draft EIR as well the other items listed. For purposes of clarity, the term “Final EIR” in this document refers to everything contained in this document (as described in Section 1.3, below) and not the Draft EIR. The term “EIR” in this document refers to the Final EIR and the Draft EIR.

1.2 PUBLIC REVIEW PROCESS

Pursuant to CEQA Guidelines Section 15082, the City filed a Notice of Preparation (NOP) with the State Clearinghouse in the Office of Planning and Research (State Clearinghouse No. 2021040206) as an indication that an EIR would be prepared. The Department of City Planning published the NOP for this Draft EIR for a 30-day public review period on April 8, 2021. The NOP was distributed to trustee agencies, responsible agencies, and other interested parties to request information and concerns relative to the potential environmental impacts of the Proposed Project.

Information, data and observations addressing comments from these letters were included throughout the Draft EIR where relevant. The NOP and NOP comment letters received are included in Appendix A of this EIR. A public Scoping Meeting was held on April 22, 2021, to provide early consultation for the public to express their concerns about the Proposed Project and to acquire information and make recommendations on issues to be addressed in the Draft EIR, including the scope of impacts, alternatives, and potential mitigation. The Draft EIR was circulated for a 60-day public review from July 10, 2023 to September 18, 2023.

1.3 CONTENT AND ORGANIZATION OF THE FINAL EIR

The Final EIR (this document) summarizes the project information presented in the Draft EIR and contains responses to comments on environmental issues received from agencies, organizations, and individuals who reviewed the Draft EIR. Chapters 1 through 6 of the Draft EIR, in addition to the following chapters, together constitute the Final EIR as required by the CEQA Guidelines.

- **Chapter 1 – Introduction.** This chapter summarizes the contents of the Final EIR and the environmental review process.
- **Chapter 2 – Corrections and Additions to the Draft EIR.** This chapter provides a list of changes that were made to the Draft EIR. These revisions are shown in strikeout and underline text in this chapter.
- **Chapter 3 – Responses to Comments.** During the public review period for the Draft EIR, the City received 10 comment letters. This chapter contains summaries of these comment letters and the City’s responses to those comments that raise significant environmental points. A list of individuals, organizations, and public agencies commenting on the Draft EIR is provided within this section.
- **Chapter 4 – Mitigation Monitoring Program (MMP).** This chapter includes the Mitigation Monitoring Program (MMP) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the *State CEQA Guidelines*.

1.4 REVIEW AND CERTIFICATION OF THE FINAL EIR

Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency prior to certification of the Final EIR. In addition, responses are also being distributed to all commenters via email. The Final EIR can be downloaded at: <https://planning.lacity.gov/development-services/eir>

1.5 SUMMARY OF THE PROPOSED PROJECT

The Proposed Project is an update of the existing Cornfield Arroyo Seco Specific Plan (CASP). The update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project would supersede the text, maps, and tables of the existing CASP, and will include the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), community plans, the Los Angeles Municipal Code (LAMC) Chapter 1 and Chapter 1A, specific plans, and other City ordinances.

The Proposed Project would strengthen the existing CASP’s affordable housing requirements, including the recalibration of the CASP’s existing incentive zoning system; establish a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; include provisions that facilitate the production of new 100% affordable housing and permanent supportive housing projects on public land; increase the zoning capacity for housing in targeted areas; and adopt a modernized zoning system based on the City’s new modular Zoning Code. The Proposed Project would also update the building form, urban design, open space, parking, conservation, performance, and sign standards of the existing CASP, including adopting standards in the new Zoning Code in lieu of those in the existing CASP, as necessary to support housing production and implement technical revisions that ensure consistency, clarity, and ease of implementation and reflect current and

future demographic, regulatory, environmental, and economic conditions. The Project Area boundaries would be revised to exclude parcels that currently do not contain zoning such as RD zones within the Project Area, or to exclude peripheral open space areas adjacent to Elysian Park in the Silver Lake-Echo Park-Elysian Valley Community Plan Area. The Proposed Project would retain the existing ministerial review process for subsequent qualifying development projects.

The purpose of the Proposed Project is to encourage the production of affordable, mixed-income, and permanent supportive housing in the Project Area, in a manner consistent with the underlying vision and purpose of the existing CASP.

Objectives of the Proposed Project are as follows:

- Increase the production of affordable, mixed-income, and permanent supportive housing within the Project Area.
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities.
- Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, foster community and belonging, and plan for a sustainable future.
- Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and economic insecurity.
- Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable housing developers; and
- While reducing overall employment capacity, preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, and new productive uses and employment spaces, such as light industrial and general commercial uses.

1.6 SUMMARY OF THE PROPOSED PROJECT IMPACTS

Section 15382 of the *State CEQA Guidelines* defines a significant impact on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance.” In order to approve a project with significant and unavoidable impacts, the lead agency must adopt a written Statement of Overriding Considerations (in accordance with Section 15093 of the *State CEQA Guidelines*) demonstrating that the decisionmaker has found that on balance the benefits of approving the Proposed Project outweigh the negative environmental consequences.

Project impacts found to be significant and unavoidable are the impacts to Air Quality due to exceedance of criteria air pollutant emission standards from construction and operation related emissions including nitrogen oxides (NOx), particulate matter (PM), and volatile organic compounds (VOCs); impacts to Cultural Resources due to the loss of historical resources; Noise impacts for temporary construction-related noise and construction-related ground vibration impacts; and impacts to Transportation and Traffic, specifically traffic safety impacts related to highway off-ramp queuing. Impacts found to be potentially significant but able to be reduced to a less than significant level with the imposition of proposed mitigation include Air Quality impacts to sensitive receptors from construction-related activities; Biological Resources impacts to birds or other special status species from construction activities; Cultural Resources impacts from ground-disturbing activities to archaeological resources; Geology and Soils impacts from ground-disturbing activities to

paleontological resources; Hazards and Hazardous material impacts resulting from contaminated soils; Tribal Resources impacts from unanticipated discovery of tribal cultural resources; and Utilities and Services impacts on water facilities and supply.

1.7 MODIFICATIONS AND TECHNICAL REFINEMENTS TO THE PROPOSED PROJECT

As a result of comments received on the Draft Environmental Impact Report (EIR) and through the Proposed Project's public hearing process during and following the September 2023 public hearing, and with recommended changes from the City Planning Commission (CPC), changes have been made to the text, tables, and maps of the Proposed CASP. As described below, the changes to the Proposed Project are found to make only minor changes to the overall project described in Chapter 3, Project Description have been analyzed in the EIR and this section discusses how the minor modifications to the Proposed Project do not result in significant new information under *State CEQA Guidelines* Section 15088.5 as a result of causing a new significant impact or substantial increase in the severity of an environmental impact. Although these changes do not constitute significant new information per CEQA, they remain subject to final adoption by the City Council and Mayor.

Proposed CASP (Specific Plan Document)

Based on comments received during and after the September 2023 public hearing and recommendations from the City Planning Commission during the December 14, 2023 public hearing, the following modifications and refinements have been made to the Proposed CASP specific plan document:

- **Chapter 1 (Introduction):**
 - Added clarification that the CASP Special District does not apply on lots located within the Freeway Special District ("FWY").
 - Revised Map 1-2 to denote the parcels subject to the FWY Special District and clarify that the Hybrid Industrial, Public Facilities, and Open Space General Plan Land Use Designations correspond with the CASP Special District.
- **Chapter 2 (Form):**
 - Revised Form Districts Map 2-1 to change where Form Districts CASP-FOR, CASP-FO1, CASP-FO2, and CASP FO-3 are applied for properties west of the Los Angeles River.
 - Revised Form Districts Table 2-1 to change the Bonus Floor Area Ratio (FAR) in Form Districts CASP-FOR and CASP-FO1 to 4.5 to be consistent with the Local Affordable Housing Incentive Program text in Chapter 7 (Community Benefits Program).
 - Revised Form Districts Table 2-1 to change the maximum story height to 7 stories in Form District CASP-FOR, compared to a maximum story height of 5 stories.
- **Chapter 3 (Frontage):**
 - Edited Frontage Districts Table 3-1 to correct a typographical error, changing the minimum planting area for River frontages from 75 feet to 75 percent.
- **Chapter 5 (Use):**
 - Revised Use Districts Map 5-1 to apply the Urban Village Use District to a three-acre block bound by Darwin Avenue, Avenue 20, North Main Street, and Avenue 19.

- Revised 5.D.2 and 5.E.2 to change the minimum non-residential floor area for a Dwelling or Live/Work use to 15 percent of floor area, with a minimum obligation of 0.5 FAR and a maximum obligation of 1.0 FAR.
- Revised 5.C.2, 5.D.2, and 5.E.2 to introduce additional limits on warehousing uses, outdoor storage, textile manufacturing, and motor vehicle uses; and to add a “CU2” Conditional Use Permit requirement for the sale of alcoholic beverages for on-site consumption or retail.
- **Chapter 7 (Community Benefits Program):**
 - Revised 7.B.1 to change the Bonus Floor Area from a 100 percent FAR increase to 4.5 FAR.
 - Added Section 7.B.2.c to add advertising requirements and criteria for new deed-restricted affordable units.
- **Chapter 8 (Streets):**
 - Revised Subarea 1 Street Map to replace Proposed Street Extension with Proposed Paseo for the segment of proposed Naud Street between Sotello Street and Mesnager Street.
 - Revised 8.B.4 to include specifications for Proposed Paseo and additional specifications for Proposed Street Extension, including minimum widths.

1.8 ENVIRONMENTAL IMPACTS OF MODIFICATIONS AND TECHNICAL REFINEMENTS TO THE PROPOSED PROJECT

The modifications and technical refinements to the Proposed Project include items such as:

- Edits to text, tables, and maps to improve clarity and to address typographical errors and internal consistency within the document.
- Modifications to the application of Form Districts, which include FAR, height, bulk, and massing standards, on specific parcels.
- Modifications to the application of Use Districts on specific parcels, along with changes to the allowable uses of each Use District to improve land use compatibility and Citywide consistency.
- Modifications to the Community Benefits Program to allow for greater Bonus Floor Area as part of the Local Affordable Housing Incentive Program.
- Refinements to street improvement requirements with additional design specifications, including new distinctions between a Proposed Paseo and a Proposed Street Extension.

The modifications would not result in notable physical changes with the potential to result in significant environmental impacts. Of the zoning and land use changes outlined above, the total acreage where the Form Districts have changed is approximately 3.5% of the total land area of the Project Area, while the total acreage where Use Districts have changed is approximately 0.5% of the total land area of the Project Area. Importantly, none of the above zoning changes resulted in increased Base FAR regulations that would result in substantial changes to building size or development. Further, it should be noted that while these changes occur at the parcel level, the overall reasonably expected development of the Project Area has not changed, either increased or decreased. As projects are developed and buildout of the Proposed Project occurs, it is unlikely that all parcels with identified land use changes will be redeveloped or that parcels will be redeveloped to the full potential that the proposed zoning allows. The proposed changes outlined above are intended to help increase the design flexibility and feasibility of individual projects but do not change the reasonably expected development at an

aggregate level, which is shaped by numerous factors such as physical site constraints, other zoning and building code regulations, public review processes, historical preservation goals and regulations, historical development patterns, land values, and market factors. The EIR for the Proposed Project identifies and discloses impacts for the entirety of the Project Area and does not identify any one parcel where impacts could occur, but rather identifies the types of impacts that could occur throughout the Project Area as build out of the Proposed Project occurs. Therefore, these modifications to the Proposed Project are found to not result in new significant impacts or a substantial increase in the severity of an impact identified in the DEIR and are found to not constitute significant new information for purposes of *State CEQA Guidelines* Section 15088.5.

2.0 CORRECTIONS AND ADDITIONS

As required by California Environmental Quality Act (CEQA) Guidelines Section 15088, this chapter provides corrections or clarifications of certain statements in the Draft Environmental Impact Report (DEIR). The correction(s) and/or addition(s) do not constitute significant new information, as defined by CEQA Guidelines Section 15088.5, because none would result in new significant impacts or a substantial increase in the severity of any impact already identified in the DEIR.

New information is not significant unless the DEIR changes in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project. Specifically, Section 15088.5(a) defines significant new information which requires recirculation to be any of the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043).

Corrections or information has been added to the DEIR pursuant to CEQA Guidelines Section 15132, as part of the preparation of the Final EIR (FEIR). Additions to the text of the DEIR are shown by underline and deletions from the text of the DEIR are shown by ~~striketrough~~ unless otherwise described. Where mitigation measures are replaced in their entirety with a new measure that mirrors a City Environmental Protection Measure (EPM), only the underlined replacement measure is provided herein; the measure from the DEIR that has been replaced is not shown in ~~striketrough~~ text. Where mitigation measures are replaced or revised, the replacement or revised measures are listed under the relevant impact section; however, the revisions also apply to mitigation measure listed in the *Executive Summary*.

As noted above, the following corrections and additions included herein involve minor modifications that clarify or amplify information contained in the DEIR and none would result in new significant impacts from those identified in the DEIR impact analysis or conclusions.

SECTION 4.2, AIR QUALITY

Page 4.2-28 – Revise Mitigation Measure 4.2-2 to read as follows:

4.2-2 Construction Emissions Reduction

~~The City shall require all projects that involve construction-related activity to comply with the following and require the developers to notify any contractors, and include in any agreements with contractors and subcontractors, the following, or equivalent, best management practices in construction specifications:~~

SECTION 4.3, BIOLOGICAL RESOURCES

Page 4.3-26 – Insert the following text after the fourth paragraph as follows:

Non-listed bat species, protected under CFGC, may occur within the Project Area in trees with exfoliating bark, tree hollows, broad leafed trees, palm fronds, bridges, hollow beams, attics, and eaves of buildings. Bats typically have a maternity season (generally from April 1 through August 31) and maternity roosts will be situated in areas to raise young. Depending on the species, some bats may not migrate and will use the same roost year-round. Additionally, bats may go into torpor (a temporary hibernation) during colder months (generally November to February) where bats may not be detectable while they are in deep sleep, making any potential relocations or evictions more challenging during this time frame. Many non-listed bat species are adapted to human disturbance and may roost throughout the Project Area. As such, tree trimming or removal as well as removal of structures with suitable crevices in the Project Area would have the potential to disturb a roosting bat, which could constitute a violation of the CFGC. In addition to direct impacts to roosting bats, temporary, indirect impacts including excessive noise or dust could affect bats. Therefore, impacts to active non-listed bats would be *potentially significant* before mitigation.

Page 4.3-27 – Revise Mitigation Measure 4.3-1 to read as follows:

For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include a review of biological resources with potential on the Project site and surrounding area. It will include a search of the California Natural Diversity Database (CNDDDB) and iNaturalist maps to determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or non-listed bat species. Species-specific surveys for sites that contain suitable habitat for protected species and non-listed bat species, and preparation of a report that includes an impact analysis with emphasis on identifying endangered, threatened, sensitive, regionally, locally unique species, and sensitive habitat, and potential direct, indirect, and cumulative biological impacts with specific mitigation measures necessary to avoid those impacts. If any observations of special status species and non-listed bat species are made during a biological resource assessment for individual projects, the biologist shall submit all observations of special status species and non-listed bat species to CNDDDB and all observations of special status plant populations or sensitive communities to CDFW's Vegetation Classification and Mapping Program within 90 calendar days of the observation.

SECTION 4.4, CULTURAL RESOURCES

Page 4.4-13 - Insert the following text after the last paragraph as follows:

William Mead Homes Site

In 2024, Rincon Consultants, Inc. prepared a cultural resources impacts assessment for the William Mead Homes site located within the Project Area (Appendix C – William Mead Homes Project Cultural Resources Impact Report). Totaling approximately 20 acres, the site is currently developed with William Mead Homes, a public housing complex that was

constructed in 1941-1942 and has been previously determined eligible for listing in the National Register of Historic Places (NRHP) with the California State Historic Preservation Officers (SHPO) concurrence. The assessment includes a California Historical Resources Information System (CHRIS) records search; a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search; background research including in-depth review of geotechnical, soil remediation, archival, academic, and ethnographic information; a review of past historical resources surveys, inventories, and previous historical resources evaluations of William Mead Homes; an archaeological and built environment pedestrian survey of the William Mead Homes site; an analysis of the sensitivity of the William Mead Homes site to contain archaeological resources; and an impacts assessment and recommended mitigation measures for archaeological and built environment resources.

The background research and field survey completed as part of the study confirmed the presence of one previously determined NRHP-eligible property within the William Mead Homes site. William Mead Homes has been determined eligible for listing in the NRHP under Criterion A for its association with the development of public and defense worker housing in Los Angeles during World War II, and under NRHP Criterion C as an excellent example of a Los Angeles public housing development that embodies the planning and design principles of the Garden City and Modern movements. SHPO concurred with the eligibility determination in 2002. Due to its formal determination of NRHP eligibility, the property is automatically listed in the California Register of Historical Resources (CRHR) and is considered a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

Page 4.4-33 – Revise the last paragraph to read as follows:

All discretionary projects that have the potential to impact historical resources must be individually reviewed by the Office of Historic Resources. While the Office of Historic Resources reports that it is extremely uncommon in the City to lose designated historical resources when a property owner has complied with the City's regulations, the Cultural Heritage Ordinance and the Building Code, it cannot prevent a property from being demolished or redeveloped or prevent structures from being altered. Rather these ordinances provide for processes, including environmental review, but they do not prohibit demolition. It is possible that demolition and/or significant alteration to some of the historical resources within the Project Area would occur during the life of the Proposed Project. For example, the Housing Authority of the City of Los Angeles (HACLA) is exploring the potential future redevelopment of housing on the William Mead Homes site, which is composed of one built environment historical resource, the William Mead Homes property. The resource was determined eligible for the NRHP, with SHPO concurrence, and is listed in the CRHR; the property therefore qualifies as a historical resource as defined by Section 15064.5(a) of the CEQA Guidelines (see Appendix C – William Mead Homes Project Cultural Resources Impact Report). Redevelopment of the William Mead Homes site, which could occur due to the Proposed Project, would result in the demolition of buildings and structures that contribute to the resource's eligibility for listing in the NRHP and CRHR. A project that may cause a substantial adverse change in the significance of a historic resource is one where the change would result in the significance of the resource being materially impaired. As such, the future redevelopment of the site would cause the material impairment of William Mead Homes, meaning it would alter in an adverse manner, those physical characteristics that convey its historical significance and that justify its inclusion in the NRHP and CRHR. Therefore, the Proposed Project's impacts related to historical resources would be potentially *significant and unavoidable*.

Page 4.4-34 – Revise the first paragraph to read as follows:

Mitigation Measures

If the contributing building and structures on the William Mead Homes site are demolished, HACLA will be required to implement the following Mitigation Measures.

4.4-1(a) Interpretive Display

HACLA, as lead agency and Applicant, shall retain a qualified historian or architectural historian meeting the Secretary of the Interior's Qualification Standards (NPS 1983) in coordination with the City of Los Angeles Office of Historic Resources to prepare content for an interpretive display in a portion of the project site which will be open to the public. The interpretive display shall be completed and installed prior to the issuance of occupancy permits for the new development. It shall include a brief history of William Mead Homes and present its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure 4.4-1(b). The Interpretive Display may be rotated amongst publicly accessible spaces located throughout the project site with approval by HACLA. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.

4.4-1(b) Informational Website

HACLA shall add to their existing website a section dedicated to the history of William Mead Homes and public housing in Los Angeles within six months of the issuance of a grading permit for the project. The website shall be maintained by HACLA and shall provide content on the history of William Mead Homes, the significance of public housing in the city, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the city. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history and shall be periodically updated, as needed, if new scholarly information related to the history or significance of William Mead Homes and public housing become available following the initial publishing of the website. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.

Significance After Mitigation

~~No feasible mitigation measures have been identified.~~ As discussed above, historical resources that are designated under HCM may be demolished if an applicant goes through the discretionary review process and prepares necessary environmental review. Resources included in 2011 Project Area Survey are not prohibited from demolition or alteration, provided they go through the appropriate process including environmental review. As a policy matter, the City finds that requiring additional review of projects otherwise undergoing discretionary review is undesirable based on the requirements it would place on City resources and the delay it would result in for projects. Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes on ministerial projects involving historical resources that are designated under the HCM or identified in the 2011 Project Area Survey. Based on the above, there is no feasible mitigation to prevent the demolition or

substantial alteration of historical resources. Mitigation Measures 4.4-1(a) and 4.4-1(b) above would serve to reduce historical resources impacts to the greatest extent feasible relative to the potential future redevelopment of the William Mead Homes site. However, even after mitigation, ~~Therefore,~~ impacts to historical resources, including the William Mead Homes site, from the Proposed ~~Project Plan~~ will remain *be significant and unavoidable*.

Page 4.4-35 – Revise the first paragraph of Mitigation Measure 4.4-2(a) to read as follows:

4.4-2(a) Archaeological Resources Evaluation and Avoidance/Recovery

CR1-1: Inadvertent Discovery

a. Applicability Threshold

Any Project that requires a permit for grading or excavation.

b. Standard

~~For any project that requires a permit for grading or excavation, if~~ If a possible archaeological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Archaeologist has been retained to evaluate the find in accordance with National Register of Historic Places and California Register of Historical Resources criteria. The Qualified Archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius.

Page 4.4-35 – Revise the first five paragraphs of Mitigation Measure 4.4-2(b) to read as follows:

4.4-2(b) Noticing

Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.

Archaeological, Paleontological, and Tribal Cultural Resources Notice: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:

~~Prior to issuance of a permit for grading or excavation all project applicants will receive notice and acknowledge receipt of the following notice:~~

~~Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:~~

- California Penal Code Section 622.5 provides the following: “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.”

- Public Resources Code Section 5097.5(a) states: “A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” A violation of Section 5097.5 is a misdemeanor subject to a fine up to \$10,000 and/or a year in jail, and potential restitution.
- ~~California Code of Regulations, Title 14, Section 4307 states: “No person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value.” Section 1427 “recognizes that California’s archaeological resources are endangered by urban development and population growth and by natural forces...Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archaeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor. It is a misdemeanor to alter any archaeological evidence found in any cave, or to remove any materials from a cave.”~~

Page 4.4-37 – Revise the first two paragraphs of Mitigation Measure 4.4-2(c) to read as follows:

4.4-2(c) Zanja Madre

CR2-1: Zanja Madre HAER Documentation

a. Applicability Threshold

Any project that requires a permit for grading or excavation and that is located within one mile of the currently known and mapped segments of the Zanja system.

b. Standard

Projects within 500 feet of the currently mapped known segments of the Zanja system (see Appendix F) have increased likelihood of encountering segments of the Zanja system during construction. The Zanja system includes the Zanja Madre and its outbranching secondary Zanja segments. If possible, segments of the Zanja system are uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a qualified archaeologist has been retained to inspect and evaluate the find. The qualified archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius.

SECTION 4.6, GEOLOGY AND SOILS

Page 4.6-3 – Revise the paragraph under *Project Area Liquefaction* as follows:

The majority of the Project Area is located in a liquification zone and would be subject to earthquake induced liquification. In particular, according to the California Department of Conservation (DOC), California Geological Survey (CGS) unit, the Project Area is situated

within the Los Angeles Liquefaction Zone¹. According to CGS, their maps are used by cities and counties to regulate development and by property owners selling property within areas where seismic hazards zones have been identified. The maps helps digitally illustrate areas where liquefaction and landslides may occur during a strong earthquake.

Page 4.6-5 – Revise the paragraph under *Project Area Landslides* as follows:

According to the Los Angeles Seismic Hazard Map, there are no landslide zones in the Project Area. However, sections of slope on Elysian Park directly bordering the northern portion of the ~~Plan~~ Project Areas ~~are~~ is relatively steep and may be subjected to instability and are designated as landslide zones by CGS. According to CGS and the DOC, minimal portions of the Project Area contain mapped Landslide Zones, which are used by cities and counties to regulate development.² In this case, the Project Area contains portions of the Los Angeles Landslide Zone, especially those areas near the Interstate-10 freeway.

Page 4.6-27 – Revise Mitigation Measure 4.6-6(b) in its entirety to read as follows:

4.6-6(b) Treatment of Paleontological Resources

CR3-1: Inadvertent Discovery

a. Applicability Threshold

Any Project that requires a permit for grading or excavation.

b. Standard

If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.

Page 4.6-27 – Revise Mitigation Measure 4.6-6(c) in its entirety to read as follows:

¹ <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>

² <https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-landslide-zones-doc-hosted/about>

Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.

Archaeological, Paleontological, and Tribal Cultural Resources Notice: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:

- California Penal Code Section 622.5 provides the following: “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.”
- Public Resources Code Section 5097.5(a) provides: “A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” A violation of Section 5097.5 is a misdemeanor subject to a fine up to \$10,000 and/or a year in jail, and potential restitution.

The following best practices are recognized by paleontologists and environmental consultants to ensure paleontological resources are not damaged during construction or Ground Disturbance Activities:

- A paleontological resources records search shall be requested from and conducted by the Natural History Museum of Los Angeles County to determine whether any paleontological resources have been previously identified on or near the Project site. The results of this records search shall be used as an indicator of the paleontological sensitivity of the Project site.
- A Qualified Paleontologist shall be retained and use all reasonable methods, consistent with professional standards and best practices, to determine the potential for paleontological resources to be present on the Project site.
- If the Qualified Paleontologist determines there is a high potential that paleontological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor shall observe all Ground Disturbance Activities within those areas identified as having an undetermined or high potential in order to identify any resources and avoid potential impacts to such resources. In the event of a possible paleontological discovery, the Qualified Paleontologist or Paleontological Monitor shall have the authority to temporarily halt earthwork activities within an appropriate radius of the find, as determined by the Qualified Paleontologist, necessary to protect the resource or other potential resources on or near the Project site. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment.
- Prior to the start of construction, the Qualified Paleontologist or his/her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.

- If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work should cease in the area of the find until a Qualified Paleontologist has evaluated the find in accordance with federal, state, and local guidelines, including the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP, 2010).
- If fossils are discovered, a Qualified Paleontologist shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist has the authority to temporarily direct, divert or halt construction activity to ensure the fossil(s) can be removed in a safe and timely manner. Handling and disposition of fossils is done at the direction and guidance of a Qualified Paleontologist.
- Personnel of the Project should not collect or move any paleontological materials or associated materials.
- If cleared by the Qualified Paleontologist, construction activity may continue unimpeded on other portions of the Project site.
- Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Qualified Paleontologist, and the Qualified Paleontologist clears the site for construction activity.

SECTION 4.8, HAZARDS AND HAZARDOUS MATERIALS

Page 4.8-44 – Revise Mitigation Measure 4.8-4(a) in its entirety to read as follows:

4.8-4(a) Database Review, Investigation, and Remediation

HM1-2:Environmental Site Assessment

a. Applicability Threshold

Any Project that requires a grading, excavation, or building permit from LADBS and which is:

- Located on or within 500 feet of a Hazardous Materials site listed in any of the following databases:
 - State Water Resources Control Board GeoTracker (refer to <https://geotracker.waterboards.ca.gov/>);
 - DTSC EnviroStor (refer to <https://www.envirostor.dtsc.ca.gov/public/>);
 - DTSC Hazardous Waste Tracking System (refer to <https://hwts.dtsc.ca.gov/>);
 - LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at <https://www.lafd.org/fire-prevention/cupa/public-records>);
 - Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California

Accidental Release Prevention inventory lists at <https://fire.lacounty.gov/public-records-requests>);

- SCAQMD Facility Information Detail (refer to <https://xappprod.aqmd.gov/find>); or
- Located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at <https://enviro.epa.gov/index.html>); or
- Located in an Oil Drilling District (O) or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by the California Geologic Energy Management Division (refer to <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>); or
- Located on land currently or previously designated with an industrial use class or industrial zoning, in whole or in part; or
- Located on land currently or previously used for a gas station or dry cleaning facility.

Or:

- The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station or dry cleaner.

And:

- The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or site conditions.

b. Standard

A Phase I Environmental Site Assessment shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials' (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.

If the Phase I identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I, a Phase II Environmental Site Assessment shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II Environmental Site Assessment(s) shall be maintained pursuant to the proof of compliance requirements in Section I.D.6 and made available for review and inclusion in the case file by the appropriate regulatory agency, such as the State Water Resources Control Board, the State Department of Toxic Substances Control, or the LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II Environmental Site Assessment or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the

remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.

SECTION 4.11, NOISE

Page 4.11-24 – Revise Mitigation Measure 4.11-1 in its entirety to read as follows:

4.11-1 Project-Specific Noise Study

NV1-6: Noise Study

a. Applicability Threshold

Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS; are located within 500 feet of Noise-Sensitive Uses; and have one or more of the following characteristics:

- Two or more subterranean levels;
- 20,000 cubic yards or more of excavated material
- Simultaneous use of five or more pieces of construction equipment; or
- Construction duration (excluding architectural coatings) of 18 months or more.

Or any Project whose construction activities involve impact pile driving or the use of 300 horsepower equipment.

b. Standard

A Noise Study prepared by a Qualified Noise Expert shall be required and prepared prior to obtaining any permit by LADBS. The Noise Study shall characterize expected sources of earthwork and construction noise that may affect identified Noise-Sensitive Uses, quantify expected noise levels at these Noise-Sensitive Uses, and recommend measures to reduce noise exposure to the extent noise reduction measures are available and feasible, and to demonstrate compliance with any noise requirements in the LAMC. Specifically, the Noise Study shall identify noise reduction devices or techniques to reduce noise levels in accordance with accepted industry practices and in compliance with LAMC standards. Noise reduction devices or techniques shall include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. The Noise Study shall identify anticipated noise reductions at Noise-Sensitive Uses associated with the noise reduction measures. Applicants and Owners shall be required to implement and comply with all measures identified and recommended in the Noise Study. The Noise Study and copies of any contractor agreements shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.

Page 4.11-27 – Revise Mitigation Measure 4.11-2(a) in its entirety to read as follows:

4.11-2(a) Vibration Control Plan

NV2-1: Baseline Survey and Vibration Control Plan

a. Applicability Threshold

Any Project, with the exception of Projects limited to the construction of 2,000 square feet or less of floor area dedicated to residential uses, whose earthwork or construction activities: (1) involve the use of construction equipment, including Heavy Construction Equipment, that produces 0.12 PPV or more of vibration at a distance of 25 feet (see reference vibration levels in Appendix F); (2) require a permit from LADBS; and (3) which occur:

- Within 25 feet of any building extremely susceptible to vibration damage, including unreinforced masonry buildings, tilt-up concrete wall buildings, wood-frame multi-story buildings with soft, weak or open front walls, and non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey; or
- Within 15 feet of non-engineered timber and masonry buildings.

Or any Project whose construction activities involve the use of pile drivers within 135 feet of any building extremely susceptible to vibration damage, including existing unreinforced masonry buildings, existing tilt-up concrete wall buildings, existing wood-frame multi-story buildings with soft, weak or open front walls, and existing non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey.

b. Standard

Prior to demolition, grading/excavation, or construction, a Qualified Structural Engineer shall prepare a survey establishing baseline structural conditions of potentially affected structures and a Vibration Control Plan, which shall include methods to minimize vibration, including, but not limited to:

- A visual inspection of the potentially affected structures to document (by video and/or photography) the apparent physical condition of the building (e.g., cracks, broken panes, etc.).
- A shoring design to protect the identified structures from potential damage;
- Use of drilled piles or a sonic vibratory pile driver rather than impact pile driving, when the use of vibrating equipment is unavoidable;
- Use of rubber-tired equipment rather than metal-tracked equipment; and
- Avoiding the use of vibrating equipment when allowed by best engineering practice.

SECTION 4.16, TRIBAL CULTURAL RESOURCES

Page 4.16-6 – Revise the first paragraph of Mitigation Measure 4.16-1(a) to read as follows:

4.16-1(a) Unanticipated Discovery of Tribal Cultural Resources

CR4: Inadvertent Discoverya. Applicability ThresholdAny Project that requires a permit for grading or excavation.b. StandardIf a possible tribal cultural resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Tribal Monitor or Archaeological Monitor has been retained to evaluate the find.~~If a possible tribal cultural resource is uncovered during earthwork or construction related to any project that requires a permit for grading or excavation, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Tribal Monitor or Archaeological Monitor has been retained to evaluate the find.~~

Page 4.16-7 – Revise the first five paragraphs of Mitigation Measure 4.16-1(c) to read as follows:

4.16-1(c) Notices for Non-Discretionary Projects

Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.Archaeological, Paleontological, and Tribal Cultural Resources Notice: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:~~All projects that are seeking excavation or grading permits, prior to issuance of a permit for grading or excavation, the Department of Building and Safety shall issue the following notice and obtain a signed acknowledgement that the notice was received and read by the applicant and owner.~~~~Several federal and State laws regulate the treatment of tribal resources and make it a criminal violation to destroy those resources. These include, but are not limited to:~~

- California Penal Code Section 622.5 provides the following: “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.”
- Public Resources Code Section 5097.5(a) states: “A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” A violation of Section 5097.5 is a misdemeanor subject to a fine up to \$10,000 and/or a year in jail, and potential restitution.
- ~~California Code of Regulations, Title 14, Section 4307 states: “No person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value.” Section 1427 “recognizes that California’s archaeological resources are endangered by urban development and population growth and by natural~~

~~forces...Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archaeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor. It is a misdemeanor to alter any archaeological evidence found in any cave, or to remove any materials from a cave."~~

SECTION 5.5, COMPARATIVE IMPACT ANALYSIS

Page 5-7 – Revise a sentence in the last paragraph to read as follows:

Under the Proposed Project, implementation of Mitigation Measures 4.4-1(a), and (b) ~~and (c)~~ would reduce the potential to disturb historic resources and 4.4-2(a), (b), and (c) and (d) would reduce the potential to disturb archaeological resources and human remains.

Page 5-19 – Revise a sentence in the second paragraph to read as follows:

Under the Proposed Project, implementation of Mitigation Measures 4.4-1(a), and (b) ~~and (c)~~ would reduce the potential to disturb historic resources and 4.4-2(a), (b), and (c) and (d) would reduce the potential to disturb archaeological resources and human remains.

Page 5-30 – Revise a sentence in the second paragraph to read as follows:

Under the Proposed Project, implementation of Mitigation Measures 4.4-1(a), and (b) ~~and (c)~~ would reduce the potential to disturb historic resources and 4.4-2(a), (b), and (c) and (d) would reduce the potential to disturb archaeological resources and human remains.

SECTION 5.6, ALTERNATIVES CONSIDERED BUT REJECTED

Page 5-7 – Revise the section to read as follows:

Section 15126.6 (c) of the *CEQA Guidelines* requires that an EIR identify those alternatives that were considered but rejected by the lead agency because they either did not meet the objectives of the project, were considered infeasible, or would not avoid or substantially lessen one or more significant effects of the Proposed Project.

Two additional alternatives, Alternative 4 and Alternative 5, were considered that focus on reducing significant impacts to Cultural Resources should there be future redevelopment of housing at the William Mead Homes site, but the alternatives were rejected as both were considered infeasible:

Alternative 4 – Historical Rehabilitation

Under this alternative, any future work on the William Mead Homes site in the Project Area would be required to be performed in conformance with the Secretary of Interior (SOI) Standards for Rehabilitation and the California Historical Building Code (CHBC).

To rehabilitate the existing buildings, significant interior and exterior repairs would be undertaken by professionals experienced in historic buildings. Replacing in-wall plumbing and electrical systems as well as foundation bolting would require opening up all interior walls and most floors. Exterior porches and eaves would be repaired in most cases and where replacement was required, original details would be matched in kind. Original windows (where remaining) would be retrofitted and/or reglazed to provide better insulating, air infiltration and acoustic performance. Where original windows are missing, new windows

would be installed that match the original materials and profiles. Floors containing asbestos are not considered character-defining and could be removed and replaced. Lead paint on the exterior of the building could be encapsulated or gently removed without damaging the overall integrity of walls. If structural work was required at exterior walls, the design would be carried out so as to maintain historic fabric, overall massing and details as much as possible.

Outside building footprints, the blocks are landscaped with lawns, mature trees of various species, and various ornamental plants. Landscaped areas are interspersed with concrete walkways and concrete-paved areas with common clothes lines. All of these features would be retained under this alternative but would require additional site work and cleanup.

Also, achieving required accessibility modifications would require exterior site work and substantial interior remodeling at the affected units. These types of repairs would need to be achieved without affecting character-defining features, which are largely located in its exterior details, overall massing, and site arrangement.

From a constructability standpoint, it is feasible to accomplish the required repairs to the William Mead Homes site in conformance with the SOI Standards for Rehabilitation per the Alternative 4 – Historical Rehabilitation description above.

However, from a regulatory standpoint, modifying the existing buildings to provide the number of code-required mobility accessible units is not feasible, as it does not meet Title 24 Section 8.26, which stipulates that in order to avoid discrimination, accessible units must be distributed throughout projects and sites with “a sufficient range of sizes and amenities” to provide the same choice to all people regardless of their abilities. Within the two- and three-bedroom units, renovations required to meet mobility access regulations would require complete internal reconfiguration and significant diminishment of normal, usable space. With no accessible two- or three-bedroom units, or with significantly diminished accessible two- and three-bedroom units, the site would not meet this requirement, thus exposing the designer and operator to significant legal liability even if the project made it through permitting. Generally speaking, units with accessibility modifications would be substandard based on normally accepted design standards for unit livability. No kitchen or bathrooms currently meet City, State or Federal accessibility standards for clearances, and alterations required to comply with the accessibility standards under Alternative 4 – Historical Rehabilitation would significantly negatively impact the livability of the units. As such, Alternative 4 was rejected due to infeasibility.

Alternative 5 – Partial Preservation

Under this alternative, various portions of the William Mead Homes site would be preserved and rehabilitated in compliance with SOI Standards. The site would be demolished in phases and redeveloped with new improved multi-family housing and amenities. Portions of the existing buildings would be maintained and improved with additional housing units and residential amenities.

There would be a total of 890 residential units on the site, including 769 affordable units and 121 units that would be preserved under this alternative. In addition, roughly 256,523 square-feet of non-residential uses would also be developed, which includes residential support uses and general amenities.

As stated previously, rehabilitation of historic structures on the William Mead Homes site is feasible from a constructability standpoint. Also, demolishing a particular portion of the William Mead Homes site and constructing new buildings is also feasible by the same measure. However, from a regulatory standpoint, demolishing a significant portion of a historic resource is not feasible in accordance with SOI Standards. In addition, this alternative would struggle to meet Title 24 Section 8.26 that requires mobility accessible units to be distributed throughout the site and with “a sufficient range of sizes and amenities” to provide the same choice to all people regardless of their abilities.

Newly constructed accessible units would exceed the quality and livability of those provided in the modified existing buildings, or alternatively all accessible units would be provided in the newly constructed portion of the site, thus, not meeting equitability and site distribution requirements stipulated by federal funding sources. As such, Alternative 5 was rejected due to infeasibility.

No other alternatives were identified that would feasibly attain most of the basic project objectives but would also avoid or substantially lessen the significant effects of the Proposed Project. Outside of a complete moratorium on new development, none of the impacts could be reduced to below a level of significance. Any demolition or construction activity in the Project Area would have the potential to adversely affect historical resources or generate significant construction-related noise. Moreover, as previously noted, limiting development in the Project Area may simply divert more growth and development to other areas of the City, thus increasing the potential for similar impacts in other areas and increasing overall Citywide and regional VMT and associated air pollutant and GHG emissions.

SECTION 6.0, OTHER CEQA SECTIONS

Page 5-7 – Revise the fifth paragraph to read as follows:

Mitigation Measures 4.4-1(a), and (b) ~~and (c)~~ would ensure that historic resources are identified and treated appropriately to avoid or minimize potential impacts. Mitigation Measures 4.4-2(a), 4.4-2(b), and 4.4-2(c), would provide for the recovery of any significant archaeological resources that cannot be preserved in place. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

3.0 RESPONSES TO COMMENTS ON THE DEIR

This section includes comments received during the circulation of the Draft Environmental Impact Report (DEIR) prepared for the Cornfield Arroyo Seco Specific Plan (“CASP”) Update hereafter referred to as “Proposed Project”.

The comment letters, included in Appendix B, were submitted to the City of Los Angeles by public agencies and private citizens. Responses to written comments received have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the DEIR addresses pertinent environmental issues. Any changes made to the text of the DEIR correcting information, data, or intent, other than minor typographical corrections or minor working changes, are noted in Chapter 2, *Corrections and Additions*.

The DEIR was circulated for a 61-day public review period that began on July 20, 2023 and ended on September 18, 2023. The City of Los Angeles received eight comment letters during the DEIR public review period. Of these, seven letters included comments on the DEIR and one letter was a request for additional information and did not contain any comments on the DEIR or Proposed Project. An additional two letters on the DEIR were received after the review period for a total of 10 letters received.

The original bracketed comment letters are provided followed by a numbered response to each bracketed comment. Individual comments within each letter are numbered and the response is given a matching number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1-1, for example, indicates that the response is for the first issue raised in comment Letter No. 1). Table 3-1 lists the comments received on the DEIR.

Table 3-1 List of Commenters on the DEIR

Letter No. and Commenter	
1	Sahar Ghadimi, Air Quality Specialist, CEQA IGR, South Coast Air Quality Management District
2	Brian Olson, Senior Engineering Geologist, Seismic Hazards Program, California Geological Survey
3	Sissy Trinh and Jonathan Jager, Southeast Asian Community Alliance (SEACA)
4	Cassie Truong, Senior Transportation Planner, Los Angeles County Metropolitan Transportation Authority (Metro)
5	Rowena Lau, Division Manager, Wastewater Engineering Services, LA Sanitation and Environment (LASAN)
6	Katherine Rubin, Director of Corporate Environmental Affairs, Los Angeles Department of Water and Power (LADWP)
7	Chinatown Community for Equitable Development
8	Jennifer Turner acting for David Mayer, Environmental Program Manager South Coast Region, California Department of Fish and Wildlife (CDFW)
9	Jenny Scanlin, HACLA, Chief Development Officer
10	Sam Wang, Air Quality Specialist, CEQA IGR, South Coast Air Quality Management District

3.1 SUMMARY OF COMMENTS AND RESPONSES

LETTER NO. 1

Sahar Ghadimi, Air Quality Specialist, CEQA IGR, South Coast Air Quality Management District (SCAQMD)

August 2, 2023

Response 1-1

The commenter states that SCAQMD staff are in the process of reviewing the DEIR.

This comment is noted.

Response 1-2

The commenter requests an electronic copy of any live modeling and emissions calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e., truck operations)

The above requested files were provided to SCAQMD electronically on August 9, 2023.

Response 1-3

The commenter states that the requested files may be sent via a Dropbox link by the end of the week. The commenter notes that without all files and supporting documentation, SCAQMD will be unable to complete a review of the air quality analyses in a timely manner and that delays in providing the supporting documentation will require additional time for review beyond the end of the comment period.

The requested information was sent to SCAQMD via email on August 9, 2023. No further requests for information were received from SCAQMD.

LETTER NO. 2

Brian Olson, Senior Engineering Geologist, Seismic Hazards Program, California Geological Survey (CGS)

August 17, 2023

Response 2-1

The commenter states that the DEIR discusses liquefaction and landsliding as a potential seismic hazard. The comment mentions much of the project area is in “a liquefaction zone” (page 4.6-3) and the slopes bordering the northern edge of the project area are “designated as landslide zones” (page 4.6-5); however, it is not clear what the source of these zones are. The commenter states the City should supplement this section with a discussion of the existing Earthquake Zones of Required Investigation (EZRI) for both liquefaction and earthquake-induced landsliding established by CGS for this area and consider providing figures depicting the locations of both types of zones. The commenter provides links for CGS maps and data. The commenter also states that cities and counties affected by EZRI must regulate certain development projects within them. The Seismic Hazards Mapping Act (1990) also requires sellers of real property (and their agents) within a mapped hazard zone to disclose that the property lies within such a zone at the time of sale.

See Chapter 2, *Corrections and Additions*, of this FEIR for revisions made to Section 4.6, *Geology*, of the DEIR (pages 4.6-3 through 4.6-6). These revisions provide additional detail regarding the source of information on liquefaction and landslide hazard zones within the Project Area including maps produced by CGS. These changes do not affect the DEIR analysis or impact conclusions, which remain less than significant. Additionally, the requirements of the Seismic Hazards Mapping Act (1990) are already discussed on page 4.6-15 of the DEIR.

Response 2-2

The commenter suggests that the City consider providing a discussion of the probability of large earthquakes in the region and that the discussion include earthquake probabilities from the third Uniform California Rupture Forecast model. The commenter is referred to Section 4.6, *Geology and Soils*, Pages 4.6-2 and 4.6-3 of the Draft EIR, for information on seismic hazards including surface rupture, groundshaking, liquefaction, and lateral spreading. Additionally, Page 4.6-19, of the Draft EIR, discusses potential impacts related to Project implementation as it relates to earthquakes.

The commenter also suggests that the proposed Specific Plan update discussion include earthquake probabilities from a third-party software provider. The aforementioned computer model provides estimates of the magnitude, location, and time-averages frequently of potentially damaging earthquakes in California. The time-independent model is strictly for informational purposes only and does not provide an accurate prediction of an earthquake event. The United States Geological Survey states that the computer model will be used by insurance companies to accurately predict premiums and overall level of insurance provided. While the model is useful for those purposes, the City does not feel that providing a prediction of an event that may never happen is appropriate with regard to this environmental analysis. Additionally, the commenter has not explained how the use of the computer model would result in a different impact conclusion.

LETTER NO. 3

Sissy Trinh and Jonathan Jager, Southeast Asian Community Alliance (SEACA)

September 18, 2023

Response 3-1

The commenter introduces SEACA and its mission, and notes that its members living in the area would be affected by the Proposed Project.

This comment is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 3-2

The commenter provides an overview of the purpose of and CEQA requirements for EIRs.

This comment is noted. No further response is required.

Response 3-3

The commenter states that the DEIR's less-than-significant conclusions regarding displacement lack sufficient evidence, and that a potentially significant impact related to displacement of existing CASP residents would occur. The comments following this statement further elaborate on this assertion.

As illustrated in the responses that follow, the DEIR's conclusions that impacts related to displacement would be less than significant are supported by substantial evidence.

Response 3-4

The commenter states that the DEIR does not adequately consider the risk of current CASP residents being displaced. The commenter notes that the DEIR states that displacement of some existing residences is reasonably foreseeable and concludes that the increased capacity for housing under the Proposed Project would offset such impacts. The commenter states that this may be true in the long run but ignores the time horizon of displacement.

The DEIR is a programmatic EIR for an update to the existing CASP. No specific development plans are included as part of the Project, and the Project would not require any existing housing to be demolished or reduced in order to be consistent with the Proposed Project's land use designations and zoning. In effect, existing development on the ground could be maintained and established uses could continue to operate. Nonetheless, the DEIR acknowledges that limited redevelopment of multi-family structures may occur due to the Proposed Project, which could result in displacement of some housing units and residents during construction. In limited instances, the Proposed Project could potentially cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated or expanded. As noted in Section 4.12, *Population, Housing and Employment*, of the DEIR, the number of displaced units and residents, the timing of such activities, and locations of any replacement housing, if needed, is too speculative to determine.

While the EIR acknowledges that some displacement of existing housing units is likely to occur in the short-term, the analysis also notes that the City has adopted a number of policies aimed specifically at minimizing displacement of affordable housing, that the CASP Update would result in an overall

increase in housing, including affordable housing, available in the Project Area, and that therefore displacement of housing requiring construction of new housing elsewhere to replace the displaced housing is not anticipated. As noted on page 4.12-17 of the DEIR:

Loss of affordable housing and displacement of low-income renters is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact (*Porterville Citizens v. City of Porterville*). Based on this, an impact from loss of affordable housing and displacement in this EIR will be an impact if it results in a physical impact to the environment, such as from construction of new housing elsewhere.

The Proposed Project is specifically aimed at accommodating current and anticipated housing demand as well as changing demographics in the Project Area. Although the number of existing units (including affordable units) that might be displaced by future development cannot be predicted with any degree of certainty, the Proposed Project would increase the reasonably expected development of housing in the Project Area by 900 percent (18,000 units), and thus there would be no need to construct new housing elsewhere. Therefore, the DEIR's conclusion that environmental impacts related to displacement of residences and the need to build new housing elsewhere would be less than significant remains valid.

Response 3-5

The commenter states that the DEIR does not adequately consider the potential for the Project to physically divide an established community.

As discussed on pages 4.10-20 and 4.10-21, the Proposed Project does not include major transportation infrastructure or alterations to roadways that would physically divide the Project Area, nor would the revised zoning under the Proposed Project result in substantially altered land use development patterns or increased development of incompatible uses that could divide the community. None of the permitted land uses under the Proposed Project would involve physical barriers, such as large, fenced areas, that would divide the community. The commenter does not provide any specific reasons that the Project would result in the physical division of communities within the Project Area and provides no substantial evidence supporting the need for a revised analysis or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response 3-6

The commenter states that the DEIR's analysis is inadequate because it ignores the actual human impact of displacement and that it is not appropriate to claim that displacement will not exist simply because of a net gain in housing units or because communities will have more access to each other. The commenter claims that if current residents are forced out of their homes for any period of time, that creates potentially significant impacts on Land Use and Housing. The commenter also states that displacement of existing residents will physically divide an established community and that displacement, whether temporary or permanent, causes spillover effects that implicate other environmental areas of concern in ways that this DEIR does not address.

The DEIR does not claim that the Proposed Project will not cause any displacement. As stated on page 4.12-20 of the DEIR, "...reasonably anticipated development from the Proposed Project is anticipated to result in redevelopment that has the potential to result in the displacement of some existing housing units and residents" and as stated on page 4.12-21 of the DEIR, "displacement of some residences is a reasonably foreseeable result of development or redevelopment that could occur under the Proposed Project, should a property owner decide to utilize the full development potential of their site." Although

some displacement is reasonably anticipated to occur, as addressed above under Responses 3-4 and 3-5 and below under Responses 3-8 through 3-10, the Proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, nor would the project divide an established community. This comment provides no substantial evidence supporting the need for a revised analysis in the Land Use or Population, Housing, and Employment Sections or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response 3-7

The commenter states that existing state and local right of return and relocation laws do not stop displacement, that these laws merely give residents the opportunity to not be displaced, and that relocation services often do not actually provide the support residents need or prioritize relocating tenants within or in close proximity to their existing residences. The commenter states that the DEIR should be revised to conclude that the Project's cumulative impacts on Land Use and Planning and Population, Housing, and Employment are "potentially significant."

As described in Responses 3-4 through 3-6 and 3-8 through 3-10 that explain the relevant Project attributes, appropriate CEQA analysis required, allowable land uses, and applicable existing laws and policies, the DEIR's conclusions regarding the Project's less than significant impacts related to displacement (Planning and Population, Housing, and Employment) and division of an established community (Land Use and Planning) are supported with substantial evidence. Cumulative impacts related to these topics are described on pages 4.12-24 and 4.10-35 of the DEIR, respectively, and as addressed therein, the Proposed Project would not result in significant cumulative impacts related to these issues. This comment provides no substantial evidence supporting the need for a revised cumulative analysis in the Land Use or Population, Housing, and Employment Sections or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response 3-8

The commenter states that displacement caused by the Proposed Project could result in potentially significant impacts to transportation, greenhouse gas (GHG) emissions, air quality, and recreation. The commenter highlights potential secondary impacts of displacement, including additional vehicle miles traveled (VMT) and associated GHG and air pollutant emissions. For this reason, the commenter states that the DEIR's conclusion that the Proposed Project's impacts on displacement are less than significant is incorrect and the Proposed Project must include measures to mitigate these potentially significant impacts on displacement.

The growth forecasts used in the DEIR consider the effects of any displacement that may occur as a result of implementation of the CASP Update insofar as they represent the projected net increase in housing units, population, and jobs expected through 2040. The DEIR analyzes the total net increase in emissions of air pollutants and GHGs in Sections 4.2, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*, respectively, considering the vehicle miles traveled (VMT) changes described in Section 4.15, *Transportation and Traffic*. As noted in Section 4.15, *Transportation and Traffic*, VMT forecasts utilize the City of Los Angeles Travel Demand Forecasting (TDF) Model and a Project Area Travel Demand Forecasting (TDF) Model for the analysis of the 2021 baseline year and the future 2040 scenario, as well as the use of the SCAG TDF Model for the analysis of the SCAG RTP/SCS to represent the region. These models all consider the synergistic effects of growth, including in a general sense the effects of redeveloping properties over time. While Section 4.12, *Population, Housing and Employment*, of the DEIR (Impact 4.12-2) acknowledges that some displacement of existing housing

units is likely to occur, the analysis also notes that the City has adopted a number of policies aimed specifically at minimizing displacement of affordable housing, that the Proposed Project would result in an overall increase in housing, including affordable housing, available in the Project Area, and that therefore displacement of housing requiring construction of new housing elsewhere to replace the displaced housing is not anticipated. For these reasons, although the air quality and GHG analyses consider displacement generally, any attempt to predict with any greater degree of certainty which affordable housing units might be displaced through 2040 and where displaced residents may live would be speculative. However, the Proposed Project is expected to provide more housing near areas well-served by public transit and areas where walking and biking are encouraged, thus having the overall effect of reducing VMT and associated per capita emissions of air pollutants and GHGs. As discussed in Section 4.2, *Air Quality*, future daily regional emissions associated with implementation of the Proposed Project are generally expected to decrease relative to existing conditions due largely to improvements in vehicular engine efficiency technologies and fuel pollutant concentrations, resulting from more stringent statewide regulations, that are projected to occur between existing conditions and 2040. Furthermore, Section 4.7, *Greenhouse Gas Emissions*, discusses how implementation of the Proposed Project would result in a 74 percent decrease in per capita GHG emissions due to a combination of state-mandated GHG emission reduction strategies as well as a lower service population VMT resulting from the location of jobs and housing being in close proximity to each other and the creation of substantial opportunities to use transit or other active transportation modes.

With respect to mitigation, the analysis of regional air quality impacts concludes that the Proposed Project's impact would be significant and unavoidable that mitigation beyond the Proposed Project's focus on mixed use and transit-oriented development and adherence to the City's green building standards on all new development is not feasible. For GHGs, significant impacts have not been identified; therefore, mitigation is not required. The Proposed Project outlines several anti-displacement measures, such as the Community Benefits Program to generate affordable housing in new development for all income levels within the Project Area. Future development projects using the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with Assembly Bill (AB) 2222. Additionally, all new development in the Project Area will remain subject to the Affordable Housing Linkage Fee program. This program disincentivizes the loss of affordable units by requiring an additional fee if existing housing units are lost. A number of City regulations that are currently in place to minimize displacement of residents will continue under the Proposed Project, including:

- The citywide Residential Hotel Unit Conversion and Demolition Ordinance (RHO) offers protections for preservation of existing residential hotels and tenant rights and prohibits conversion or demolition of dwelling units in a residential hotel without approval from LAHD.
- The citywide Rent Stabilization Ordinance is intended to safeguard tenants from excessive rent increases. The Rent Stabilization Ordinance regulates replacement of demolished units, allowable rent increases, registration of rental units, legal reasons for eviction, and the causes for eviction requiring relocation assistance payment to tenants. Properties that contain two or more units, have a Certificate of Occupancy prior to October 1, 1978, and replacement units under LAMC Section 151.28 are subject to this ordinance.
- Proposition JJJ requires that all development projects of 10 or more residential units that require changes to the General Plan or other zoning make a percentage of the units affordable to low-income and working residents or pay a fee to fund affordable housing and enforce laws that protect renters.

The City's Housing Element also includes a range of policies aimed at protecting and developing affordable housing. Finally, the State has adopted a number of bills aimed at protecting and developing

affordable housing over the past several years. Notably, SB 330, the Housing Crisis Act, tightens the protections for development projects by limiting a jurisdiction's ability to change development standards and zoning applicable to the project once a preliminary application is submitted. The Proposed Project seeks to preserve the affordability of existing housing stock and minimize displacement. Projects using Density Bonus Law, or the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with AB 2222. Additionally, the Housing Crisis Act of 2019, as amended by SB 8 (California Government Code Section 66300 et seq.), prohibits the approval of any proposed housing development project on a site that will require demolition of existing dwelling units or occupied or vacant "Protected Units" unless the project replaces those units at rents affordable to lower income tenants. These provisions will result in the retention of existing affordable units and a net gain of additional affordable units in the transit-rich areas of the Project Area. Therefore, the DEIR adequately studies and discloses the potential for significant impacts related to displacement, including secondary impacts, and no further changes to the DEIR are required.

Response 3-9

The commenter states that the DEIR inadequately analyzes the impacts of displacement and how such displacement impacts Land Use and Planning, Population, Housing and Employment, and other environmental factors under CEQA. The commenter suggests that mitigation measures or changes to the policies of the Proposed Project are necessary to ensure that the CASP Update's displacement impacts are truly "less than significant." The commenter recommends that the Proposed Project consider increasing affordability requirements to capture the additional land value created through the expansion of residential uses.

The Proposed Project includes strong affordable housing incentives, including non-residential use exemptions for 100 percent restricted affordable housing and supportive housing projects in the Urban Innovation and Urban Center zones and a Community Benefits Program that provides developers with the opportunity to develop additional floor area above the baseline permitted in exchange for providing restricted affordable housing. In addition to these incentives, future development in the Project Area would be required to comply with existing City policies for affordable housing, such as Proposition JJJ and the Affordable Housing Linkage Fee Ordinance. The DEIR determined that the Proposed Project would result in less than significant impacts with respect to displacement, land use and planning, and population, housing and employment, and the commenter does not provide substantial evidence supporting the need for a revised analysis or revised conclusions from those in the DEIR. Furthermore, the EIR is not intended or required to provide justification for the Proposed Project nor is it a vehicle for making changes to the Project absent one or more identified significant adverse environmental impact. As no significant environmental impacts related to displacement have been identified, no additional anti-displacement measures are required to be added to the CASP Update or the DEIR. Therefore, no further changes to the Proposed Project or DEIR are required.

Response 3-10

The commenter suggests four anti-displacement policies that the Proposed Project should implement, copied below:

- Rehouse displaced tenants as quickly and as close to home as possible: If a development will temporarily or permanently displace residents in the Plan area, the developer should first be required to offer any existing vacant units the developer already has that are within the CASP, at the tenant's existing rent. If the developer has no vacant units within the CASP, the developer should then be required to offer any existing vacant units outside the CASP, at the tenant's existing

rent, prioritizing those units closest to the Project Area. It should always be at the tenant's discretion whether they choose these offered replacement units, or the services of a relocation company to find them alternate accommodation.

- Displaced tenants should be able to avoid “double-moves”: Even if a developer builds a replacement unit for which a displaced tenant has a right of return, that tenant should have the option of remaining in their relocated unit on the same terms and conditions as they would be entitled to in the replacement unit under that right of return.
- Relocation Assistance Consultants should prioritize proximity to the CASP: In the event a displaced tenant elects to utilize the services of the Relocation Assistance Consultant, the Consultant should use all reasonable efforts to provide replacement housing listings that are within the CASP or within 3 miles surrounding the CASP, and along the same public transit corridors as the housing the tenant is being displaced from.
- Displaced former CASP residents should have priority in newly constructed housing in the Plan area: Tenants who are displaced from the CASP should have the highest priority to obtain other affordable housing within the Plan area. The CASP should be revised to implement a local preference policy, which shall be written into the regulatory agreement for all future affordable housing developments in the CASP.

As described above under Responses 3-3 through 3-9, the Proposed Project includes measures to incentivize retaining existing affordable housing and the provisioning of new affordable housing, and future development within the Project Area would also be required to comply with existing City and State anti-displacement policies. As addressed above, the Proposed Project would not result in significant environmental impacts related to displacement, and, therefore, additional mitigation measures related to displacement are not required. However, these recommendations will be shared with City decisionmakers for their consideration.

Response 3-11

The commenter states that the Proposed Project represents an improvement over the existing version of the CASP but believes that it could include more components to balance neighborhood stabilization with increased development.

This comment will be shared with City decision makers, and specific concerns raised by the commenter are addressed above. No further response is required.

LETTER NO. 4

Cassie Truong, Senior Transportation Planner, Development Review Team, Metro

September 14, 2023

Response 4-1

The comment is an introduction to the comment letters, including Metro's mission and statutory responsibility. No further response is required.

Response 4-2

The commenter provides a brief summary of the Proposed Project. No further response is required.

Response 4-3

The commenter states that the Proposed Project and EIR should include updated information on existing and planned transit services and facilities within the Project Area. The commenter encourages the City to continue providing additional density for developments surrounding major transit stops. The commenter provides resources for identifying major transit stops in the Project Area.

Pages 4.15-13 and 4.15-14 of the DEIR provide information on public transit services, including Metro and LADOT services, within the Project Area. Figure 4.15-4 illustrates existing bus and rail lines, as well as bus stops and rail stations within the Project Area at the time the Notice of Preparation for the DEIR was published, consistent with the environmental baselines guidance provided in CEQA Guidelines section 15152(a).

Response 4-4

The commenter states that Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro anticipates releasing the DEIR for that project in Spring 2024 with an anticipated operation date beyond 2028.

This information is noted and will be provided to City decision makers.

Response 4-5

The commenter provides information regarding the Connect US Action Plan to provide pedestrians and cyclists a safe and pleasurable passage to transit between Los Angeles Union Station, 1st/Central Station and adjacent historic neighborhoods. The commenter suggests the City should review this plan and explore the possibility of carrying through the recommended mobility improvements into the Project Area from adjacent corridors.

As addressed on pages 4.15-40 and 4.15-41, multi-modal improvements envisioned in the Proposed Project are intended to help minimize conflicts between pedestrians, bicyclists, and vehicles and enhance bicycle and pedestrian safety, consistent with the intent of applicable policies and programs including the City's Mobility Plan 2035, SCAG 2020-2045 RTP/SCS, and Metro's Connect US Action Plan. The DEIR determined that the Proposed Project would result in less than significant impacts with respect to conflicts with programs, plans, ordinances and policies addressing the circulation system and bicycle and pedestrian safety. The EIR is not intended or required to provide justification for the

Proposed Project nor is it a vehicle for making changes to the Project absent one or more identified significant adverse environmental impact. As no significant environmental impacts related to pedestrian and bicyclist mobility have been identified, no changes to the CASP Update or DEIR related to mobility are required.

Response 4-6

The commenter states that the EIR's transportation section should analyze potential impacts on Metro and Metrolink facilities within the Plan area and identify mitigation measures or project design features as appropriate. The commenter also recommends that the Proposed Project include a policy encouraging applicants to coordinate with Metro during City Planning review if the subject parcel is within a 100-foot buffer of Metro infrastructure. The commenter also states that such projects should comply with Metro's Adjacent Development Handbook.

The DEIR acknowledges the existing Metro facilities within the Project Area and discusses that the Proposed Project would facilitate active transportation and public transit use in the City by supporting new mixed-use development adjacent to existing public transit facilities and facilitating pedestrian and bicycle safety improvements. As noted on page 4.15-40 of the DEIR, "the Proposed Project describes the reasonably expected future development for a portion of the City and does *not* constitute a commitment to any project-specific development within the Project Area." No impacts to Metro facilities are anticipated. However, as stated on page 4.15-38 of the DEIR, "individual development projects will need to adhere to the requirements in LADOT's recently adopted Transportation Assessment Guidelines." The LADOT Transportation Assessment Guidelines includes a requirement for projects adjacent to Metro rights-of-way to coordinate with Metro. Any future development that occurs in the Project Area within 100 feet of Metro infrastructure would be required to coordinate with Metro and comply with the Adjacent Development Handbook.

Response 4-7

The commenter states that the Project Area includes and is adjacent to several transit stations and key bus lines. The commenter describes their support of development of commercial and residential properties near transit stations. The commenter encourages development projects and the City to orient pedestrian pathways towards nearby transit stations, install bicycle, pedestrian and public transit facilities and improvements, provide micro-mobility devices, enhance first- and last-mile connections, incorporate reduction or removal of minimum parking requirements, provide wayfinding signage, and install public art.

The Proposed Project would facilitate active transportation and public transit use in the City by supporting new mixed-use development adjacent to existing public transit facilities, implementing transit-oriented development standards such as no parking minimums and bicycle infrastructure requirements, and facilitating pedestrian and bicycle safety improvements. Any future development that occurs in the Project Area would be required to implement the standards included in the Proposed Project, as well demonstrate consistency with citywide policies such as Mobility Plan 2035 and the Vision Zero Action Plan.

LETTER NO. 5

Rowena Lau, Division Manager, Wastewater Engineering Services Division, LASAN

August 28, 2023

Response 5-1

The commenter states that upon review of the Proposed Project, LASAN has determined that the project is unrelated to sewers and does not require any hydraulic analysis. The commenter requests that LASAN is notified in the instance that additional environmental review is necessary for this project.

This comment is noted, and LASAN will continue to be notified of additional environmental review completed for the Proposed Project in accordance with the requirements of CEQA.

LETTER NO. 6

Katherine Rubin, Director of Corporate Environmental Affairs Division, LADWP

November 9, 2023

Response 6-1

The commenter provides an introduction to the comment letter and notes that the proposed Project may impact LADWP facilities because the Project Area includes sites adjacent to and within LADWP's Transmission Line Right of Way (TLRW).

The location of LADWP TLRW within the Project Area is noted. No further response is required.

Response 6-2

The comment relates to project-level review of proposed improvements within the TLRW. The Project is a plan level document, and no specific improvements are proposed at this time. LADWP is encouraged to comment on individual development projects as they are identified. As noted, individual development projects will be required to coordinate with LADWP and submit plans that meet LADWP's specifications. As no improvements are proposed at this time, no further response is required.

Response 6-3

The comment relates to project-level review of proposed improvements within the TLRW. The Project is a plan level document, and no specific improvements are proposed at this time. LADWP is encouraged to comment on individual development projects as they are identified. As noted, individual development projects will be required to coordinate with LADWP and submit plans that meet LADWP's specifications. As no improvements are proposed at this time, no further response is required.

LETTER NO. 7

Chinatown Community for Equitable Development

September 18, 2023

Response 7-1

The commenter introduces their organization and states that they have concerns regarding the Proposed Project and the DEIR.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 7-2

The commenter expresses that 100 percent affordable housing is required to prevent displacement in Chinatown and Lincoln Heights, neighborhoods with a large proportion of low-income residents. The commenter states that existing programs for affordable housing in the Project Area have not resulted in adequate affordable housing availability and have led to gentrification. The commenter states that the CASP Update incentives for affordable housing will not provide any meaningfully significant housing that is affordable to existing residents of Chinatown.

The Proposed Project is specifically aimed at encouraging affordable, mixed-income, and permanent supportive housing production, while supporting strategies to minimize displacement. Displacement is addressed in Section 4.12, *Population, Housing and Employment*, of the DEIR under Impact 4.12-2. Pages 4.12-22 and 4.12-23 of the DEIR acknowledge that indirect displacement of people, including those with lower incomes, is a concern citywide and within the Project Area. The rising cost of housing is currently a concern throughout the City, reflective of the shortage of housing in the City and the region as a whole. As population growth continues to outpace the production of housing units, the existing supply of housing is in higher demand which leads to higher rents/prices. Many renters are experiencing financial strain as average rents rise. While the majority of multi-family rental units in the Project Area is covenanted affordable, this occurrence may result in displacement of renters and may result in the need for people that live in the Project Area to move outside the Project Area or potentially outside of the City. The Proposed Project is specifically intended to expand the supply of housing for various income levels and thus help alleviate these displacement pressures. But there is no substantial evidence that there is a reasonable method to predict how many people may potentially be indirectly displaced in the Project Area, or the surrounding neighborhoods, over the Plan horizon, including factoring in the reasonably expected development that would occur with the Proposed Project.

The DEIR is a programmatic EIR for an update to the existing CASP. No specific development plans are included as part of the Project, and the Project would not require any existing housing to be demolished or reduced in order to be consistent with the Proposed Project's land use designations and zoning. In effect, existing development on the ground could be maintained and established uses could continue to operate. The Proposed Project would encourage retention of existing housing by focusing housing growth in predominantly industrial areas and away from existing residential neighborhoods. Nonetheless, the DEIR acknowledges that limited redevelopment of multi-family structures may occur due to the Proposed Project, which could result in the direct displacement of some housing units and residents during construction. In limited instances, the Proposed Project could potentially cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated or expanded. As noted in Section 4.12, *Population, Housing and Employment*,

of the DEIR, the number of displaced units and residents, the timing of such activities, and locations of any replacement housing, if needed, is too speculative to determine.

While the EIR acknowledges that some displacement of existing housing units is likely to occur in the short-term, the analysis also notes that the City has adopted a number of policies aimed specifically at minimizing displacement of affordable housing, that the Proposed Project would result in an overall increase in housing, including affordable housing, available in the Project Area, and that therefore displacement of housing requiring construction of new housing elsewhere to replace the displaced housing is not anticipated. As noted on page 4.12-17 of the DEIR:

Loss of affordable housing and displacement of low-income renters is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact (*Porterville Citizens v. City of Porterville*). Based on this, an impact from loss of affordable housing and displacement in this EIR will be an impact if it results in a physical impact to the environment, such as from construction of new housing elsewhere.

The Proposed Project is specifically aimed at accommodating current and anticipated housing demand as well as changing demographics in the Project Area. Although the number of existing units (including affordable units) that might be displaced by future development cannot be predicted with any degree of certainty, the Proposed Project would increase the reasonably expected development of housing in the Project Area by 900 percent (18,000 units), and thus there would be no need to construct new housing elsewhere. Therefore, the DEIR's conclusion that environmental impacts related to displacement of residences and the need to build new housing elsewhere would be less than significant remains valid.

The Proposed Project includes several anti-displacement measures, such as the Community Benefits Program to generate affordable housing in new development for all income levels within the Project Area. Future Development projects using the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with Assembly Bill (AB) 2222. The Proposed Project introduces a new Acutely Low Income category to the CASP, which targets households earning 0 to 15 percent of Area Median Income. Furthermore, the Proposed Project includes incentives specifically for 100 percent affordable housing projects, exempting such projects from non-residential use requirements that would otherwise be required for a market-rate or mixed-income development. Additionally, all new development in the Project Area will remain subject to the Affordable Housing Linkage Fee program. This program disincentivizes the loss of affordable units by requiring an additional fee if existing housing units are lost. A number of City regulations that are currently in place to minimize displacement of residents will continue under the Proposed Project, including:

- The citywide Residential Hotel Unit Conversion and Demolition Ordinance (RHO) offers protections for preservation of existing residential hotels and tenant rights and prohibits conversion or demolition of dwelling units in a residential hotel without approval from LAHD.
- The citywide Rent Stabilization Ordinance is intended to safeguard tenants from excessive rent increases. The Rent Stabilization Ordinance regulates replacement of demolished units, allowable rent increases, registration of rental units, legal reasons for eviction, and the causes for eviction requiring relocation assistance payment to tenants. Properties that contain two or more units, have a Certificate of Occupancy prior to October 1, 1978, and replacement units under LAMC Section 151.28 are subject to this ordinance.

- Proposition JJJ requires that all development projects of 10 or more residential units that require changes to the General Plan or other zoning make a percentage of the units affordable to low-income and working residents or pay a fee to fund affordable housing and enforce laws that protect renters.

The City's Housing Element also includes a range of policies aimed at protecting and developing affordable housing. Finally, the State has adopted a number of bills aimed at protecting and developing affordable housing over the past several years. Notably, SB 330, the Housing Crisis Act, tightens the protections for development projects by limiting a jurisdiction's ability to change development standards and zoning applicable to the project once a preliminary application is submitted. The Proposed Project seeks to preserve the affordability of existing housing stock and minimize displacement. Projects using Density Bonus Law, or the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with AB 2222. Additionally, the Housing Crisis Act of 2019, as amended by SB 8 (California Government Code Section 66300 et seq.), prohibits the approval of any proposed housing development project on a site that will require demolition of existing dwelling units or occupied or vacant "Protected Units" unless the project replaces those units at rents affordable to lower income tenants. These provisions will result in the retention of existing affordable units and a net gain of additional affordable units in the transit-rich areas of the Project Area.

Response 7-3

The commenter states the substantial increase in population in the Project Area must be studied in the EIR for how it will affect the neighborhood including traffic, pedestrian safety, pollution, and public resources such as schools and public transit.

The increase in residents and employees that is anticipated to occur under the Proposed Project is identified in Section 4.12, *Population, Housing and Employment*, of the DEIR (4.12-17 through 4.12-20). This information is utilized in Section 4.13, *Public Services*, and Section 4.14, *Recreation*, of the DEIR to study the potential impacts to public resources including schools (pages 4.13-29 through 4.13-31), parks (pages 4.14-12 through 4.14-14), fire (pages 4.13-11 through 4.13-13) and police services (pages 4.13-21 through 4.13-23), and libraries (pages 4.13-35 and 4.13-36) due to the increase in population and employees within the Project Area. As disclosed therein, the expansion of existing facilities and or development of new facilities, including fire stations, police stations and schools, are anticipated to be required to accommodate the projected growth in the Project Area. The potential impacts of the proposed project on the transportation system, including public transit and pedestrian safety, are addressed in Section 4.15, *Transportation and Traffic*, of the DEIR (pages 4.15-38 through 4.15-47). As described therein, the Proposed Project would be consistent with City and regional goals to decrease VMT and encourage alternative modes of transportation, such as walking, biking, and public transit. The Proposed Project would improve pedestrian and bicyclist safety and reduce VMT in the Project Area. The potential for the Proposed Project to result in impacts related to air pollution, including due to increased population and employment in the Project Area, is addressed in Section 4.2, *Air Quality*, (pages 4.2-23 through 4.2-37) of the DEIR. The commenter provides no substantial evidence supporting the need for additional analysis or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 7-4

The commenter states that the Proposed Project would result in gentrification in Chinatown and promote unaffordable housing and cites the loss of legacy small businesses.

Refer to Response 7-2 above. Additionally, the Proposed Project includes policies and zoning standards that support legacy small businesses, including a Community Facilities incentive for projects that dedicate floor area to Legacy Small Business Area.

Response 7-5

The commenter expresses opposition to adoption of the Proposed Project.

Expressions of opposition to or support for the Proposed Project are made a part of the administrative record and forwarded to the decision-makers for their consideration in taking action on the Project.

LETTER NO. 8

Jennifer Turner, acting for: David Mayer, Environmental Program Manager, South Coast Region, CDFW

September 14, 2023

Response 8-1

The commenter describes CDFW's role as a Trustee Agency. The commenter states that their comments have been prepared pursuant to the CDFW's authority as a Trustee Agency under Fish and Game Code Section 711.7a and 1802, Public Resources Code Section 21070, and CEQA Guidelines Sections 15386a. The commenter also states that CDFW may need to exercise regulatory authority to the extent implementation of the Proposed Project may result in "take." The commenter states that CDFW recommends the Project obtain appropriate authorization under the Fish and Game Code.

This comment is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 8-2

The commenter describes the proposed Project, location, and objectives as outlined in the DEIR.

This comment is noted. No further response is required.

Response 8-3

The commenter states that CDFW offers the comments and recommendations provided in the letter to assist the City in adequately identifying the Proposed Project's significant, or potentially significant direct and indirect impacts on fish and wildlife (biological) resources. Responses 8-4 through 8-16 address the comments that follow and have been prepared with consideration of the commenter's authority over the project and responsibility of the lead agency to comply with the requirements of CEQA.

Response 8-4

The commenter states that the Project may impact over-wintering burrowing owls (*Athene cunicularia*). The commenter concurs with the DEIR that burrowing owl have "been known to nest in manmade objects such as pipes and riprap" and cites Mitigation Measure 4.3-2, which pertains to a pre-construction survey. The commenter states that the mitigation measure, as presented, may not reduce impacts to a level less than significant if burrowing owls are detected. The commenter further states there is no mitigation measure requiring the replacement of lost burrowing owl habitat. As discussed in Impact 4.3-1, implementation of Mitigation Measure 4.3-1 and 4.3-2 would reduce potential impacts to burrowing owl to a less-than-significant level by ensuring that active nests are identified and avoided, as necessary to avoid the loss of any burrowing owl habitat. Moreover, Mitigation Measure 4.3-2(c) has been added to the EIR further reduce impacts to burrowing owls:

Mitigation Measure 4.3-2(c) Burrowing Owls

Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the Project Applicant shall perform a preconstruction survey of the Project area for burrowing owls no further out then 14 days prior to construction

activities. The preconstruction survey shall be conducted by a qualified biologist. If grounddisturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing grounddisturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st through August 31st) and a non-disturbance buffer shall be demarcated within 500 feet of the burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.

With the imposition of Mitigation Measure 4.3-2(c), impacts would be reduced to a level less than significant if burrowing owls are detected and any potential loss in burrowing owl habitat as a result of the Proposed Project would be replaced.

Response 8-5

The commenter lists the criteria for a species as being considered a Species of Special Concern (SSC) and states that inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect.

The addition of Mitigation Measure 4.3-2(c) would mitigate impacts to burrowing owl to a less than significant level by including requirements for a preconstruction survey, impact assessment, mitigation plan, and habitat replacement. This comment is noted. No further response is required.

Response 8-6

The commenter recommends a specific mitigation measure for burrowing owl, which has been added to the EIR as Mitigation Measure 4.3-2(c). Impacts to burrowing owl are discussed in Impact 4.3-1. Mitigation for impacts to burrowing owl is also addressed in Mitigation Measure 4.3-1, which requires a biological resources assessment to identify biological resources and thus identify specific mitigation necessary for each project proposed within the specific plan area (Project Area). Updates to Mitigation Measure 4.3-1 to further address impacts to special status species include an analysis of impacts at the Project level.

Response 8-7

The commenter recommends a mitigation measure for compensatory mitigation of burrowing owl habitat. As discussed in Impact 4.3-1, the Project does not provide ideal or marginal habitat for burrowing owl. Although the Project Area may include manmade objects such as riprap or pipes for nesting, it does not include habitat and as such mitigation measures for habitat replacement is not necessary. Avoidance and minimization measures for burrowing owl within manmade objects are included in Mitigation Measures 4.3-2(a) and 4.3-2(c) as described in Response 8-4.

Response 8-8

The commenter states that the Project may impact several bat species, including western mastiff bat (*Eumops perotis californicus*) and big free-tailed bat (*Nyctinomops macrotis*). The commenter states that Project activities which include ground disturbing activities that may disturb areas that may provide foraging habitat. As discussed in Environmental Setting, the Project Area is fully urbanized, and generally lacks native biological habitat. The Los Angeles River and Arroyo Seco, as well as small portions of parks and open space, trees, and minor urban landscaping, are the only sources of biological habitat in and around the Project Area and are not changing with the Proposed Project.

As stated in Impact 4.3-1, neither of these special status bat species are expected to utilize these urban habitats, because their specific habitat components (e.g., high cliffs, rocky outcroppings and open and semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral) are absent from the Project Area. Therefore, impacts to these species would not occur. Impacts to non-listed bat species protected under California Fish and Game Code (CFGF) would be mitigated to a less than significant level through surveys and creation of site-specific mitigation measures described in Mitigation Measure 4.3-1, Biological Resources Assessment. Impact 4.3-1 has been updated to include discussion of non-listed bat species as follows:

Non-listed bat species, protected under CFGF, may occur within the Project Area in trees with exfoliating bark, tree hollows, broad leafed trees, palm fronds, bridges, hollow beams, attics, and eaves of buildings. Bats typically have a maternity season (generally from April 1 through August 31) and maternity roosts will be situated in areas to raise young. Depending on the species, some bats may not migrate and will use the same roost year-round. Additionally, bats may go into torpor (a temporary hibernation) during colder months (generally November to February) where bats may not be detectable while they are in deep sleep, making any potential relocations or evictions more challenging during this time frame. Many non-listed bat species are adapted to human disturbance and may roost throughout the Project Area. As such, tree trimming or removal as well as removal of structures with suitable crevices in the Project Area would have the potential to disturb a roosting bat, which could constitute a violation of the CFGF. In addition to direct impacts to roosting bats, temporary, indirect impacts including excessive noise or dust could affect bats. Therefore, impacts to active non-listed bats would be *potentially significant* before mitigation.

Response 8-9

The commenter states that bats are considered non-game mammals and are protected under CFGF Section 4150 and California Code of Regulations Section 251.1. The commenter also states that certain bat species are considered SSC and are afforded protection under CEQA Guidelines Section 15065. This Section of the CEQA Guidelines also states that impacts to SSCs could require mandatory finding of significance. This comment is noted. No further response is required.

Response 8-10

The commenter suggests a mitigation measure to address impacts to bat species, including surveys to be incorporated into the EIR. Impacts to non-listed bat species would be mitigated through surveys and creation of site-specific mitigation measures discussed in Mitigation Measure 4.3-1 Biological Resources Assessment.

Response 8-11

The commenter suggests a mitigation measure to address impacts to maternity roosts. Impacts to non-listed bat species would be mitigated through surveys and creation of site-specific mitigation measures discussed in Mitigation Measure 4.3-1.

Response 8-12

The commenter recommends changes to Mitigation Measure 4.3-1 Biological Resources Assessment that include a complete assessment and impact analysis with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitat. They suggest that the impact analysis should include direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. They also note that the CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site.

As discussed in Impact 4.3-2, no sensitive natural communities occur within the Project Area. Mitigation Measure 4.3-1 has been updated to require a review of biological resources with potential on the Project site and surrounding area, including species-specific surveys for sites that contain suitable habitat for protected and non-listed species, and preparation of a report that includes an impact analysis with emphasis on identifying endangered, threatened, sensitive, regionally, locally unique species, and sensitive habitat, and potential direct, indirect, and cumulative biological impacts with specific mitigation measures necessary to avoid those impacts. These changes to Mitigation Measure 4.3-1 will be included in Section 2, *Correction and Additions*, of this FEIR.

Further, the commenter recommends the biological resources assessment include the following:

- a) Information on the regional setting and measures to address impacts to sensitive natural communities.

As discussed in Impact 4.3-2, no sensitive natural communities occur within the Project Area.

- b) A floristic-based assessment of special status plants and natural communities.

As discussed in Impacts 4.3-1, no special status plants have potential to occur on in the Project. As discussed in the Environmental Setting, the Project Area is fully urbanized, and generally lacks native biological habitat. The Los Angeles River and Arroyo Seco, as well as small portions of parks and open space, trees, and minor urban landscaping, are the only sources of biological habitat in and around the Project Area and are not impacted by the Proposed Project.

- c) Floristic mapping and vegetation impact assessment.

As discussed in the Environmental Setting, the Project Area is fully urbanized, and generally lacks native biological habitat. The Los Angeles River and Arroyo Seco, as well as small portions of parks and open space, trees, and minor urban landscaping, are the only sources of biological habitat in and around the Project Area.

- d) An assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a Project, including a 9-quadrangle search of the CNDDB.

As discussed above, Mitigation Measure 4.3-1 has been revised to indicate that the assessment of biological resources shall include each habitat type on site and within adjacent areas.

- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect.

Mitigation Measure 4.3-1 has been revised to indicate that the assessment of biological resources shall include a discussion of non-listed bat species.

- f) A recent wildlife and rare plant survey.

Mitigation Measure 4.3-1 has been revised to include species specific surveys for protected species, should suitable habitat be observed during the site assessment.

Response 8-13

The commenter states that, per the California Code of Regulations (CCR) Title 14 Section 650, a Scientific Collecting Permit (SCP) is required to monitor project impacts on wildlife resources.

All tasks identified in Mitigation Measures 4.3-1 and 4.3-2 are required to be performed by a qualified and knowledgeable biologist with experience in the region. Pursuant to Section 650 of the CCR, a qualified biologist, by definition, would be someone who is in possession of an SCP for any activities that would require an SCP.

Response 8-14

The commenter states that CEQA requires information developed in EIRs and negative declarations be incorporated into a database (i.e., the California Natural Diversity Database [CNDDB]).

The following language has been incorporated into Mitigation Measure 4.3-1 to address this comment:

If any observations of special status species are made during a biological resource assessment for individual projects, the biologist shall submit all observations of special status species to CNDDB and all observations of special status plant populations or sensitive communities to CDFW's Vegetation Classification and Mapping Program within 90 calendar days of the observation.

Response 8-15

The commenter states that rodenticides and second-generation anticoagulant rodenticides should be prohibited both during and over the life of the Project. However, all projects would be anticipated to adhere to current state laws (Assembly Bill 1788) that regulate the use of rodenticides.

LETTER NO. 9

Jenny Scanlin, Chief Development Officer, Housing Authority of the City of Los Angeles (HACLA)

October 13, 2023

Response 9-1

The commenter introduces their organization and states that they have concerns regarding the Proposed Project and the DEIR.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 9-2

The commenter notes that the William Mead site is a public housing community within the Project Site and is owned and managed by HACLA. HACLA is a responsible agency for a potential future project to redevelop the William Mead site and would be required to examine the redevelopment in light of the CASP Update EIR, as the programmatic EIR governing redevelopment of the CASP.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 9-3

The commenter states that the DEIR fails to adequately analyze or mitigate the impacts on historical resources, which reduces its utility for streamlining later activities within the CASP, such as redevelopment of the William Mead site. The commenter notes that the DEIR identifies significant and unavoidable impacts to historical resources within the Project Area but provides no analysis of the severity of such impacts or mitigation measures to reduce impacts. The commenter states that the DEIR is required to identify feasible mitigation measures to reduce impacts to historical resources, and that HACLA has provided feasible mitigation measures to the City previously.

The DEIR is a programmatic EIR for an update to the existing CASP. No specific development plans are included as part of the Project, and the Project would not require any existing structures to be demolished in order to be consistent with the Proposed Project's land use designations and zoning. In effect, existing development on the ground could be maintained and established uses could continue to operate. Nonetheless, the DEIR acknowledges that redevelopment of structures may occur due to the Proposed Project, which could result in significant and unavoidable impacts to existing historical resources within the Project Area.

HACLA is exploring the potential future redevelopment of housing on the William Mead site, which is currently developed with a public housing complex that was constructed in 1941-1942 and has been previously determined eligible for listing in the National Register of Historic Places (NRHP) with the California State Historic Preservation Officers (SHPO) concurrence (see Appendix C – William Mead Homes Project Cultural Resources Impact Report). Redevelopment of the William Mead site, which may occur due to the Proposed Project, could entail the demolition of existing structures on the site which are historical resources and could therefore result in significant and unavoidable impacts to this historical resource. To provide analysis on the severity of such impacts if the William Mead site were to be redeveloped and the existing designated structure were to be demolished, and to identify feasible mitigation measures to reduce such impacts to historical resources, Section 4.4, *Cultural Resources*, of

the EIR has been updated to include discussion of the William Mead site, as reflected in Chapter 2, *Corrections and Additions*, of this FEIR.

While impacts to historical resources from the Proposed Project would be significant and unavoidable, if HACLA pursues a project to demolish the existing structures, the following Mitigation Measures 4.4-1(a) and 4.4-1(b), would be feasible and would reduce impacts to the greatest extent feasible relative to the potential future redevelopment of the William Mead Homes site:

4.4-1(a) Interpretive Display

HACLA, as lead agency and Applicant, shall retain a qualified historian or architectural historian meeting the Secretary of the Interior's Qualification Standards (NPS 1983) in coordination with the City of Los Angeles Office of Historic Resources to prepare content for an interpretive display in a portion of the project site which will be open to the public. The interpretive display shall be completed and installed prior to the issuance of occupancy permits for the new development. It shall include a brief history of William Mead Homes and present its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure 4.4-1(b). The Interpretive Display may be rotated amongst publicly accessible spaces located throughout the project site with approval by HACLA. This mitigation measure shall only apply if and when redevelopment of the William Mead Homes site occurs.

4.4-1(b) Informational Website

HACLA shall add to their existing website a section dedicated to the history of William Mead Homes and public housing in Los Angeles within six months of the issuance of a grading permit for the project. The website shall be maintained by HACLA and shall provide content on the history of William Mead Homes, the significance of public housing in the City, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the City. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history and shall be periodically updated, as needed, if new scholarly information related to the history or significance of William Mead Homes and public housing become available following the initial publishing of the website. This mitigation measure shall only apply if and when redevelopment of the William Mead Homes site occurs.

Response 9-4

The commenter provides example mitigation measures for historical resources that have been utilized in an EIR for another specific plan within the City of Los Angeles. The example mitigation measures include a requirement that the preservation, rehabilitation, restoration, reconstruction, or adaptive reuse of historical resources meet the U.S. Secretary of the Interior's Standards for Rehabilitation to the extent feasible. Additionally, a requirement for a site-specific historical resources assessment to determine whether a property is a historic resource is included as an example mitigation measure. The commenter also states that CEQA recognizes that documenting a historical resource can serve as

sufficient mitigation. The commenter encourages the City to include similar mitigation measures for historical resources in the CASP Update EIR.

As noted in Section 4.4, *Cultural Resources*, of the DEIR, as a policy matter, the City finds that requiring additional review of projects otherwise undergoing discretionary review is undesirable based on the requirements it would place on City resources and the delay it would result in for projects. Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes on ministerial projects involving historical resources that are designated under the HCM or identified in the 2011 Project Area Survey. However, Mitigation Measures 4.4-1(a) and 4.4-1(b), which require documentation of a historical resource through an interpretive display and informational website respectively, have been added to the EIR relative to the potential future redevelopment of the William Mead Homes site, as they have been found to be feasible.

Response 9-5

The commenter states that Chapter 5, *Alternatives*, of the DEIR states that “implementation of Mitigation Measures 4.4-1(a), (b) and (c) would reduce the potential to disturb historic resources (See Draft EIR, pp. 5-19, 5-31, 6.3)”, but no historical resources mitigation measures are included in the DEIR. The commenter suggests that the DEIR be revised and recirculated to remove contradictory information and include feasible mitigation measures for historical resources.

This error has been corrected and Mitigation Measures 4.4-1(a) and 4.4-1(b) have been added to the EIR to reduce the potential for impacts to historical resources. Chapter 5 Section 5.5, *Alternatives Comparative Impacts Analysis*, and Chapter 6 Section 6.0, Other CEQA Considerations, have been revised accordingly to correct the error and reflect the addition of these two mitigation measures, as reflected in Chapter 2, *Corrections and Additions*, of this FEIR. The impact remains significant and unavoidable with site specific mitigation measures added to reduce the impacts to the extent feasible.

Response 9-6

The commenter suggests that the DEIR does not examine feasible alternatives that would avoid or substantially reduce impacts to historical resources, as required by CEQA. The commenter suggests inclusion of a Historic Preservation Alternative that focuses on substantially reducing impacts to historical resources and would still attain most of the Project objectives.

Discussion on two additional alternatives, Alternative 4 (Historical Rehabilitation) and Alternative 5 (Partial Preservation), has been added to Section 5.6, *Alternatives Considered but Rejected*, of the EIR. The two alternatives discussed are limited to reducing impacts to historical resources should there be future redevelopment of the William Mead Homes site. Under Alternative 4, any future work on the William Mead Homes site in the Project Area would be required to be performed in conformance with the Secretary of Interior (SOI) Standards for Rehabilitation and the California Historical Building Code (CHBC), while under Alternative 5, certain portions of the existing buildings would be maintained while other portions would be demolished and reconstructed in phases should there be redevelopment of the William Mead Homes site. Pursuant to Section 15126.6 (c) of the *CEQA Guidelines*, both alternatives were rejected from further consideration because they were deemed infeasible, as further discussed and reflected in Chapter 2, *Corrections and Additions*, of this FEIR.

Response 9-7

The commenter provides a concluding statement regarding the lack of feasible mitigation measures and range of alternatives in the DEIR.

As discussed above, Mitigation Measures 4.4-1(a) and 4.4-1(b), which require documentation of a historical resource through an interpretive display and informational website respectively, have been added to the EIR relative to the potential future redevelopment of the William Mead Homes site only. A discussion on two additional alternatives that are limited to reducing impacts to the William Mead Homes site should the site be redeveloped was added to the FEIR, along with discussion as to why the additional alternatives, including a Historical Rehabilitation alternative and a Partial Preservation alternative, were rejected from further consideration due to infeasibility.

LETTER NO. 10

San Wang, Program Supervisor, CEQA IGR, South Coast Air Quality Management District (SCAQMD)

September 15, 2023

Response 10-1

The commenter introduces their organization and states that they have concerns regarding the Proposed Project and the DEIR.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 10-2

The commenter states that the lead agency has not provided any analysis for emissions related to localized significance thresholds for operational activities.

As stated in SCAQMD's Final Localized Significance Threshold Methodology, the LSTs screening table only applies to regional projects if specific projects are identified. The specific locations, size, distance to sensitive receptors, and details of future Project Area operational activity are unknown. Therefore, it would be speculative to assess the impacts of on-site operational emissions. This is the same as performing dispersion modeling without specific project details.

Subtracting the operational area and energy source emissions from 2040 with the Proposed Project and Existing emission scenarios, we could get the average on-site emission for a 10-acre project by dividing the net emission by 60. With this approach, the average on-site operational emission would be 5.7 lbs./day for nitrogen oxides (NO_x), 23.5 lbs./day for carbon monoxide (CO), 2.1 lbs./day for coarse particulate matter (PM₁₀), and 0.5 lbs/day for fine particulate matter (PM_{2.5}), which would be below the LST thresholds for 5 acre or more sites within 25 meters from receptors. However, this analysis is speculative without specific data for future individual projects, and impacts would remain significant and unavoidable, as disclosed in the DEIR. As individual projects are developed towards the 2040 buildout year, energy efficiency on individual projects will improve; therefore, this analysis is conservative. Further, individual projects would be required to assess localized operational impacts and the Proposed Project has implemented mitigation to the extent feasible with current information.

Response 10-3

The commenter states that Tier 4 technology may not be the cleanest technology when construction occurs later for individual projects and that Off-Road Tier 5 equipment should be considered.

As stated in Mitigation Measure 4.2-2, Construction Emissions Reduction, the Proposed Project would require construction equipment equipped with Tier 4 technology for equipment over 50 horsepower or alternative fuels where applicable. These are the current technology and mitigation measures available to reduce emissions from equipment exhaust to the maximum extent feasible. The Proposed Project could implement Tier 5 technology or zero emission technology when economically feasible and available during the Proposed Project's lifetime. However, without specific projects identified, construction details, and when the cleaner technology would hit the market and provide emissions reduction, it would be speculative to determine impacts and whether the technology would be available to reduce impacts.

Response 10-4

The commenter states that even though the Proposed Project consists of approximately 600-acres of land being developed over the course of 17-years of construction, the DEIR does not analyze the scenario of overlapping between the construction and operational activities.

Without specific projects identified from the Proposed Project and construction details, it is speculative when operations would occur to overlap emissions and the number of emissions generated from operational sources. Moreover, combining emissions that would be generated during construction activities and future operational conditions is not standard procedure when analyzing air quality impacts under CEQA. Nowhere in the District's *Handbook* is there an indication that this combination of emissions would be appropriate. Furthermore, the Air Quality Significance Thresholds for construction and operation were derived using different methods, and the *Handbook* explicitly recognizes that operations begin following the completion of construction activities. It is not practically possible to estimate the incremental increase in daily construction acreage, daily construction equipment activity, or daily construction truck trips throughout the entirety of the Project Area that would result from implementation of the Proposed Plan.

Response 10-5

The commenter states that permits from the SCAQMD are required if the implementation of the Proposed Project would require the use of new stationary equipment, such as internal combustion engines.

Without specific project details, making assumptions on the number, size, and operating hours of new stationary equipment within the Project Area is speculative. Individual projects would be required to make those assumptions and determine health impacts on sensitive receptors. As described under Impact 4.2-3 of the DEIR, the use of generators and toxic compounds within the Project Area would be permitted through SCAQMD and its permitting process, and Regulation XIV would ensure that equipment associated with new industrial facilities would not generate TAC emissions exceeding the SCAQMD standards or adversely affect sensitive land uses.

Response 10-6

The commenter expresses their gratitude for being included in the public review process and that they are available to speak with, if needed.

This information is noted, and specific concerns raised by the commenter are addressed above. No further response is required.

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 Introduction

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). It is the intent of this program to: (1) verify satisfaction of the required mitigation measures of the EIR (EIR); (2) provide a methodology to document implementation of the required mitigation measures; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) use existing review processes wherever feasible.

This MMRP describes the procedures for the implementation of the mitigation measures adopted for the Proposed Project. The MMRP for the Proposed Project will be in place through the planning horizon of the Project or until the Proposed Project and EIR are updated again, whichever is later. The City of Los Angeles Department of City Planning (DCP) staff and staff of other City Departments (e.g., Department of Building and Safety) shall be responsible for administering the MMRP activities or delegating them to consultants, or contractors. The Monitoring or Enforcing Agencies identified herein, at their discretion, may require a project applicant or operator to pay for one or more independent environmental monitor(s) to be responsible for monitoring implementation of mitigation measures (e.g., City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures) required of project applicants or operators. Monitors would be hired by the City or by the applicant or operator at the City's discretion.

Each mitigation measure is identified in **Table 4-1, Mitigation Monitoring and Reporting Program Matrix**, and is categorized by environmental topic and corresponding number with identification of:

- The Implementing Party or Agency – this is in most cases, the applicant for individual projects who will be required to implement most of the measures.
- The Enforcement and Monitoring Entity – this is the entity or entities that will monitor each measure and ensure that it is implemented in accordance with this MMRP.
- Monitoring Phase and Monitoring Actions – this is the timeframe that monitoring would occur and the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

Many of the mitigation measures are implemented through the environmental protection measures/standards either through the CASP or EPM Handbook process. Others may be implemented through the imposition of conditions of approval subject to the City's authority to condition the applicable entitlement for any subsequent environmental review pursuant to *State CEQA Guidelines* Sections 15162, 15163, 15164, or 15168, or tiered clearance to this EIR, pursuant to the procedures in *State CEQA Guidelines* Section 15152 or streamlining CEQA Clearance as permitted in PRC Sections 21083, 21094.5, 21155-21155.2, 21155.4 or CEQA Guidelines Sections 15183 or 15183.3.

For mitigation measures implemented through the CASP or the EPM Handbook, the following shall occur:

- Adopt environmental standards or protection measures to implement, and that are consistent with, the mitigation measures; and

- Require projects to substantially conform with all applicable environmental standards or environmental protection measures, subject to the discretion of the enforcing and monitoring agency; and
- Authorize any City implementing, monitoring or enforcing agency, to require the applicant to hire an outside consultant (which may or shall be subject to City approval) to monitor and certify compliance with the environmental standards or protection measures, or develop any other administrative procedures to ensure compliance with the environmental standards or protection measures, including but not limited to requiring the applicant to sign acknowledgement of environmental standards or protection measures and provide affidavit committing to comply with applicable environmental standard or protection measures, and maintain records for certain period of time and hold records available for City inspection to demonstrate compliance.

For the mitigation measures implemented through the CASP or EPM Handbook, they may do the following:

- Provide for the modification or a deletion of an environmental standard or protection measure subject to the following: The Planning Director may determine substantial conformance with the environmental standard in his or her reasonable discretion. If the Planning Director cannot find substantial conformance, an environmental standard may be modified or deleted if the Planning Director, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, including sections 15162 and 15164, by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the environmental standard. Any addendum or subsequent CEQA clearance shall explain why the mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a mitigation measure shall not require a modification to any project discretionary approval unless the Planning Director or decisionmaker also finds that the change to the environmental standard requires a modification or other entitlement under the LAMC or other City ordinance or regulation.

Mitigation measures imposed as a condition of approval shall be imposed with a MMRP that may include the following provisions:

- This MMRP shall be enforced throughout all phases of development projects subject to the mitigation measures. The Applicant shall be responsible for implementing each mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each project design feature and mitigation measure has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure. Such records shall be made available to the City upon request. Further, specifically during the construction phase (including excavation, grading and demolition) and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by DCP, who shall be responsible for monitoring implementation of mitigation measures during grading and construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the mitigation measures during grading and construction every 90 days. The documentation must be signed by the Applicant and Construction Monitor and be maintained by the Applicant. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency/Entity any non-compliance with the mitigation measures within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall

be appropriately addressed by the Enforcement Agency/Entity. Until five years after all mitigation measures are fully satisfied, the Applicant and Owner shall maintain all records of mitigation measure compliance (e.g., reports, studies, certifications, verifications, monitoring or mitigation plans) and make the records available for the City's inspection within three business days of the City requesting the records. All records related to grading and construction shall be maintained on the construction site during grading and construction and shall be immediately available for inspection by the City or by the Construction Monitor. The Applicant/Owner shall also sign a Statement of Compliance, in a form approved by the City, prior to issuance of any building permit, committing to compliance with all applicable mitigation measures.

All development projects shall be in substantial conformance with the mitigation measures contained in this MMRP. The Enforcement Agency/Entity may determine substantial conformance with mitigation measures in the MMRP in their reasonable discretion. If the Enforcement Agency/Entity cannot find substantial conformance, a mitigation measure may be modified or deleted if the Enforcement Agency/Entity, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, including sections 15162 and 15164, by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a mitigation measure shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or the non-environmental conditions of approval.

Table 4-1 Mitigation Monitoring and Reporting Program Matrix

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
Impact – Air Quality			
4.2-2 Construction Emissions Reduction <u>AQ1-1: Dust Control Compliance with SCAQMD Rule 403</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment and require a permit from City of Los Angeles Department of Building and Safety. b. Standard Consistent with SCAQMD Rule 403, best available dust control measures shall be implemented during Ground Disturbance Activities and active construction operations capable of generating dust. <u>AQ1-2: Equipment</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment and require a permit from LADBS. b. Standard Maintain construction equipment in good, properly tuned operating condition, as specified by the manufacturer, to minimize exhaust emissions. Documentation demonstrating that the equipment has been maintained in accordance with the manufacturer’s specifications shall be maintained per the proof of compliance requirements in Subsection I.D.6 of the Environmental Protection Measures Handbook. All construction equipment shall achieve emissions reductions that are no less than what could be achieved by a Tier 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations. <u>AQ1-3: Vehicle Idling Limit and Notification Signs</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction vehicles and require a permit from LADBS.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>b. Standard</p> <p>Vehicle idling during construction activities shall be limited to five minutes as set forth in the California Code of Regulations, Title 13, Section 2449. Signs shall be posted in areas where they will be seen by vehicle operators stating idling time limits.</p> <p><u>AQ1-4: Non-Diesel Fueled Electrical Power</u></p> <p>a. Applicability Threshold</p> <p>Any Project whose construction activities involve the use of construction equipment and require a permit from LADBS.</p> <p>b. Standard</p> <p>Electricity from power poles rather than temporary gasoline or diesel-powered generators shall be used To the Extent Available and Feasible.</p> <p><u>AQ1-5: Emissions Standards for Off-Road Construction Equipment Greater than 50 Horsepower</u></p> <p>a. Applicability Threshold</p> <p>Any Project whose construction activities involve the use of construction equipment, require a permit from LADBS, and involve at least 5,000 cubic yards of on-site cut/fill on any given day.</p> <p>b. Standard</p> <p>All off-road diesel-powered construction equipment equal to or greater than 50 horsepower shall meet the U.S. Environmental Protection Agency's (USEPA) Tier 4 emission standards during construction or use alternative fuels (such as compressed natural gas, liquid petroleum gas, unleaded gasoline, or electricity.). Operators shall maintain records of all off-road equipment associated with Project construction to document that each piece of equipment used meets these emission standards per the proof of compliance requirement in Subsection I.D.6.</p> <p>In lieu of compliance with the above requirement, an air quality study prepared in accordance with the SCAQMD's Air Quality Handbook may be provided by the Applicant or Owner demonstrating that Project construction activities would not exceed the SCAQMD's regional and localized construction thresholds.</p>			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p><u>AQ1-6: Use of Low Polluting Fuels</u></p> <p>a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment, require a permit from LADBS, and involve at least 5,000 cubic yards of on-site cut/fill on any given day.</p> <p>b. Standard Construction equipment less than 50 horsepower shall use low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, unleaded gasoline, or electricity). In lieu of compliance with the above requirement, an air quality study prepared in accordance with the SCAQMD's Air Quality Handbook may be provided by the Applicant or Owner demonstrating that Project construction activities would not exceed the SCAQMD's regional and localized construction thresholds.</p> <p><u>AQ1-7: Emission Standards for On-Road Haul Trucks</u></p> <p>a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment, require a permit from LADBS, and involve more than 90 round-trip haul truck trips on any given day for demolition debris and import/export of soil.</p> <p>b. Standard Construction haul truck operators for demolition debris and import/export of soil shall use trucks that meet the California Air Resources Board's (CARB) 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of nitrogen oxides (NO_x) emissions. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards per the proof of compliance requirements in Subsection I.D.6 of the Environmental Protection Measures Handbook.</p>			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>In lieu of compliance with the above requirement, an air quality study prepared in accordance with the SCAQMD's Air Quality Handbook may be provided by the Applicant or Owner demonstrating that Project construction activities would not exceed the SCAQMD's regional and localized construction thresholds.</p> <p><u>AQ1-8: Routes for On-Road Haul Trucks</u></p> <p>a. Applicability Threshold</p> <p>Any Project whose construction activities involve the use of construction vehicles and require a permit from LADBS.</p> <p>b. Standard</p> <p>Construction contractors shall reroute construction trucks away from congested streets or Sensitive Uses, as feasible. The burden of proving that compliance is infeasible shall be upon the Applicant or Owner. Where avoiding Sensitive Uses and congested streets altogether is infeasible, routing away from Sensitive Uses shall be prioritized over routing away from congested streets.</p>			
Impact – Biological Resources			
<p>4.3-1 Biological Resources Assessment</p> <p>For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include a review of biological resources with potential on the Project site and surrounding area. It will include a search of the California Natural Diversity Database (CNDDDB) maps to determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or non-listed bat species. Species-specific surveys for sites that contain suitable habitat for protected species and non-listed bat species, and preparation of a report that includes an impact analysis with emphasis on identifying endangered, threatened, sensitive, regionally, locally unique species, and sensitive habitat, and potential direct, indirect, and cumulative</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>biological impacts with specific mitigation measures necessary to avoid those impacts. If any observations of special status species or non-listed bat species are made during a biological resource assessment for individual projects, the biologist shall submit all observations of special status species and non-listed bat species to CNDDB and all observations of special status plant populations or sensitive communities to CDFW's Vegetation Classification and Mapping Program within 90 calendar days of the observation.</p>			
<p>4.3-2(a) Pre-Construction Bird Nest Surveys and Avoidance</p> <p>For projects in the Project Area, a pre-construction survey for nesting bird, including ground nest birds, survey shall be conducted no more than ten days prior to initiation of ground disturbance and vegetation removal activities for any grading or construction activity initiated during the bird nesting season (February 1 – August 31).</p> <p>The nesting bird pre-construction survey shall be conducted on foot by a qualified biologist and shall include a 100-foot buffer around the construction site. If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities or vegetation removal shall occur within this buffer until the biologist has confirmed that breeding/ nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A Statement of Compliance signed by the Applicant and Owner is required to be submitted to LADBS at plan check and prior to the issuance of any permit. Any survey, report, construction monitoring, and implementation of protective measures conducted shall be documented by a qualified biologist and shall be provided to the City upon request. Best management practices (BMPs) to avoid disturbing nesting birds, including burrowing owls, during construction include visually check all sections of pipe or other construction materials for the presence of</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
wildlife before moving and capping or elevating the ends of all pipes or similar construction materials while storing to prevent wildlife from entering them.			
4.3-2(b) Notification All project applicants will be notified of and shall include on their plans an acknowledgement of the requirement to comply with the federal MBTA and CFGC to not destroy active bird nests and of best practices recommended by qualified biologist to avoid impacts to active nests, including checking for nests prior to construction activities during February 1-August 31 and what to do if an active nest is found, including inadvertently during grading or construction activities. Such best practices shall include giving an adequate construction and grading buffer to avoid the active nest during construction.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety
4.3-2(c) Burrowing Owls Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the Project Applicant shall perform a preconstruction survey of the Project area for burrowing owls no further out then 14 days prior to construction activities. The preconstruction survey shall be conducted by a qualified biologist. If grounddisturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing grounddisturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st through August 31st) and a non-disturbance buffer shall be demarcated within 500 feet of the	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.			
Impact – Cultural Resources			
<p>If the contributing building and structures on the William Mead Homes site are demolished, HACLA will be required to implement the following Mitigation Measure.</p> <p>4.4-1(a) Interpretive Display</p> <p>HACLA, as lead agency and Applicant, shall retain a qualified historian or architectural historian meeting the Secretary of the Interior's Qualification Standards (NPS 1983) in coordination with the City of Los Angeles Office of Historic Resources to prepare content for an interpretive display in a portion of the project site which will be open to the public. The interpretive display shall be completed and installed prior to the issuance of occupancy permits for the new development. It shall include a brief history of William Mead Homes and present its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure 4.4-1(b). The Interpretive Display may be rotated amongst publicly accessible spaces located throughout the project site with approval by HACLA. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.</p>	Prior to issuance of grading or building permits submittal of plans with measure on plans; collection of acknowledgement by owner; subject to inspection by DBS; enforcement of violations available through LAMC at City discretion.	Housing Authority of the City of Los Angeles (HACLA)	City of Los Angeles, Department of Building and Safety
<p>If the contributing building and structures on the William Mead Homes site are demolished, HACLA will be required to implement the following Mitigation Measure.</p> <p>4.4-1(b) Informational Website</p> <p>HACLA shall add to their existing website a section dedicated to the history of William Mead Homes and public housing in Los Angeles</p>	Prior to issuance of grading or building permits submittal of informational website link; collection of acknowledgement by owner; subject to inspection by DBS; enforcement of violations available through LAMC at City discretion.	Housing Authority of the City of Los Angeles (HACLA)	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>within six months of the issuance of a grading permit for the project. The website shall be maintained by HACLA and shall provide content on the history of William Mead Homes, the significance of public housing in the city, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the city. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history and shall be periodically updated, as needed, if new scholarly information related to the history or significance of William Mead Homes and public housing become available following the initial publishing of the website. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.</p>			
<p>4.4-2(a) Archaeological Resources Evaluation and Avoidance/Recovery</p> <p><u>CR1-1: Inadvertent Discovery</u></p> <p>a. Applicability Threshold Any Project that requires a permit for grading or excavation.</p> <p>b. Standard</p> <p>If a possible archaeological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Archaeologist has been retained to evaluate the find in accordance with National Register of Historic Places and California Register of Historical Resources criteria. The Qualified Archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius. Any potential archaeological resource or associated materials that are uncovered shall not be moved or collected by anyone other than an archaeological monitor or qualified archaeologist unless the materials</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>have been determined to be non-unique archaeological resources, as defined in Public Resources Code Section 21083.1(h), by the qualified archaeologist. The qualified archaeologist shall determine if the resources are unique archaeological resources as defined in Public Resources Code Section 21083.2(g).</p> <p>Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of unique archaeological resources should occur as follows:</p> <ul style="list-style-type: none"> • The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. • When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Archaeologist. • Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by a Qualified Archaeologist. A report that describes the resource(s) and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Archaeologist according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. If appropriate, the report should also contain the Qualified Archaeologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply. 			
<p>4.4-2(b) Archaeological Assessment</p> <p>Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.</p> <ul style="list-style-type: none"> • <u>Archaeological, Paleontological, and Tribal Cultural Resources Notice</u>: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a 	<p>Prior to issuance of excavation or grading permits: verify receipt of acknowledgement from applicant.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>criminal violation to destroy those resources. These regulations include, but are not limited to: California Penal Code Section 622.5 provides the following: “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.”</p> <p>Public Resources Code Section 5097.5(a) states: “A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” A violation of Section 5097.5 is a misdemeanor subject to a fine up to \$10,000 and/or a year in jail, and potential restitution. The following best practices are recognized by archaeologists and environmental consultants to ensure archaeological resources are not damaged during grading, excavation, or other Ground Disturbance Activities:</p> <ul style="list-style-type: none"> • Records Search. A cultural resources records search should be requested from and conducted by the California Historical Resources Information System’s (CHRIS) South Central Coastal Information Center (SCCIC) located at California State University, Fullerton to determine whether any cultural resources have been previously identified on or within a 0.5-mile radius of the Project site. The results of this records search shall be used as an indicator of the archaeological sensitivity of the Project site. • A qualified archaeologist shall be retained and use all reasonable methods, consistent with professional standards and best practices, to determine the potential for archaeological resources to be present on the Project site. If the qualified archaeologist determines there is a medium to high potential that archaeological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the qualified archaeologist shall advise the Applicant and Owner to retain an Archaeological monitor to observe all Ground Disturbance 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>Activities within those areas identified as having a medium to high potential in order to identify any resources and avoid potential impacts to such resources.</p> <ul style="list-style-type: none"> Monitoring. An archaeological monitor should monitor excavation and grading activities in soils that have not been previously disturbed in order to identify and record any potential archaeological finds and avoid potential impacts to such resources. In the event of a possible archaeological discovery, the archaeological monitor shall notify a qualified archaeologist. The Archaeological monitor has the authority to temporarily halt earthwork activities. Handling, Evaluation, and Preservation. Any archaeological resource materials or associated materials that are uncovered shall not be moved or collected by anyone other than an archaeological monitor or qualified archaeologist unless they have been determined to be nonunique archaeological resources, as defined in Public Resources Code Section 21083.1(h) by a qualified archaeologist. A qualified archaeologist shall determine if the resources are unique archeological resources as defined in Public Resources Code Section 21083.2(g). <p>Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of unique archaeological resources should occur as follows:</p> <ul style="list-style-type: none"> The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a qualified archaeologist. If recommended by the qualified archaeologist, the resource(s) shall be curated by a public, non-profit institution with a research interest in the material, such as the Natural History Museum of Los Angeles County or another appropriate curatorial facility for educational purposes. 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<ul style="list-style-type: none"> Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by a qualified archaeologist. 			
<p>4.4-2(c) Zanja Madre</p> <p><u>CR2-1: Zanja Madre HAER Documentation</u></p> <p>a. Applicability Threshold</p> <p>Any project that requires a permit for grading or excavation and that is located within one mile of the currently known and mapped segments of the Zanja system.</p> <p>b. Standard</p> <p>Projects within 500 feet of the currently mapped known segments of the Zanja system (see Appendix F) have increased likelihood of encountering segments of the Zanja system during construction. The Zanja system includes the Zanja Madre and its outbranching secondary Zanja segments. If possible, segments of the Zanja system are uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a qualified archaeologist has been retained to inspect and evaluate the find. The qualified archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius.</p> <p>At a minimum, and even if avoided, should the find be determined to be related to the Zanja system, the qualified archaeologist shall prepare a memo and complete all relevant State of California Department of Parks and Recreation (DPR) DPR 523 forms documenting the find.</p> <p>If the qualified archaeologist, having evaluated the find, determines that the find retains integrity, documentation consistent with the standards and guidelines established the Historic American Engineering Record (HAER) shall be undertaken and transmitted to the Library of Congress before any alteration, demolition, construction, or removal activity may occur within the determined</p>	<p>During grading/construction: field as needed, verify that field verify that work is halted to assess possible archaeological resources and avoidance buffers are demarcated and enforced. Once find has been determined to be related to the Zanja system: review and approve the memo and all relevant DPR 523 forms documenting the find. Once find has been determined to retain integrity: review and approve the documentation that is consistent with HAER standards and guidelines. Submit documentation to the Library of Congress, SCCIC, and DCP prior to any alteration, demolition, construction, or removal activity within the avoidance area. Verify that appropriate treatments determined by the archaeologist for the find are implemented.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>avoidance area. Documentation shall include narrative records, measured drawings, and photographs in conformance with HAER Guidelines. The found segments shall also be mapped using Geographic Information Systems (GIS) or 3D mapping technology in order to contribute to the existing record of the location and extent of the Zanja system as a whole. At minimum, GIS data shall include the geographic coordinates and depth of all portions of the find. All records, including geographic data, georeferenced photographs, and information about the depth of the find shall be submitted to City Planning. Report documentation and GIS files shall additionally be provided to the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton.</p> <p>In addition to HAER documentation, if determined appropriate by the qualified archaeologist, one or more of the following specific treatments shall be developed and implemented based on potential California Register eligibility criteria or the significance of the find as a unique archaeological resource:</p> <ul style="list-style-type: none"> • Treatment Under Criterion 1: Treatment shall include interpretation of the Zanja Madre System for the public. The interpretive materials may include, but not be limited to, interpretive displays of photographs and drawings produced during the HAER documentation, signage at the Zanja Madre alignment, relocating preserved segments in a publicly accessible display, or other visual representations of Zanja alignments through appropriate means such as a dedicated internet website other online-based materials. At a minimum, the interpretive materials shall include photographs and drawings produced during the HAER documentation, and signage. These interpretive materials shall be employed as part of Project public outreach efforts that may include various forms of public exhibition and historic image reproduction. Additionally, the results of the historical and archaeological studies conducted for the Project shall be made available to the public through repositories such as the local main library branch or with identified non-profit historic groups interested in the subject matter. The interpretive materials shall be prepared at the expense of the Project applicant, by professionals meeting the Secretary of the Interior standards in history or 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>historical archaeology. The development of the interpretive materials shall consider any such materials already available to the public so that the development of new materials would add to the existing body of work on the historical Los Angeles water system, and to this end, shall be coordinated, to the extent feasible and to the satisfaction of the Department of City Planning. The interpretive materials shall include a consideration of the Zanja Madre segment located on the Project Site in relation to the entire Zanja system. The details of the interpretive materials, including the content and format, and the timing of their preparation, shall be completed to the satisfaction and subject to the approval of the Department of City Planning.</p> <ul style="list-style-type: none"> • Treatment Under Criterion 2: No additional work; archival research about important persons directly associated with the construction and use of Zanja Madre would be addressed as part of HAER documentation. • Treatment Under Criterion 3: No additional work; HAER documentation is sufficient. • Treatment Under Criterion 4: No additional work; archaeological data recovery and HAER documentation are sufficient. • Treatment as a unique archaeological resource, as defined by PRC Section 21083.2(g): Same as Criterion 1 treatment. 			
Impact – Paleontological Resources			
<p>4.6-6(a) Paleontological Resources</p> <p>For all discretionary projects that are excavating at least two subterranean levels below the ground surface, the following measures shall be conducted to identify and avoid potential impacts to such resources:</p> <ul style="list-style-type: none"> • Retention of Qualified Paleontologist. The project applicant shall retain a Qualified Paleontologist prior to excavations. The Qualified Paleontologist shall direct all mitigation measures related to paleontological resources. A qualified professional paleontologist is defined by the Society of Vertebrate Paleontology (SVP) standards (SVP 2010) as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable 	<p>Prior to project approval: verify that the applicant has conducted surveys and searches of databases and records and as needed, identified methods to avoid impacts to significant paleontological resources; measures on plans.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010).</p> <ul style="list-style-type: none"> • Paleontological Worker Environmental Awareness Program. Prior to the start of construction, the Qualified Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. • Paleontological Monitoring. Full-time paleontological monitoring shall be conducted during the initial phases of ground disturbing construction activities (i.e., grading, trenching, foundation work) within sediments with a high paleontological sensitivity. Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The duration and timing of the monitoring shall be determined by the Qualified Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City of Los Angeles. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources: 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<ul style="list-style-type: none"> ○ Salvage of Fossils. If fossils are discovered, the paleontological monitor shall have the authority to halt or temporarily divert construction equipment within 50 feet of the find until the monitor and/or lead paleontologist evaluate the discovery and determine if the fossil may be considered significant. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits. ○ Treatment of Paleontological Resources. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist. • Final Paleontological Mitigation Report. Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) including their scientific significance, and recommendations. The report shall be submitted to the City of Los Angeles. If the monitoring efforts produced fossils, a copy of the report shall also be submitted to the designated museum repository. 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>4.6-6(b) Treatment of Paleontological Resources</p> <p><u>CR3-1: Inadvertent Discovery</u></p> <p>a. Applicability Threshold Any Project that requires a permit for grading or excavation.</p> <p>b. Standard If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion. If resources found and have been properly assessed and processed: review and approve the report that documents assessment, processing of resources, and recommending actions.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>4.6-6(c) Notification of Intent to Excavate Language</p> <p>Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.</p> <p><u>Archaeological, Paleontological, and Tribal Cultural Resources Notice:</u> Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:</p> <ul style="list-style-type: none"> California Penal Code Section 622.5 provides the following: “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.” Public Resources Code Section 5097.5(a) provides: “A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” A violation of Section 5097.5 is a misdemeanor subject to a fine up to \$10,000 and/or a year in jail, and potential restitution. <p>The following best practices are recognized by paleontologists and environmental consultants to ensure paleontological resources are not damaged during construction or Ground Disturbance Activities:</p> <ul style="list-style-type: none"> A paleontological resources records search shall be requested from and conducted by the Natural History Museum of Los Angeles County to determine whether any paleontological resources have been previously identified on or near the Project site. The results of this records search shall be used as an indicator of the paleontological sensitivity of the Project site. A Qualified Paleontologist shall be retained and use all reasonable methods, consistent with professional standards and best practices, 	<p>Prior to issuance of excavation or grading permits: verify receipt of acknowledgement from applicant.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>to determine the potential for paleontological resources to be present on the Project site.</p> <ul style="list-style-type: none"> • If the Qualified Paleontologist determines there is a high potential that paleontological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor shall observe all Ground Disturbance Activities within those areas identified as having an undetermined or high potential in order to identify any resources and avoid potential impacts to such resources. In the event of a possible paleontological discovery, the Qualified Paleontologist or Paleontological Monitor shall have the authority to temporarily halt earthwork activities within an appropriate radius of the find, as determined by the Qualified Paleontologist, necessary to protect the resource or other potential resources on or near the Project site. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. • Prior to the start of construction, the Qualified Paleontologist or his/her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. • If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work should cease in the area of the find until a Qualified Paleontologist has evaluated the find in accordance with federal, state, and local guidelines, including the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP, 2010). • If fossils are discovered, a Qualified Paleontologist shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist has the authority to temporarily direct, divert or halt construction activity to ensure the fossil(s) can be 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>removed in a safe and timely manner. Handling and disposition of fossils is done at the direction and guidance of a Qualified Paleontologist.</p> <ul style="list-style-type: none"> Personnel of the Project should not collect or move any paleontological materials or associated materials. If cleared by the Qualified Paleontologist, construction activity may continue unimpeded on other portions of the Project site. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Qualified Paleontologist, and the Qualified Paleontologist clears the site for construction activity. 			
Impact – Hazards and Hazardous Materials			
<p>4.8-4(a) Database Review, Investigation, and Remediation.</p> <p><u>HM1-2: Environmental Site Assessment</u></p> <p>a. Applicability Threshold</p> <p>Any Project that requires a grading, excavation, or building permit from LADBS and which is:</p> <ul style="list-style-type: none"> Located on or within 500 feet of a Hazardous Materials site listed in any of the following databases: <ul style="list-style-type: none"> State Water Resources Control Board GeoTracker (refer to https://geotracker.waterboards.ca.gov); DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public); DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov); LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records); Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests); 	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion. Prior to issuance of grading, excavation, or building permits: review and approve the soil samples submitted documenting levels of lead and arsenic on site. If no recognized elevated levels are identified, no further documentation is required. If the soil sample results indicate the need for remediation, review and approve a remediation plan. If oversight or approval from a regulatory agency is required, verify agency sign off on remediation plan and that a No Further Action letter has been issued.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<ul style="list-style-type: none"> ○ SCAQMD Facility Information Detail (refer to https://xappprod.aqmd.gov/find); or • Located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or • Located in an Oil Drilling District (O) or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by the California Geologic Energy Management Division (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or • Located on land currently or previously designated with an industrial use class or industrial zoning, in whole or in part; or • Located on land currently or previously used for a gas station or dry cleaning facility. <p>Or:</p> <ul style="list-style-type: none"> • The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station or dry cleaner. <p>And:</p> <ul style="list-style-type: none"> • The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or site conditions. <p>b. Standard</p> <p>A Phase I Environmental Site Assessment shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials' (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including</p>			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.</p> <p>If the Phase I identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I, a Phase II Environmental Site Assessment shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II Environmental Site Assessment(s) shall be maintained pursuant to the proof of compliance requirements in Section I.D.6 and made available for review and inclusion in the case file by the appropriate regulatory agency, such as the State Water Resources Control Board, the State Department of Toxic Substances Control, or the LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II Environmental Site Assessment or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.</p>			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>4.8-4(b) Notification of Intent to Excavate Language</p> <p>For all discretionary projects not subject to Mitigation Measure 4.8-4(a) that are seeking excavation or grading permits, the Department of Building and Safety shall obtain the following acknowledgement and affidavit from the applicant:</p> <ul style="list-style-type: none"> No known recognized soil or groundwater contamination exceeding regulatory action levels is present on-site. If contamination exceeding regulatory action levels is discovered during excavation, grading, or construction activities, the applicant and his/her/its contractors shall provide evidence of compliance with all applicable federal, state and local regulations for remediation of hazardous materials, including but not limited to notifying the appropriate oversight agency (e.g., DTSC, the Water Board, County Environmental Health) of the contamination, hiring a qualified environmental professional to conduct the necessary assessments and abatement (including soil sampling, preparing a remediation plan to adequately abate the hazardous materials, and ultimately obtaining necessary clearance letters from the oversight agency), and issuance of a No Further Action letter, if applicable, before obtaining an occupancy permit. If oversight or approval by a regulatory agency is not required, a qualified environmental professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained pursuant to appropriate proof of compliance requirements. 	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion. Prior to issuance of grading, excavation, or building permits: review and approve the soil samples submitted documenting levels of lead and arsenic on site. If no recognized elevated levels are identified, no further documentation is required. If the soil sample results indicate the need for remediation, review and approve a remediation plan. If oversight or approval from a regulatory agency is required, verify agency sign off on remediation plan and that a No Further Action letter has been issued.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
Impact – Noise			
<p>4.11-1 Project-Specific Noise Study.</p> <p><u>NV1-6: Noise Study</u></p> <p>a. Applicability Threshold</p> <p>Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS; are located within 500 feet of Noise-Sensitive Uses; and have one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Two or more subterranean levels; • 20,000 cubic yards or more of excavated material • Simultaneous use of five or more pieces of construction equipment; or • Construction duration (excluding architectural coatings) of 18 months or more. <p>Or any Project whose construction activities involve impact pile driving or the use of 300 horsepower equipment.</p> <p>b. Standard</p> <p>A Noise Study prepared by a Qualified Noise Expert shall be required and prepared prior to obtaining any permit by LADBS. The Noise Study shall characterize expected sources of earthwork and construction noise that may affect identified Noise-Sensitive Uses, quantify expected noise levels at these Noise-Sensitive Uses, and recommend measures to reduce noise exposure to the extent noise reduction measures are available and feasible, and to demonstrate compliance with any noise requirements in the LAMC. Specifically, the Noise Study shall identify noise reduction devices or techniques to reduce noise levels in accordance with accepted industry practices and in compliance with LAMC standards. Noise reduction devices or techniques shall include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. The Noise Study shall identify anticipated noise reductions at Noise-Sensitive Uses associated with the noise reduction measures. Applicants and Owners shall be required to implement and comply with all measures identified and recommended in the Noise Study.</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
The Noise Study and copies of any contractor agreements shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.			
<p>4.11-2(a) Vibration Control Plan</p> <p><u>NV2-1: Baseline Survey and Vibration Control Plan</u></p> <p>a. Applicability Threshold</p> <p>Any Project, with the exception of Projects limited to the construction of 2,000 square feet or less of floor area dedicated to residential uses, whose earthwork or construction activities: (1) involve the use of construction equipment, including Heavy Construction Equipment, that produces 0.12 PPV or more of vibration at a distance of 25 feet (see reference vibration levels in Appendix F); (2) require a permit from LADBS; and (3) which occur:</p> <ul style="list-style-type: none"> • Within 25 feet of any building extremely susceptible to vibration damage, including unreinforced masonry buildings, tilt-up concrete wall buildings, wood-frame multi-story buildings with soft, weak or open front walls, and non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey; or • Within 15 feet of non-engineered timber and masonry buildings. <p>Or any Project whose construction activities involve the use of pile drivers within 135 feet of any building extremely susceptible to vibration damage, including existing unreinforced masonry buildings, existing tilt-up concrete wall buildings, existing wood-frame multi-story buildings with soft, weak or open front walls, and existing non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey.</p> <p>b. Standard</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>Prior to demolition, grading/excavation, or construction, a Qualified Structural Engineer shall prepare a survey establishing baseline structural conditions of potentially affected structures and a Vibration Control Plan, which shall include methods to minimize vibration, including, but not limited to:</p> <ul style="list-style-type: none"> • A visual inspection of the potentially affected structures to document (by video and/or photography) the apparent physical condition of the building (e.g., cracks, broken panes, etc.). • A shoring design to protect the identified structures from potential damage; • Use of drilled piles or a sonic vibratory pile driver rather than impact pile driving, when the use of vibrating equipment is unavoidable; • Use of rubber-tired equipment rather than metal-tracked equipment; and • Avoiding the use of vibrating equipment when allowed by best engineering practice. 			
<p>4.11-2(b) Best Management Practices for Vibration</p> <p>For projects that are not required to comply with mitigation measure 4.11-2(a), the City shall notify developers of the following best management practices to reduce damage to vibration-sensitive uses:</p> <ul style="list-style-type: none"> • Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or the use of a sonic vibratory pile driver are alternatives that shall be utilized where geological conditions permit their use. • Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. <p>The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices.</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
Impact – Tribal Cultural Resources			
<p>4.16-1(a) Unanticipated Discovery of Tribal Cultural Resources CR4: Inadvertent Discovery</p> <p>a. Applicability Threshold Any Project that requires a permit for grading or excavation.</p> <p>b. Standard If a possible tribal cultural resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Tribal Monitor or Archaeological Monitor has been retained to evaluate the find.</p> <p>Following discovery, the Applicant or Owner shall immediately contact all Native American tribes that have informed the City of Los Angeles they are traditionally and culturally affiliated with the geographic area of the Project, as well as the Department of City Planning, Office of Historic Resources (OHR). If a Qualified Tribal Monitor or Archaeological Monitor determines, pursuant to Public Resources Code Section 21074(a)(2), that the object or artifact appears to be a potential tribal cultural resource, in its discretion and supported by substantial evidence, the Applicant and Owner shall provide any affected tribe a reasonable period of time, not less than five business days, to conduct a site visit and make recommendations to the Applicant or Owner and OHR regarding the monitoring of future Ground Disturbance Activities and the treatment and disposition of any discovered tribal cultural resources. The Applicant or Owner shall implement the tribe's recommendations if the Qualified Tribal Monitor or Archaeological Monitor reasonably concludes such recommendations are reasonable and feasible.</p> <p>Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of tribal cultural resources should occur as follows:</p> <ul style="list-style-type: none"> • The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. • When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have 	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Tribal Monitor or Qualified Archaeologist.</p> <p>All collected artifacts and fieldwork notes, if not human remains or other mortuary objects, shall be curated at the Natural History Museum of Los Angeles County or another appropriate curatorial facility for educational purposes. If cleared by the Qualified Tribal Monitor or Archaeological Monitor, Ground Disturbance Activities may continue unimpeded on other portions of the site. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed. A report that describes the resource and its disposition, as well as the assessment methodology shall be prepared by the Qualified Tribal Monitor or Archaeological Monitor, according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. A copy of the report shall be submitted to OHR, the South Central Coastal Information Center at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File. If requested by the City, OHR may review and approve any monitoring or mitigation plan prior to implementation.</p>			
<p>4.16-1(b) Native American Consultation and Monitoring for Discretionary Projects</p> <p>All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area. Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of projects in that area. Should projects have potential to impact cultural resources, as</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground disturbing activities for the Project, including any archaeological testing. The CRMP shall provide details regarding the process for infield treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.</p>			
<p>4.16-1(c) Notices for Non-Discretionary Projects</p> <p>Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.</p> <p><u>Archaeological, Paleontological, and Tribal Cultural Resources Notice:</u> Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:</p> <ul style="list-style-type: none"> California Penal Code Section 622.5 provides the following: “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value whether situated on private lands or within any public park or place, is guilty of a misdemeanor.” <p>Public Resources Code Section 5097.5(a) provides:</p> <p>“A person shall not knowingly or willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archeological, paleontological or historic feature, situated on public lands, except with the express written permission of the public agency having jurisdiction over the lands.” A violation of Section 5097.5 is a misdemeanor subject to a fine up to \$10,000 and/or a year in jail, and potential restitution. The following best practices are recognized by tribal monitors and environmental consultants to ensure that tribal</p>	<p>Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.</p>	<p>Applicant for individual project</p>	<p>City of Los Angeles, Department of Building and Safety</p>

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>cultural resources are not damaged during grading, excavation, or other Ground Disturbance Activities:</p> <ul style="list-style-type: none"> • A Sacred Lands File (SLF) records search shall be requested from and conducted by the California Native American Heritage Commission (NAHC) to determine whether cultural resources associated with any Native American tribe(s) with traditional lands or cultural places located within or near the Project site have been previously identified or whether the Project area is considered sensitive for the presence of tribal cultural resources. • All tribes listed on the NAHC's Native American Contact List included with the SLF search shall be contacted, informed of the Project, and given an opportunity to provide input. If the tribe provides substantial evidence of a potential discovery of tribal cultural resources within the Project site and requests monitoring of Project excavation, grading or other Ground Disturbance Activities, a Qualified Tribal Monitor or Archeological Monitor shall be retained. • A Qualified Tribal Monitor or Archeological Monitor shall observe Ground Disturbance Activities within those areas identified in the records search as sensitive for the presence of tribal cultural resources in order to identify resources and avoid potential impacts to such resources. In the event of a possible discovery of a tribal cultural resource, the Qualified Tribal Monitor or Archeological Monitor shall have the authority to temporarily halt earthwork activities within the appropriate radius of the find, as determined by the Qualified Tribal Monitor or Archeological Monitor to ensure the find or any other potential tribal cultural resources on or near the Project site is not damaged. • If tribal resources are uncovered (in either a previously disturbed or undisturbed area), all work should cease in the appropriate radius determined by the Qualified Tribal Monitor or Archeological Monitor and in accordance with federal, state, and local guidelines. • Any find shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Qualified 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>Tribal Monitor or Archeological Monitor and in accordance with federal, state, and local guidelines.</p> <ul style="list-style-type: none"> • The location of the tribal cultural resources find and the type and nature of the find should not be published beyond providing it to public agencies with jurisdiction or responsibilities related any affected tribal resources. • Following discovery, the applicant or owner shall immediately contact all Native American tribes that have informed the City of Los Angeles they are traditionally and culturally affiliated with the geographic area pf the Project, as well as the Department of City Planning, Office of Historical Resources (OHR). • The applicant or owner shall provide any affected tribe a reasonable period of time, not less than five business days, to conduct a site visit and make recommendations to the applicant or owner regarding the monitoring of future ground disturbance activities and the treatment and disposition of any discovered tribal cultural resources. • The applicant or owner shall implement the tribe's recommendations if the Qualified Tribal Monitor or Archeological Monitor reasonably concludes such recommendations are reasonable and feasible and determined to be supported with substantial evidence. • Consistent with Public Resources Code 21083.2, the handling, treatment, preservation, and recordation of tribal cultural resources shall occur as follows: • The find shall be preserved in place or left in an undisturbed state unless the Project would damage the resource. • When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study shall occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Tribal Monitor or Archeological Monitor. • All collected artifacts and fieldwork notes, if not human remains or other mortuary objects, shall be curated at the Natural History 			

Mitigation Measure	Monitoring Phase and Monitoring Actions ¹	Implementing Party	Enforcement and Monitoring Entity
<p>Museum of Los Angeles County or another appropriate curator facility.</p> <ul style="list-style-type: none"> If cleared by the Qualified Tribal Monitor or Archeological Monitor, Ground Disturbance Activities may continue unimpeded on other portions of the site. Ground Disturbance Activities in the area where the resource(s) were found may commence once the identified resources are properly assessed and processed. 			
Impact – Utilities and Services			
<p>A Water Supply Assessment (WSA), prepared by a qualified water expert to meet the requirements herein, shall be required and furnished to the City for inclusion in any environmental documentation for certain developments (as defined in Water Code 10912[a]) in the Project Area subject to California Environmental Quality Act. Under SB 221, approval by the City of certain residential subdivisions should require an affirmative written verification of sufficient water supplies. The WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. The WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions.</p>	<p>Prior to issuance of grading or building permits, submittal of a WSA resolution approved by the Los Angeles Board of Water and Power Commissioners for the individual project(s).</p>	<p>Applicant for individual project and Los Angeles Department of Water and Power</p>	<p>City of Los Angeles, Department of Building and Safety</p>

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Appendices

Final EIR

Appendix A

CASP Update December 2023

CORNFIELD ARROYO SECO SPECIFIC PLAN

December 2023 Draft



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Chapter 1

Introduction

A. Administration

1. Authority

Pursuant to Div. 8.3. (*Special Districts*), Sec. 13B.1.2. (*Specific Plan Adoption/Amendment*), and Sec. 13B.1.3. (*Zoning Code Amendment*) of Chapter 1A (Zoning Code) of the Los Angeles Municipal Code (LAMC), the City Council hereby establishes a Special District that utilizes the provisions of this Cornfield Arroyo Seco Specific Plan (“CASP” or “Specific Plan”) as the vehicle for regulatory measures to achieve the planning objectives of the designated area.

2. Boundaries

The Special District shall apply to all lots located in whole or in part within the boundaries indicated on **Map 1-1 (Plan Boundary Map)** as specifically set forth in this Specific Plan, except for lots located within the Freeway Special District (“FWY”). The boundaries of each General Plan land use designation are illustrated on **Map 1-2 (General Plan Land Use Designation Map)**.



Plan Boundary Map 1-1

Plan Boundary

General Plan Land Use Designation Map 1-2

- Hybrid Industrial*
- Public Facilities*
- Open Space*
- FWY

*Corresponds with CASP Special District



3. Purposes

The purposes of this Specific Plan are as follows:

- a. Establish regulatory measures for the designated Special District.
- b. Implement the Downtown Los Angeles and Northeast Los Angeles Community Plans.
- c. Increase the production of affordable, mixed-income, and permanent supportive housing within the Specific Plan Area.
- d. Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities.
- e. Establish Specific Plan standards, processes, and procedures that are intuitive and transparent.
- f. Preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, new productive uses, and employment spaces, such as light industrial and general commercial uses.
- g. Provide a range of housing types and price levels that offer a full range of choices for people of diverse ages, ethnicities, household sizes, and incomes.
- h. Provide shops and services for everyday needs, including groceries, day care, restaurants, banks and drug stores, within walking distance from home or work.
- i. Facilitate pedestrian mobility, encourage bicycle use, and provide access to a variety of transportation options including frequent light rail and bus connections, shared vehicles, and bicycles.
- j. Lessen dependence on automobiles, and thereby reduce vehicle emissions, while enhancing the personal health of residents, employees, and visitors.
- k. Respect historically significant buildings, including massing and scale, while at the same time encouraging innovative architectural design that expresses the identity of contemporary Los Angeles.

- l. Reduce the use of energy and potable water, improve the ecology surrounding the Los Angeles River Watershed and Arroyo Seco, and create connections from the community to the River and Arroyo Seco.
- m. Provide public open space, including parks, courtyards, and plazas, within walking distance of residents and employees.
- n. Clean up sources of air pollution and soil contamination, while ensuring that the communities disproportionately burdened by environmental harms and risks are meaningfully involved in the process.

4. Definitions

The general rules and definitions as set forth in Article 14 (*General Rules*) of Chapter 1A (Zoning Code) of the LAMC shall apply to this Specific Plan.

Additionally, whenever the following terms are used in this Specific Plan, they shall be construed as defined herein. The definitions set forth in this ordinance that reference, or incorporate by reference, other statutes or ordinances are deemed to be amended when those statutes or ordinances are amended or renumbered from time to time.

“100 Percent Affordable Housing” shall mean a project in which 100 percent of the residential dwelling units, excluding any manager unit(s), are Restricted Affordable Units, as defined in Div. 14.2. (*Glossary*) of Chapter 1A (Zoning Code) of the LAMC.

“Mixed-income Housing” shall mean a project comprising a mix of market-rate and Restricted Affordable Units.

“Legacy Small Business” shall mean 1) any business that is on the Citywide Legacy Business Registry, or 2) a privately-owned corporation, cooperative, non-profit, social enterprise, or other entity that serves the neighborhood in which it is located, is not franchised or affiliated with a national chain, has been in continuous operation within a 2 mile radius of the project site within the City for at least 10 years with no break in its operations exceeding two years, and meets at least two of the following four standards:

- a. Has no more than 50 employees/shareholders;
- b. The business includes employees who can speak a language other than English in order to serve linguistically isolated members of the community;

- c. Accepts government issued assistance such as Electronic Benefits Transfer (EBT);
- d. Pays employees wages equivalent to or greater than those specified in Sec. 10.37.2 (Payment of Minimum Compensation to Employees) of Article 11 (Living Wage) of the Los Angeles Administrative Code.

5. Relationship to Other Zoning Regulations

- a. This Specific Plan contains self-contained zoning regulations pursuant to Div. 8.1. (*Specific Plans*) and Div. 8.3. (*Special Districts*) of Chapter 1A (Zoning Code) of the LAMC. The regulations of this Specific Plan supersede the Zoning Districts outlined in Part 2B (Form Districts), Part 3B (Frontage Districts), Part 4B (Development Standards Districts), Part 5B (Use Districts), and Part 6B (Density Districts) of Chapter 1A. All other provisions of Chapter 1A, including rules and non-string articles, apply to the properties within the boundaries of this Specific Plan.
- b. The Specific Plan ("CASP") is the zone of the lot, as outlined in Sec. 1.5.2.A.4. (*Special Districts*) of Chapter 1A (Zoning Code) of the LAMC, for the properties located within its boundaries. It is intended, therefore, to serve as a zoning designation for purposes of California Public Resources Code Section 21083.3.
- c. Chapter 1 (General Provisions and Zoning) of the LAMC does not apply to the properties within the boundaries of this Specific Plan.
- d. All references to sections of the LAMC shall be deemed references to those sections as they are amended, modified, or renumbered from time to time. At the discretion of the Director, the Plan may be administratively modified for clarity to reflect any such amendments, modifications, or renumbering.
- e. **Reconciling Regulations.** Refer to Sec. 8.3.1.B.3. (*Reconciling Provisions*) of Chapter 1A (Zoning Code) of the LAMC. Wherever this Specific Plan contains provisions that establish regulations that are different from, more restrictive or more permissive than would be allowed or required pursuant to the provisions contained in the LAMC, this Specific Plan shall prevail and supersede the applicable provisions of the LAMC and those relevant ordinances.

6. Uses and Buildings Made Nonconforming by This Plan

Any legally existing uses, buildings, or structures that are made nonconforming by the establishment of this Specific Plan shall be deemed to be legal nonconforming uses, buildings, or structures and may continue to exist, in accordance with Division 12.1. (*General Provisions*) of Chapter 1A (Zoning Code) of the LAMC.

7. Severability

If any portion, subsection, sentence, clause or phrase of this Specific Plan is for any reason held by a court of competent jurisdiction to be invalid, such a decision shall not affect the validity of the remaining portions of this Specific Plan. The City Council hereby declares that it would have passed this Specific Plan and each portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses, or phrases may be declared invalid.



B. Applicability of the Specific Plan

1. Definition of a Project

Only the following Project Activities as set forth in Sec. 14.1.15. (*Project Activities*) of Chapter 1A (Zoning Code) of the LAMC shall constitute a Project in the Specific Plan:

- a. New Construction
- b. Major Demolition
- c. Facade Modification
- d. Use Modification

2. Applicability of Specific Plan Regulations

- a. Any Project Activity that constitutes a Project, in whole or in part, shall be done so in conformance with the Specific Plan's regulations as set forth in the applicability provisions of each Specific Plan chapter.
- b. The provisions of this Specific Plan apply to all buildings, structures, or land owned, operated or controlled by any person, corporation, or, to the extent permitted by law, governmental agency.
- c. In the event that any provision of this Specific Plan conflicts with LAMC Chapter 5, Article 7 (Fire Code), then LAMC Chapter 5, Article 7 (Fire Code) shall prevail.

C. Review Procedures

1. Prohibition of Issuance of Permits Prior to Specific Plan Review

The Department of Building and Safety shall not issue any building, grading, demolition, or change of use permit for any Project within the Specific Plan boundaries (in whole or in part) unless the Project has been reviewed pursuant to Subdivision 4 (Specific Plan Review) below.

2. Demolition

No demolition permit shall be issued for any Project unless building permits for a replacement development on the site have been issued, and any necessary land use entitlements have been granted.

- a. Notwithstanding the above this prohibition shall not apply to any structure deemed hazardous by the Department of Building and Safety.
- b. Furthermore, this prohibition shall not apply to structures that are considered uninhabitable.

3. Filing Requirements for Multiple Approvals

When an applicant applies for any discretionary approval for a property located (in whole or in part) within the Specific Plan boundaries, the applicant shall also apply for a Specific Plan Review.

4. Specific Plan Review

- a. **Administrative Review.** The Director shall grant an Administrative Review pursuant to Sec. 13B.3.1. (*Administrative Review*) of Chapter 1A (Zoning Code) of the LAMC, after reviewing the Project and determining that it is in compliance with all applicable provisions of the Specific Plan as indicated by a plan stamped by the Department of City Planning.
- b. **Scope of Review.** In reviewing a Project for an Administrative Review, the Director shall review the Project for compliance with those regulations that are applicable to the proposed scope of construction or use.

5. Project Compliance

A Project that has one or more of the following characteristics shall obtain Project Compliance pursuant to Section 13B.4.2. (*Project Compliance*) of Chapter 1A, in lieu of Specific Plan Review.

- a. Any development project which adds at least 500,000 square feet of nonresidential floor area.
- b. Any development project which adds at least 500 dwelling units.
- c. Any development project that includes drive-through lanes which results in a net increase of 500 or more average daily trips.
- d. Any change of use which results in a net increase of 1,000 or more average daily trips.

6. Project Adjustment

Refer to Sec. 13B.4.4. (*Project Adjustment*) of Chapter 1A (Zoning Code) of the LAMC.

7. Project Exception

Refer to Sec. 13B.4.5. (*Project Exception*) of Chapter 1A (Zoning Code) of the LAMC.

8. Specific Plan Interpretation

When there is a lack of clarity in the meaning of the Specific Plan's regulations, the Director of Planning may issue a written interpretation of the Specific Plan's regulations either upon application by an applicant or upon the Director of Planning's own initiation. Refer to Sec. 13B.4.6. (*Specific Plan Interpretation*) of Chapter 1A (Zoning Code) of the LAMC.

9. Conditional Use Permit

Refer to Sec. 13B.2.1. (*Class 1 Conditional Use Permit*), Sec. 13B.2.2. (*Class 2 Conditional Use Permit*), and Sec. 13B.2.3. (*Class 3 Conditional Use Permit*) of Chapter 1A (Zoning Code) of the LAMC.

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Chapter 2

Form

This Chapter establishes Form Districts to regulate the placement, scale, and intensity of buildings and structures on a lot in order to ensure building forms are compatible with their context and consistent with community goals.

A. Form Applicability

1. General

All Projects filed after the effective date of this Specific Plan shall comply with the Form District standards as further specified below.

2. Applicability

Refer to Sec. 2A.2.2. (*Form Applicability*) of Chapter 1A (Zoning Code) of the LAMC for the Form Rule Categories that apply to a Project based on the types of Project Activities involved.

3. Form Rules

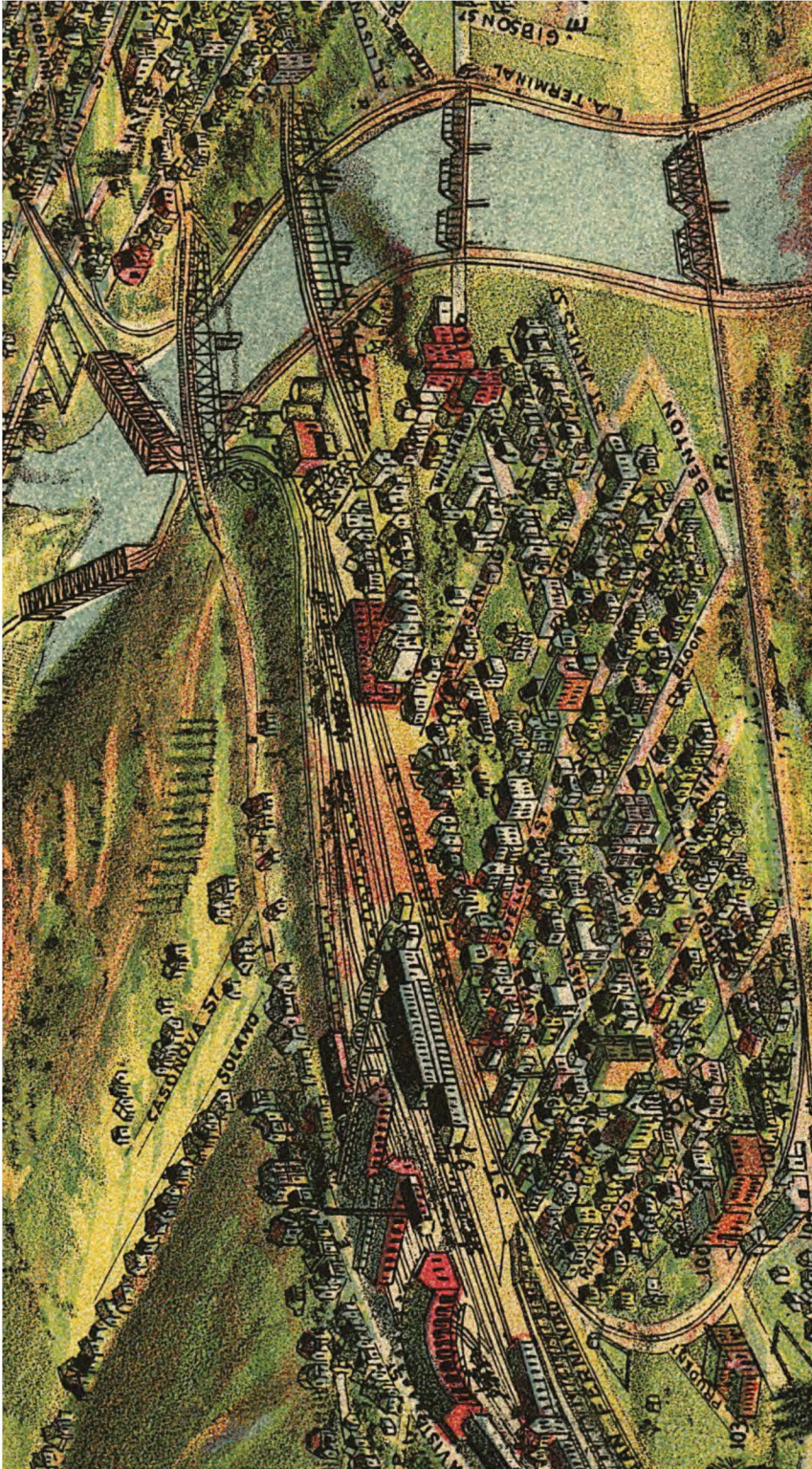
Refer to Part 2C. (*Form Rules*) of Chapter 1A (Zoning Code) of the LAMC for the Intent, Applicability, Standards, Measurement, Exceptions, and Relief of each Form Rule Category, except as modified in Paragraph a. (Relief) below.

- a. **Relief.** Where relief may be requested pursuant to the Form Rules, Sec. 13B.4.4. (*Project Adjustment*) of Chapter 1A (Zoning Code) of the LAMC shall substitute for Sec. 13B.5.2. (*Adjustments*) of Chapter 1A, and Sec. 13B.4.5. (*Project Exception*) of Chapter 1A shall substitute for Sec. 13B.5.3. (*Variance*) of Chapter 1A.

B. Form Districts

1. Form Districts Map

The Form District for each property within the Specific Plan is set forth in **Map 2-1 (Form Districts Map)**.





2. Form Districts Table

The regulations for each Form District are provided for in **Table 2-1 (Form Districts Table)**.

Table 2-1: Form District Table

Metric	CASP-FOR Low-Rise Medium	CASP-F01 Low-Rise Broad	CASP-F02 Mid-Rise Broad	CASP-F03 Mid-Rise Broad
Lot Size				
Lot Area (min)	n/a	n/a	n/a	n/a
Lot Width (min)	25'	25'	25'	25'
Coverage				
Building Coverage (max)	50%	85%	85%	85%
Building Setbacks				
Primary Street (min)	0'	0'	0'	0'
Side Street (min)	0'	0'	0'	0'
Side (min)	0'	0'	0'	0'
Rear (min)	0'	0'	0'	0'
Alley (min)	0'	0'	0'	0'
Special: River (min)	10'	10'	10'	10'
Amenity				
Lot Amenity Space	15%	15%	15%	15%
Residential Amenity Space	10%	10%	10%	10%

Table 2-1: Form District Table

Metric	CASP-FOR Low-Rise Medium	CASP-F01 Low-Rise Broad	CASP-F02 Mid-Rise Broad	CASP-F03 Mid-Rise Broad
Floor Area Ratio and Height				
Floor Area Ratio (FAR)	-	-	-	-
Base (max)	1.5	1.5	1.5	1.5
Bonus (max)	4.0	3.0	4.5	5.0
Height in Feet	n/a	n/a	n/a	n/a
Height in Stories (max)	7	-	-	-
Height in Stories (min)	-	-	-	-
Upper-Story Bulk				
District Boundary Transition				
Abutting District Allowed Height (max)	-	45'	-	-
Stories without Height Transition (max)	-	2	-	-
Transition Depth (min)	-	20'	-	-
Building Mass				
Building Width (max)	160'	280'	280'	280'
Building Break (min)	15'	25'	25'	25'

羅省貿易公司 WHOLESALE FOOD & RESTAURANT SUPPLY LAX-C Inc. แล

E-Sea Fresh Restaurant



Chapter 3

Frontage

This Chapter establishes Frontage Districts to regulate the portions of a lot and exterior building facades that affect the public realm. Frontage Districts help ensure that projects respond to the public realm in a contextually appropriate manner.

A. Frontage Applicability

1. General

All Projects filed after the effective date of this Specific Plan shall comply with the Frontage District standards as further specified below.

2. Applicability

Refer to Sec. 3A.2.2. (*Frontage Applicability*) of Chapter 1A (Zoning Code) of the LAMC for the Frontage Rule Categories that apply to a Project based on the types of Project Activities involved.

3. Frontage Rules

Refer to Part 3C. (*General Frontage Rules*) of Chapter 1A (Zoning Code) of the LAMC for the Intent, Applicability, Standards, Measurement, and Relief of each Frontage Rule Category, except as modified by Paragraph a. (Relief) below.

- a. **Relief.** Where relief may be requested pursuant to the Frontage Rules, Sec. 13.B.4.4. (*Project Adjustment*) of Chapter 1A (Zoning Code) of the LAMC shall substitute for Sec. 13B.5.2. (*Adjustments*) of Chapter 1A, and Sec. 13B.4.5. (*Project Exception*) of Chapter 1A shall substitute for Sec. 13B.5.3. (*Variance*) of Chapter 1A.

B. Frontage Districts

1. Frontage Districts Map

The Frontage District for each property within the Specific Plan is set forth in **Map 3-1 (Frontage Districts Map)**.



2. Frontage Districts Table

The regulations for each Frontage District are provided for in **Table 3-1 (Frontage Districts Table)**.

Table 3-1: Frontage District Table

Metric	CASP-FR1			CASP-FR2		CASP-FR3	
	Primary	Side	River	Primary	Side	Primary	Side
Build To							
Applicable Stories (min)	1	1	1	1	1	1	1
Build-To Depth (max)	n/a	n/a	n/a	10'	15'	10'	15'
Build-To Width (min)	n/a	n/a	n/a	60%	40%	90%	70%
Pedestrian Amenity Allowance (max)	n/a	n/a	n/a	20%	n/a	40%	30%
Parking							
Parking Setback (min)	5'	5'	20'	20'	5'	20'	5'
Landscaping							
Frontage Planting Area (min)	30%	30%	75%	30%	30%	30%	30%
Frontage Yard Fence & Wall Type Allowed	A4	A4	A3	A3	A3	A2	A2
Transparency							
Transparent Area							
Ground Story (min)	n/a	n/a	20%	25%	20%	50%	40%
Upper Stories (min)	n/a	n/a	20%	20%	20%	20%	20%
Active Wall Spacing (max)	n/a	n/a	50'	50'	50'	20'	30'

Table 3-1: Frontage District Table

Metric	CASP-FR1			CASP-FR2		CASP-FR3	
	Primary	Side	River	Primary	Side	Primary	Side
Entrances							
Street-Facing Entrance	Required	n/a	Required	Required	n/a	Required	n/a
Entrance Spacing (max)	n/a	n/a	100'	75'	100'	50'	100'
Required Entry Feature	No	No	No	No	No	No	No
Ground Story							
Ground Story Height (min)							
Residential	n/a	n/a	n/a	10'	10'	10'	10'
Nonresidential	n/a	n/a	n/a	10'	10'	10'	10'
Ground Floor Elevation (min/max)							
Residential	n/a	n/a	n/a	-2'/5'	-2'/5'	-2'/2'	-2'/2'
Nonresidential	n/a	n/a	n/a	n/a	n/a	n/a	n/a

CRELLIN MACHINE CO.
SCREW MACHINE PRODUCTS



Chapter 4

Development Standards

This Chapter establishes Development Standards Districts to regulate site design, including location and characteristics of access, parking, landscape and other site features. Development Standards Districts consist of a combination of regulations that are appropriate to a variety of contexts.

A. Development Standards Applicability

1. General

All Projects filed after the effective date of this Specific Plan shall comply with the Development Standards as further specified below.

2. Applicability

Refer to Sec. 4A.2.2. (*Development Standards Applicability*) of Chapter 1A (Zoning Code) of the LAMC for the Development Standards Rule Categories that apply to a Project based on the types of Project Activities involved.

3. Development Standards Rules

Refer to Part 4C. (*Development Standards Rules*) of Chapter 1A (Zoning Code) of the LAMC for the Intent, Applicability, Standards, Measurement, and Relief of each Development Standards Rule Category, except as modified in Paragraph a. (Relief) and Paragraph b. (Development Review) below.

- a. **Relief.** Where relief may be requested pursuant to the Development Standards Rules, Sec. 13.B.4.4 (*Project Adjustment*) of Chapter 1A (Zoning Code) of the LAMC shall substitute for Sec. 13B.5.1. (*Alternative Compliance*) and Sec. 13B.5.2. (*Adjustments*) of Chapter 1A, and Sec. 13B.4.5. (*Project Exception*) of Chapter 1A shall substitute for Section 13B.5.3. (*Variance*) of Chapter 1A.
- b. **Development Review.** In lieu of Div. 4C.14. (*Development Review*) of Chapter 1A (Zoning Code) of the LAMC, Projects that conform with the Specific Plan and receive Specific Plan Review, or Project Compliance, shall be exempt from Development Review.

B. Development Standards Districts

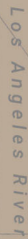
1. Development Standards Districts Map

The Development Standards District for each property within the Specific Plan is set forth in **Map 4-1 (Development Standards Districts Map)**.



District 4*

*See Part 4B of Chapter 1A of the LAMC.



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Chapter 5

Use

This Chapter establishes Use Districts and Use Standards to regulate the activities on a lot, and to mitigate any potential impacts within a lot and on surrounding property as a result of those activities.

A. Use Applicability

1. General

All Projects filed after the effective date of this Specific Plan shall comply with the Use District standards as further specified below.

2. Applicability

Refer to Sec. 5A.2.2. (*Use Applicability*) of Chapter 1A (Zoning Code) of the LAMC for the Use Rule Categories that apply to a Project based on the types of Project Activities involved.

3. Use Rules

Refer to Part 5C. (*Use Rules*) of Chapter 1A (Zoning Code) of the LAMC for Use Definitions, Use Permissions, Use Standards, and Special Use Programs.

B. Use Districts

1. Use Districts Map

The Use District for each property within the Specific Plan is set forth in **Map 5-1 (Use Districts Map)**.



Use Districts Map 5-1

- Urban Village
- Urban Center
- Urban Innovation
- Public 2 (P2)*
- Open Space 1 (OS1)*
- FWY

*See Part 5B of Chapter 1A of the LAMC.



C. Urban Village Use District

1. Intent

Urban Village is an Industrial-Mixed Use District intended to expand housing opportunities that include affordable units, while accommodating employment uses and community supporting services.

2. Allowed Uses & Use Limitations

Use	Permission	Use Standard	Specification
Residential	*	Use Separation (min)	
		Heavy Industrial	50'
		Relief	C1
Dwelling	P*	(see Residential)	
Household Business:			
Family Child Care	P*	In conjunction with:	Dwelling
Home Occupation	P*	In conjunction with:	Dwelling
		Hours of operation (early/late)	8AM/8PM
		Client visits per hour (max)	1
		Supplemental standards	CASP Sec. 5.F.2.
Home Sharing	P*	In conjunction with:	Dwelling
		Special use program	Ch. 1A Sec. 5C.4.4.
Joint Living & Work Quarters	P*	(see Residential)	
Live/Work	P*	(see Residential)	
Mobilehome Park	--		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Supportive Housing:			
General	P*	(see Residential)	
Medical Care	P*	(see Residential)	
Transitional Shelter	P*	(see Residential)	
Public & Institutional			
Cemetery	--		
Civic Facility:			
Local	P		
Regional	C3		
Detention Facility	--		
Fleet Services	P		
Medical:			
Local	C2		
Regional	C3		
Office, Government	P		
Parking	P	In conjunction with:	Other allowed use
Public Safety Facility	P		
Religious Assembly	C2		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
School:			
Preschool/Daycare	P*	Persons in care (max)	50
K-12	P		
Post-secondary	P		
Social Services	P		
Utilities:			
Minor	P*	Screening	
		Frontage screen	F-Screen 2
		Transition screen	T-Screen 2
Major	C3		
Solar Energy Facility	P*	In conjunction with:	Other allowed use
		Floor area (min)	0.1 FAR
		Relief	C3
Wireless Facility, Monopole	C2*	Supplemental standards	CASP Sec. 5.F.7.
Wireless Facility, Rooftop	P*	Supplemental standards	CASP Sec. 5.F.7.
Open Space & Recreation			
Indoor Recreation, Commercial	P		
Nature Reserve	P		
Open Space, Public	P		
Outdoor Recreation, Commercial:			
General	P		
Golf Course	--		
Key: P = Permitted Use -- = Not Permitted S = Special Use Program * = Use standard applies C1 = Approval by Zoning Administrator C2 = Public Hearing by Zoning Administrator C3 = Review by City Planning Commission			

Use	Permission	Use Standard	Specification
Recreation, Public	P		
Amphitheater or Stadium			
Local	P		
Regional	C3		
Transportation			
Airport	--		
Freight Terminal	--		
Heliport	C2*	Incidental to:	Residential Uses, Office or Medical
Railway Facility	--		
Transit Station	P		
General Commercial			
Animal Services:			
General	P*	Use enclosure	Fully Indoor
Kennel	--		
Veterinary Care	P*	Use enclosure	Fully indoor
Commissary Kitchen	P		
Eating & Drinking:			
Alcohol Service	C2*	Supplemental procedures	CASP Sec. 5.G.1.
		In conjunction with:	Restaurant
Bar	C2*	Supplemental procedures	CASP Sec. 5.G.1.
Key: P = Permitted Use S = Special Use Program -- = Not Permitted * = Use standard applies			
C1 = Approval by Zoning Administrator C2 = Public Hearing by Zoning Administrator C3 = Review by City Planning Commission			

Use	Permission	Use Standard	Specification
Counter Service	P		
Restaurant	P		
Entertainment Venue, Indoor:			
Local	P		
Regional	C2		
Financial Services:			
General	P		
Alternative	--		
Instructional Services	P		
Lodging	C2*	Supplemental standards	CASP Sec. 5.F.3.
Medical Clinic	P		
Office	P		
Personal Services:			
General	P		
Massage, Licensed	P		
Massage, Unlicensed	--		
Postmortem Services	C2		
Retail:			
General	P		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Alcohol	C2*	Supplemental procedures	CASP Sec. 5.G.4.
Farmers' Market, Certified	P*	Service hours	7AM/10PM
		Operating days per week (max)	5
		Special use program	Ch. 1A Sec. 5C.4.1.
Firearms	C2*	Supplemental procedures	CASP Sec. 5.G.5.
Food & Beverage	P		
Large Format	C3*	Supplemental procedures	CASP Sec. 5.G.6.
Pet Shop	P		
Merchant Market	P		
Temporary Outdoor	P		
Smoke & Vape Shop	--		
Sexually Oriented Business:			
General	P*	Use separation (min)	
		Other Sexually Oriented Business Use	1,000'
		Sensitive Use	500'
		Residential or Agricultural Use District	500'
Sexual Encounter	--		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Heavy Commercial

Motor Vehicle Services:

General	P*	Use separation (min)	
		Sensitive Use	200'
		Agricultural, Residential, or Residential Mixed Use District	200'
		Use enclosure	Fully indoors
		Screening	
		Frontage screen	F-Screen 3
		Transition screen	T-Screen 1
		Hours of operation (open/close)	7AM/7PM
		Service hours (open/close)	7AM/7PM
		Outdoor sound system	Prohibited
Supplemental standards		CASP Sec. 5.F.4.	
Relief		C2	
Car Wash	--		
Commercial Vehicle	--		
Fueling Station	C2		

Motor Vehicle Sales & Rental:

Commercial Vehicle	--		
Household Moving Truck Rental	--		
Standard Vehicle	P*	Screening	
		Frontage screen	F-Screen 3
		Transition screen	T-Screen 1

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Storage, Indoor:			
General	P		
Self-Service Facility	--		
Storage, Outdoor:			
General	--		
Cargo Container	--		
Commercial Vehicle	--		
Official Motor Vehicle Impound	--		
Standard Vehicle	--		
Light Industrial		Use standard applicability	
	Adjoining		Sensitive Use, Agricultural, Residential, Residential-Mixed Use, or Industrial-Mixed District
	Screening		
	Frontage Screen		F-Screen 4
	Transition Screen		T-Screen 1
	Use enclosure		Fully Indoor
Electronics Assembly	P*	(see Light Industrial)	
Maintenance & Repair Services	P*	(see Light Industrial)	
Manufacturing, Light:			
General	P*	(see Light Industrial)	
Alcoholic Beverage	P*	(see Light Industrial)	
<div>Key: P = Permitted Use S = Special Use Program C1 = Approval by Zoning Administrator -- = Not Permitted * = Use standard applies C2 = Public Hearing by Zoning Administrator </div>			

Use	Permission	Use Standard	Specification
Artistic & Artisanal	P*	(see Light Industrial)	
Cosmetic, Pharmaceutical	--	(see Light Industrial)	
Food & Drink	P*	(see Light Industrial)	
Garment & Accessory	P*	(see Light Industrial)	
Textile	--		
Research & Development	P*	(see Light Industrial)	
Soundstages & Backlots	P*	(see Light Industrial)	
Wholesale Trade & Warehousing	P*	(see Light Industrial)	
		Non-residential tenant size (max)	25,000 SF
		Relief	C2
Heavy Industrial			
Animal Products Processing	--		
Manufacturing, Heavy:			
General	--		
Chemical Products	--		
Petroleum & Coal Products	--		
Salvage Yard	--		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Recycling Facility:

Collection	C2*	In conjunction with:	Other allowed use
		Area (max)	600 SF
		Use separation	
		Agricultural or Residential Use District (min)	150'
		Use setback	
		Frontage lot line (min)	20'
		Common lot line (min)	10'
		Use enclosure	Covered and enclosed
		Hours of operation (early/late)	7AM/7PM
		Supplemental standards	CASP Sec. 5.F.5.
Donation Bin	P*	Supplemental procedures	CASP Sec. 5.G.2.
		In conjunction with:	Other allowed use
		Size	Height: 82" Depth: 50" Width: 60"
		Use separation	
		Agricultural or Residential Use District (min)	100'
		Use setback	
		Frontage lot line (min)	20'
		Common lot line (min)	10'
		Use enclosure	Covered and enclosed
		Supplemental standards	CASP Sec. 5.F.6.
Sorting & Processing	--	Supplemental procedures	CASP Sec. 5.G.3.

Key: P = Permitted Use
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S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Resource Extraction:			
General	--		
Exploratory Core Hole	--		
Off-Shore Drilling Servicing Installation	--		
Solid Waste Facility:			
Green Waste	--		
Hazardous Waste Facility	--		
Solid Waste	--		
Agricultural			
Animal Keeping:			
Bees	P*	Accessory to:	Dwelling
		Lot Area (min)	
		Per beehive	2,500 SF
		Location	
		Frontage yard	Prohibited
		Use Setback (min)	
		Side, rear, and alley lot lines	5'
		Screening	
		Transition screen	T-Screen 1
		Exception	Rooftop location
		Supplemental standards	CASP Sec. 5.F.1.
Dairy	--		
Equine, Commercial	--		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Equine, Non-commercial	--		
Livestock	--		
Pets	P*	In conjunction with:	Other allowed use
Small Animals	--		
Wild Animals	--		
Plant Cultivation:			
Community Garden	P		
Farming	P*	Use enclosure	Fully Indoor
Truck Gardening	P		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
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C3 = Review by City Planning Commission

D. Urban Center

1. Intent

Urban Center is an Industrial-Mixed Use District intended to accommodate a wide range of commercial uses, along with light industrial uses and office space, while also providing affordable and permanent supportive housing opportunities.

2. Allowed Uses & Use Limitations

Use	Permission	Use Standard	Specification
Residential	*	Use Separation (min)	
		Heavy Industrial	50'
		Relief	C1
Dwelling	P*	(see Residential)	
		In conjunction with:	General Commercial, Light Industrial Uses
		Floor area (min)	15% of total floor area, or 0.5 FAR, whichever is greater, up to a maximum of 1.0 FAR required
		Exception	100% Restricted affordable units
Household Business:			
Family Child Care	P*	In conjunction with:	Dwelling
Home Occupation	P*	In conjunction with:	Dwelling
		Hours of operation (early/late)	8AM/8PM
		Client visits per hour (max)	1
		Supplemental standards	CASP Sec. 5.F.2.
Home Sharing	P*	In conjunction with:	Dwelling
		Special use program	Ch. 1A Sec. 5C.4.4.
Joint Living & Work Quarters	--		
<div>Key: P = Permitted Use S = Special Use Program</div> <div>-- = Not Permitted * = Use standard applies</div> <div>C1 = Approval by Zoning Administrator</div> <div>C2 = Public Hearing by Zoning Administrator</div> <div>C3 = Review by City Planning Commission</div>			

Use	Permission	Use Standard	Specification
Live/Work	P*	(see Residential)	
		In conjunction with:	General Commercial, Light Industrial Uses
		Floor area (min)	15% of total floor area, or 0.5 FAR, whichever is greater, up to a maximum of 1.0 FAR required
		Exception	100% Restricted affordable housing
Mobilehome Park	--		
Supportive Housing:			
General	P*	(see Residential)	
Medical Care	--		
Transitional Shelter	P*	(see Residential)	
Public & Institutional			
Cemetery	--		
Civic Facility:			
Local	P		
Regional	C3		
Detention Facility	--		
Fleet Services	P		
Medical:			
Local	C2		
Regional	C3		
Office, Government	P		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Parking	P		
Public Safety Facility	P		
Religious Assembly	C2		
School:			
Preschool/Daycare	P		
K-12	P		
Post-secondary	P		
Social Services	P		
Utilities:			
Minor	P*	Screening	
		Frontage screen	F-Screen 2
		Transition screen	T-Screen 2
Major	C3		
Solar Energy Facility	P*	In conjunction with:	Other allowed use
		Floor area (min)	0.1 FAR
		Relief	C3
Wireless Facility, Monopole	C2*	Supplemental standards	CASP Sec. 5.F.7.
Wireless Facility, Rooftop	P*	Supplemental standards	CASP Sec. 5.F.7.
Open Space & Recreation			
Indoor Recreation, Commercial	P		
Nature Reserve	P		
Open Space, Public	P		

Key: P = Permitted Use
 -- = Not Permitted

 S = Special Use Program
 * = Use standard applies

C1 = Approval by Zoning Administrator
 C2 = Public Hearing by Zoning Administrator
 C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Outdoor Recreation, Commercial:			
General	P		
Golf Course	--		
Recreation, Public			
Amphitheater or Stadium			
Local	P		
Regional	C3		
Transportation			
Airport	--		
Freight Terminal	--		
Heliport	C2*	Incidental to:	Residential Uses, Office or Medical
Railway Facility	--		
Transit Station	P		
General Commercial			
Animal Services:			
General	P*	Use enclosure	Fully Indoor
Kennel	--		
Veterinary Care	P*	Use enclosure	Fully indoor
Commissary Kitchen	P		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
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Use	Permission	Use Standard	Specification
Retail:			
General	P		
Alcohol	C2*	Supplemental procedures	CASP Sec. 5.G.4.
Farmers' Market, Certified	C1*	Hours of operation (open/close)	7AM/9PM
		Service hours	6AM/10PM
		Operating days per week (max)	5
		Special use program	Ch. 1A Sec. 5C.4.1.
Firearms	C2*	Supplemental procedures	CASP Sec. 5.G.5.
Food & Beverage	P		
Large Format	C3*	Supplemental procedures	CASP Sec. 5.G.6.
Pet Shop	P		
Merchant Market	P		
Temporary Outdoor	P		
Smoke & Vape Shop	P	Use separation	
		Residential or Residential Mixed Use District	500'
		Hours of operation (open/close)	
		Within 500' of Residential or Residential Mixed Use District	7AM/10PM
		Relief	C2
Sexually Oriented Business:			
General	P*	Use separation (min)	
		Other Sexually Oriented Business Use	1,000'
		Sensitive Use	500'
		Residential or Agricultural Use District	500'
<div>Key: P = Permitted Use S = Special Use Program C1 = Approval by Zoning Administrator</div> <div> -- = Not Permitted * = Use standard applies C2 = Public Hearing by Zoning Administrator</div> <div> </div>			

Use	Permission	Use Standard	Specification
Sexual Encounter	--		
Heavy Commercial			
Motor Vehicle Services:			
General	P*	Use separation (min)	
		Sensitive Use	200'
		Agricultural, Residential, or Residential Mixed use District	200'
		Use enclosure	Fully indoors
		Screening	
		Frontage screen	F-Screen 3
		Transition screen	T-Screen 1
		Hours of operation (open/close)	7AM/7PM
		Service hours (open/close)	7AM/7PM
		Outdoor sound system	Prohibited
		Supplemental standards	CASP Sec. 5.F.4.
		Relief	C2
Car Wash	--		
Commercial Vehicle	--		
Fueling Station	C2		
Motor Vehicle Sales & Rental:			
Commercial Vehicle	--		
Household Moving Truck Rental	--		
Standard Vehicle	P*	Screening	
		Frontage screen	F-Screen 3
		Transition screen	T-Screen 1
Key:	P = Permitted Use -- = Not Permitted	S = Special Use Program * = Use standard applies	C1 = Approval by Zoning Administrator C2 = Public Hearing by Zoning Administrator C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Storage, Indoor:			
General	P		
Self-Service Facility	P*	In conjunction with:	Other allowed use
		Floor area (min)	0.1 FAR
		Use separation (min)	
		Other Self-Service Facility	500'
		Relief	C2
Storage, Outdoor:			
General	P*	Accessory to:	Other allowed use
		Screening	
		Outdoor storage screen	S-Screen 2
Cargo Container	--		
Commercial Vehicle	--		
Official Motor Vehicle Impound	--		
Standard Vehicle	P*	Accessory to:	General Motor Vehicle Services
Light Industrial		Use standard applicability	
		Adjoining	Sensitive Use, Agricultural, Residential, Residential Mixed, or Industrial-Mixed Use District
		Screening	
		Frontage Screen	F-Screen 4
		Transition Screen	T-Screen 1
		Use enclosure	Fully Indoor
	Electronics Assembly	P*	(see Light Industrial)
Maintenance & Repair Services	P*	(see Light Industrial)	
<div>Key: P = Permitted Use S = Special Use Program C1 = Approval by Zoning Administrator</div> <div> -- = Not Permitted * = Use standard applies C2 = Public Hearing by Zoning Administrator</div> <div> </div>			

Use	Permission	Use Standard	Specification
Manufacturing, Light:			
General	P*	(see Light Industrial)	
Alcoholic Beverage	P*	(see Light Industrial)	
Artistic & Artisanal	P*	(see Light Industrial)	
Cosmetic, Pharmaceutical	--	(see Light Industrial)	
Food & Drink	P*	(see Light Industrial)	
Garment & Accessory	P*	(see Light Industrial)	
Textile	--		
Research & Development	P*	(see Light Industrial)	
Soundstages & Backlots	P*	(see Light Industrial)	
Wholesale Trade & Warehousing	P*	(see Light Industrial)	
		Non-residential tenant size (max)	25,000 SF
		Relief	C2
Heavy Industrial			
Animal Products Processing	--		
Manufacturing, Heavy:			
General	--		
Chemical Products	--		
Petroleum & Coal Products	--		
Salvage Yard	--		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Recycling Facility:			
Collection	C2*		In conjunction with: Other allowed use
			Area (max) 600 SF
			Use separation
			Agricultural or Residential Use District (min) 150'
			Use setback
			Frontage lot line (min) 20'
			Common lot line (min) 10'
			Use enclosure Covered and enclosed
			Hours of operation (early/late) 7AM/7PM
			Supplemental standards CASP Sec. 5.F.5.
			Supplemental procedures CASP Sec. 5.G.2.
Donation Bin	P*		In conjunction with: Other allowed use
			Size Height: 82" Depth: 50" Width: 60"
			Use separation
			Agricultural or Residential Use District (min) 100'
			Use setback
			Frontage lot line (min) 20'
			Common lot line (min) 10'
			Use enclosure Covered and enclosed
			Supplemental standards CASP Sec. 5.F.6.
			Supplemental procedures CASP Sec. 5.G.3.
Sorting & Processing	--		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Resource Extraction:			
General	--		
Exploratory Core Hole	--		
Off-Shore Drilling Servicing Installation	--		
Solid Waste Facility:			
Green Waste	--		
Hazardous Waste Facility	--		
Solid Waste	--		
Agricultural			
Animal Keeping:			
Bees	P*	Accessory to:	Dwelling
		Lot Area (min)	
		Per beehive	2,500 SF
		Location	
		Frontage yard	Prohibited
		Use Setback (min)	
		Side, rear, and alley lot lines	5'
		Screening	
		Transition screen	T-Screen 1
		Exception	Rooftop location
		Supplemental standards	CASP Sec. 5.F.1.
Dairy	--		
Equine, Commercial	--		
Equine, Non-commercial	--		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Livestock	--		
Pets	P*	In conjunction with:	Other allowed use
Small Animals	--		
Wild Animals	--		
Plant Cultivation:			
Community Garden	P		
Farming	P*	Use enclosure	Fully Indoor
Truck Gardening	P		

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

E. Urban Innovation

1. Intent

Urban Innovation is an Industrial-Mixed Use District intended to promote light industrial uses and a wide variety of employment, cultural and recreational opportunities, while also providing affordable and permanent supportive housing opportunities.

2. Allowed Uses & Use Limitations

Use	Permission	Use Standard	Specification
Residential	*	Use Separation (min):	
		Heavy Industrial	50'
		Relief	C1
Dwelling	P*	(see Residential)	
		In conjunction with:	<div><div>– Office</div><div>– Light Industrial Uses</div></div>
		Floor area (min)	15% of total floor area, or 0.5 FAR, whichever is greater, up to a maximum of 1.0 FAR required
		Exception	100% Restricted affordable units
Household Business:			
Family Child Care	P*	In conjunction with:	Dwelling
Home Occupation	P*	In conjunction with:	Dwelling
		Hours of operation (early/late)	8AM/8PM
		Client visits per hour (max)	1
		Supplemental standards	CASP Sec. 5.F.2.
Home Sharing	P*	In conjunction with:	Dwelling
		Special use program	Ch. 1A Sec. 5C.4.4.

Key: P = Permitted Use
-- = Not Permitted

S = Special Use Program
* = Use standard applies

C1 = Approval by Zoning Administrator
C2 = Public Hearing by Zoning Administrator
C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Joint Living & Work Quarters	P*	(see Residential)	
		Designated work space:	
		Work space area (min/max)	10%/50%
		Workspace uses	<ul style="list-style-type: none"> - Office - Personal Services: General - Manufacturing, Light: General - Manufacturing, Light: Artistic & Artisanal
Live/Work	P*	(see Residential)	
		In conjunction with:	<ul style="list-style-type: none"> - Office - Light Industrial Uses
		Floor area (min)	15% of total floor area, or 0.5 FAR, whichever is greater, up to a maximum of 1.0 FAR required
		Exception	100% Restricted affordable housing
Mobilehome Park	--		
Supportive Housing:			
General	P*	(see Residential)	
Medical Care	--		
Transitional Shelter	P*	(see Residential)	
Public & Institutional			
Cemetery	--		
Civic Facility:			
Local	P		
Regional	C3		
Detention Facility	--		

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Use	Permission	Use Standard	Specification
Fleet Services	P		
Medical:			
Local	C2		
Regional	C3		
Office, Government	P		
Parking	P		
Public Safety Facility	P		
Religious Assembly	C2		
School:			
Preschool/Daycare	P		
K-12	P		
Post-secondary	P		
Social Services	P		
Utilities:			
Minor	P*	Screening:	
		Frontage screen	F-Screen 2
		Transition screen	T-Screen 2
Major	C3		
Solar Energy Facility	P*	In conjunction with:	Other allowed use
		Floor area (min)	0.1 FAR
		Relief	C3
Wireless Facility, Monopole	C2*	Supplemental standards	CASP Sec. 5.F.5.

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Use	Permission	Use Standard	Specification
Wireless Facility, Rooftop	P*	Supplemental standards	CASP Sec. 5.F.5.
Open Space & Recreation			
Indoor Recreation, Commercial	P		
Nature Reserve	P		
Open Space, Public	P		
Outdoor Recreation, Commercial:			
General	P		
Golf Course	--		
Recreation, Public	P		
Amphitheater or Stadium:			
Local	P		
Regional	C3		
Transportation			
Airport	--		
Freight Terminal	--		
Heliport	C2*	Incidental to:	Residential Uses, Office or Medical
Railway Facility	--		
Transit Station	P		

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Use	Permission	Use Standard	Specification
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General Commercial

Animal Services:

General	P*	Use enclosure	Fully Indoor
Kennel	--		
Veterinary Care	P*	Use enclosure	Fully indoor

Commissary Kitchen

P

Eating & Drinking:

Alcohol Service	C2*	In conjunction with:	Restaurant
		Supplemental procedures	CASP Sec. 5.G.1.
Bar	C2*	Supplemental procedures	CASP Sec. 5.G.1.
Counter Service	P		
Restaurant	P		

Entertainment Venue, Indoor:

Local	P		
Regional	P		

Financial Services:

General	P		
Alternative	--		

Instructional Services

P

Lodging

C2*

Supplemental standards
CASP Sec. 5.F.3.

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Use	Permission	Use Standard	Specification
Medical Clinic	P		
Office	P		
Personal Services:			
General	P		
Massage, Licensed	P		
Massage, Unlicensed	--		
Postmortem Services	C2		
Retail:			
General	P		
Alcohol	S*	Supplemental procedures	CASP Sec. 5.G.4.
Farmers' Market, Certified	C1*	Hours of operation (open/close)	7AM/9PM
		Service hours	6AM/10PM
		Operating days per week (max)	5
		Special use program	Ch. 1A Sec. 5C.4.1.
Firearms	C2*	Supplemental procedures	CASP Sec. 5.G.5.
Food & Beverage	P		
Large Format	C3*	Supplemental procedures	CASP Sec. 5.G.6.
Pet Shop	P		
Merchant Market	P		
Temporary Outdoor	P		

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Use	Permission	Use Standard	Specification
Smoke & Vape Shop	P	Use separation	
		Residential or Residential Mixed Use District	500'
		Hours of operation (open/close)	
		Within 500' of Residential or Residential Mixed Use District	7AM/10PM
		Relief	C2
Sexually Oriented Business:			
General	P*	Use separation (min)	
		Other Sexually Oriented Business Use	1,000'
		Sensitive Use	500'
		Residential or Agricultural Use District	500'
Sexual Encounter	--		
Heavy Commercial			
Motor Vehicle Services:			
General	P*	Use separation (min)	
		Sensitive Use	200'
		Agricultural, Residential or Residential Mixed Use District	200'
		Use enclosure	Fully indoors
		Screening	
		Frontage screen	F-Screen 3
		Transition screen	T-Screen 1
		Hours of operation (open/close)	7AM/7PM
		Service hours (open/close)	7AM/7PM
		Outdoor sound system	Prohibited
		Supplemental standards	CASP Sec. 5.F.4.
		Relief	C2
Key:	P = Permitted Use -- = Not Permitted	S = Special Use Program * = Use standard applies	C1 = Approval by Zoning Administrator C2 = Public Hearing by Zoning Administrator C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Car Wash	--		
Commercial Vehicle	--		
Fueling Station	C2		
Motor Vehicle Sales & Rental:			
Commercial Vehicle	--		
Household Moving Truck Rental	--		
Standard Vehicle	P*	Screening	
		Frontage screen	F-Screen 3
		Transition screen	T-Screen 1
Storage, Indoor:			
General	P		
Self-Service Facility	P*	In conjunction with:	Other allowed use
		Floor Area (min):	0.1 FAR
		Use separation (min)	
		Other Self-Service Facility	500'
		Relief	C2
Storage, Outdoor:			
General	--		
Cargo Container	--		
Commercial Vehicle	--		
Official Motor Vehicle Impound	--		
Standard Vehicle	P*	Accessory to:	General Motor Vehicle Services

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Use	Permission	Use Standard	Specification
Light Industrial		Use standard applicability:	
		Adjoining	Sensitive Use, Agricultural, Residential, Residential Mixed, or Industrial-Mixed Use District
		Screening:	
		Frontage Screen	F-Screen 4
		Transition Screen	T-Screen 1
		Use enclosure:	Fully Indoor
Electronics Assembly	P*	(see Light Industrial)	
Maintenance & Repair Services	P*	(see Light Industrial)	
Manufacturing, Light:			
General	P*	(see Light Industrial)	
Alcoholic Beverage	P*	(see Light Industrial)	
Artistic & Artisanal	P*	(see Light Industrial)	
Cosmetic, Pharmaceutical	--	(see Light Industrial)	
Food & Drink	P*	(see Light Industrial)	
Garment & Accessory	P*	(see Light Industrial)	
Textile	--		
Research & Development	P*	(see Light Industrial)	
Soundstages & Backlots	P*	(see Light Industrial)	
Wholesale Trade & Warehousing	P*	(see Light Industrial)	
		Non-residential tenant size (max)	25,000 SF
		Relief	C2
Key:	P = Permitted Use -- = Not Permitted	S = Special Use Program * = Use standard applies	C1 = Approval by Zoning Administrator C2 = Public Hearing by Zoning Administrator C3 = Review by City Planning Commission

Use	Permission	Use Standard	Specification
Heavy Industrial			
Animal Products Processing	--		
Manufacturing, Heavy:			
General	--		
Chemical Products	--		
Petroleum & Coal Products	--		
Salvage Yard	--		
Recycling Facility:			
Collection	C2*	In conjunction with:	Other allowed use
		Area (max)	600 SF
		Use separation	
		Agricultural or Residential Use District (min)	150'
		Use setback	
		Frontage lot line (min)	20'
		Common lot line (min)	10'
		Use enclosure	Covered and enclosed
		Hours of operation (early/late)	7AM/7PM
		Supplemental standards	CASP Sec. 5.F.5.
		Supplemental procedures	CASP Sec. 5.G.2.

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Use	Permission	Use Standard	Specification
Donation Bin	P*	In conjunction with:	Other allowed use
		Size	Height: 82" Depth: 50" Width: 60"
		Use separation	
		Agricultural or Residential Use District (min)	100'
		Use setback	
		Frontage lot line (min)	20'
		Common lot line (min)	10'
		Use enclosure	Covered and enclosed
		Supplemental standards	CASP Sec. 5.F.6.
		Supplemental procedures	CASP Sec. 5.G.3.
Sorting & Processing	--		
Resource Extraction:			
General	--		
Exploratory Core Hole	--		
Off-Shore Drilling Servicing Installation	--		
Solid Waste Facility:			
Green Waste	--		
Hazardous Waste Facility	--		
Solid Waste	--		

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Agricultural

Animal Keeping:

Bees	P*	Accessory to:	Dwelling
		Lot Area (min)	
		Per beehive	2,500 SF
		Location	
		Frontage yard	Prohibited
		Use Setback (min)	
		Side, rear, and alley lot lines	5'
		Screening	
		Transition screen	T-Screen 1
		Exception	Rooftop location
	Supplemental standards	CASP Sec. 5.F.1.	
Dairy	--		
Equine, Commercial	--		
Equine, Non-commercial	--		
Livestock	--		
Pets	P*	In conjunction with:	Other allowed use
Small Animals	--		
Wild Animals	--		

Plant Cultivation:

Community Garden	P		
Farming	P*	Use enclosure	Fully Indoor
Truck Gardening	P		

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F. Supplemental Standards

1. Animal Keeping, Bees

- a. Bee keeping operator shall be registered as a beekeeper with the Los Angeles County Agricultural Commission.
- b. A water source for bees shall be provided at all times on the lot where the bees are kept.

2. Home Occupation

On-site deliveries and shipments related to the commercial use in a home occupation shall not be performed by vehicles having a gross vehicular weight rating designation greater than Class 4 or greater than 16,000 pounds. Deliveries from larger trucks shall occur no more frequently than once every 2 months.

3. Lodging

A lodging use shall not be permitted where it requires a change of use from any residential use.

4. Motor Vehicle Services, General

- a. Bay doors and other building entrances and exits designed and intended for motor vehicle access shall meet the following standards:
 - i. Shall remain closed except during the allowed hours of operation, and
 - ii. Shall not face any frontage lot line.
- b. An off-street loading area, in compliance with development standard requirements for loading areas (LAMC Chapter 1A Sec. 4C.2.2.3.), shall be provided to adequately accommodate all loading, unloading and any other activities requiring the use of commercial vehicles for transportation.
- c. All client vehicles being serviced by a general motor vehicle service use shall be stored onsite.

5. Recycling Facilities, Collection

- a. All deposited goods and materials, temporary installations, debris, trash, and any other material associated with the use shall be placed or stored in a fully covered and enclosed recycling facility, and not be left or stored outdoors beyond the hours of operation.
- b. Collection facilities shall be emptied in accordance with their posted pick-up schedule, and the area surrounding the collection bins shall be maintained free of overflow goods and materials, litter, debris, posted bills, and graffiti at all times.
- c. In order to prevent unauthorized access to the collection facility, a tamper-resistant locking mechanism shall secure the opening of the collection facility.
- d. The receptacle, container, or bin in which goods and materials are stored shall be fabricated of durable, noncombustible, and waterproof materials.
- e. The recycling collection facility enclosure shall be clearly identified with the operator's name, address, and telephone number, the lot owner's name, address of the lot, the types of items or materials that may be deposited, the pick-up schedule, a notice that no material shall be left outside the enclosure, and instructions to call 311 to register any complaint regarding the facility with the Department of Building and Safety.

6. Recycling Facilities, Donation Bin

- a. No more than one collection bin shall be located on any lot.
- b. Collection bins shall be emptied in accordance with their posted pick-up schedule, and the area surrounding the collection bins shall be maintained free of overflow goods and materials, litter, debris, posted bills, and graffiti at all times.
- c. In order to prevent unauthorized access to the collection bin, a tamper-resistant locking mechanism shall secure the opening of the collection bin.
- d. The collection bin shall be fabricated of durable, noncombustible, and waterproof materials.
- e. Collection bins shall be illuminated between sunset and sunrise by a light source providing at least 1 footcandle of light.

- f. The collection bin shall be clearly identified with the operator's name, address, and telephone number, the lot owner's name, address of the lot, the types of items or materials that may be deposited, the pick-up schedule, a notice that no material shall be left outside the enclosure, and instructions to call 311 to register any complaint regarding the collection bin with the Department of Building and Safety.

7. Wireless Facility, All

The wireless facility shall meet all applicable standards required by LAMC Chapter 1A Sec. 4C.12.4. (Wireless Telecommunication Facilities).



G. Supplemental Procedures

1. Alcohol Service or Bar

- a. In addition to the notification otherwise required by Sec. 13B.2.2. (Class 2 Conditional Use Permit), the Zoning Administrator shall promptly notify the Council-member that represents the area including the project site of the conditional use application.
- b. In addition to the findings otherwise required by Sec. 13B.2.2. (Class 2 Conditional Use Permit), the Zoning Administrator shall also consider:
 - i. That the granting of the application will not result in an undue concentration of uses that dispense alcoholic beverages within a 1,000-foot radius of the lot according to the California Department of Alcoholic Beverage Control's guidelines for undue concentration.
 - ii. Consider the existing crime rate nearby, especially those crimes involving public drunkenness, the illegal sale or use of narcotics, drugs or alcohol, disturbing the peace, and disorderly conduct, and whether revocation or nuisance proceedings have been initiated for any similar use in the area.
 - iii. That the proposed use will not detrimentally affect nearby Residential Use Districts or sensitive uses.
- c. Permission for multiple approvals to allow alcohol service for three or more tenant spaces may be applied for under a single conditional use permit entitlement, subject to the following:
 - i. Tenant spaces are maintained under a single ownership within a unified complex comprising a combined floor area of 10,000 square feet or greater on the same site.
 - ii. The entitlement application for multiple conditional use permits shall be subject to processes and procedures required by Sec. 13B.2.2. (Class 2 Conditional Use Permit).

- iii. Project Review shall be completed for each individual tenant space resulting in approval for each individual tenant space prior to the establishment of the proposed use within the subject tenant space.
- iv. Applications shall detail the square footage of each tenant space, suite or unit number, hours of operation, and specific nature of proposed use for each tenant-operator space.
- v. Each individual tenant space shall be separately addressed with applicable site-specific conditions. Any change in tenant-operator shall be required to apply for Project review in order to evaluate the applicability of existing conditions and review any potential changes in site operations and conditions.

2. Recycling Facilities, Collection

An annual site inspection shall be conducted by LADBS, pursuant to Sec. 13B.10.3. (Annual Inspection Monitoring - Auto Dismantling Yards, Junk Yards, Scrap Metal or Recycling Materials Processing Yards, Recycling Collection Centers, Buyback Centers, Recycling Materials Sorting Facilities, and Cargo Container Storage Yards).

3. Recycling Facilities, Donation Bin

An annual site inspection shall be conducted by LADBS pursuant to Sec. 13B.10.3. (Annual Inspection Monitoring - Auto Dismantling Yards, Junk Yards, Scrap Metal or Recycling Materials Processing Yards, Recycling Collection Centers, Buyback Centers, Recycling Materials Sorting Facilities, and Cargo Container Storage Yards).

4. Retail, Alcohol

- a. In addition to the notification otherwise required by Sec. 13B.2.2. (Class 2 Conditional Use Permit), the Zoning Administrator shall promptly notify the council-member that represents the area including the project site of the conditional use application.
- b. In addition to the findings otherwise required by Sec. 13B.2.2. (Class 2 Conditional Use Permit), the Zoning Administrator shall also consider:
 - i. That the granting of the application will not result in an undue concentration of uses that dispense alcoholic beverages within a

1,000-foot radius of the lot according to the California Department of Alcoholic Beverage control's guidelines for undue concentration.

- ii. Consider the existing crime rate nearby, especially those crimes involving public drunkenness, the illegal sale or use of narcotics, drugs or alcohol, disturbing the peace, and disorderly conduct, and whether revocation or nuisance proceedings have been initiated for any similar use in the area.
- iii. That the proposed use will not detrimentally affect nearby Residential Use Districts or sensitive uses.

5. Retail, Firearms

- a. In addition to the findings otherwise required by Sec. 13B.2.2. (Class 2 Conditional Use Permit), the Zoning Administrator shall also consider:
 - i. Whether the proposed use will result in an over-concentration of this use in the area, and
 - ii. The number of firearms available for sale at the lot.

6. Retail, Large Format

- a. In addition to a Conditional Use Permit with approval by the City Planning Commission, pursuant to Sec. 13B.2.3. (Class 3 Conditional Use Permit), new large format retail uses are required to prepare an economic impact analysis report for submission to the Department of City Planning and the Economic & Workforce Development Department for review in conjunction with its application to the Department of City Planning. The Economic & Workforce Development Department shall complete its review of the report within 60 days after receipt of the report from the applicant. The report shall identify the following:
 - i. The economic impact on retail businesses within a 3-mile radius based on the potential to divert or expand the local or regional customer base. Data portraying the existing customer volume of the study area as well as the anticipated customer volume of the study area shall be included in the report.
 - ii. The destruction or demolition of any buildings, structures, facilities or site area containing any of the following uses: any Residential Use,

Civic Facility, School, Nature Reserve, Public Open Space, or Public Recreation.

- iii. Contribution to local retail market in terms of providing lower in cost or higher in quality goods and services than currently available to residents within a 3-mile radius. A survey of goods and services offered by retail uses within a 3-mile radius shall be included within the report.
 - iv. The number of permanent jobs displaced or created as a direct result of the project. Permanent jobs shall be categorized by employment sector within the report.
 - v. Fiscal impact on City tax revenue, either positive or negative.
 - vi. Viability of future reuse of the project site in the event the business vacates the premises based on factors such as building design, site layout, and lease terms requiring the lot to remain vacant for a significant amount of time.
 - vii. Reasonable expectation that employment solicitation by day laborers will occur at or around the lot.
 - viii. Measures to mitigate any materially adverse impacts identified within the report.
- b. If determined by the City Planning Commission, or the City Council on appeal, that based on the findings of the report, or any other information received before or at a public hearing that there is a reasonable expectation that employment solicitation by day laborers will occur at or around the lot then the following measures may be required to the satisfaction of the City Planning Commission, or the City Council on appeal:
- i. The project shall accommodate employment solicitation by day laborers with dedicated congregation space that meets the following criteria:
 - a. Is sufficient in size based on reasonably expected users;
 - b. Located along but clear of a pedestrian accessway leading to a primary entrance; and
 - c. Is covered to provide adequate shelter from the weather.

- ii. Amenities including publicly accessible sources of drinking water, toilet and trash facilities, tables, and seating areas shall also be made available during business hours of operation.
- iii. A signage plan, indicating the location of signs at appropriate locations throughout the lot directing users to dedicated congregation areas and amenities.



Chapter 6

Density

This Chapter establishes the maximum density of household dwelling units and efficiency dwelling units permitted on a lot.

Properties designated with the FA Density District, an abbreviation for “Floor Area”, are limited only by floor area. Properties designated with the N Density District, an abbreviation for “Not Permitted”, do not allow dwelling units.

A. Density Applicability

1. General

All Projects filed after the effective date of this Specific Plan shall comply with the Density District standards as further specified below.

2. Applicability

Refer to Section 6A.2.2. (*Density Applicability*) of Chapter 1A of the LAMC for the Density Rule Category that applies to a Project based on the types of Project Activities involved.

B. Density Districts

1. Density Districts Map

The Density District for each property within the Specific Plan is set forth in **Map 6-1 (Density Districts Map)**.

2. Density Districts Table

The regulations for each Density District are provided for in Section 6B.1.2. (*Lot-Area Based Density Districts*) of Chapter 1A (Zoning Code) of the LAMC.





Density Districts Map 6-1

- FA
- N
- FWY



Chapter 7

Community Benefits Program

This Chapter establishes a Community Benefits Program pursuant to Div. 9.3. (*Community Benefits Program*) of Chapter 1A of the LAMC. This Community Benefits Program is comprised of a Local Affordable Housing Incentive Program, in Section B below, followed by a Public Benefits Incentive Program, in Section C below.



A. Community Benefits Standards

1. Relief

Requirements of this Chapter shall not be eligible for a Project Adjustment pursuant to Sec. 13B.4.4. (*Project Adjustment*) of Chapter 1A (Zoning Code) of the LAMC or a Project Exemption pursuant to Sec.13B.4.5. (*Project Exemption*) of Chapter 1A (Zoning Code) of the LAMC.

2. Pro Rata Share

Projects may seek less than the full increment of FAR available through the Public Benefits Incentive Programs in this Chapter provided that they provide a proportional share of community benefits and meet the minimum requirements.

3. Relationship to Other Regulations

- a. Citywide Density Bonus and Qualified Permanent Supportive Housing. Nothing in this Specific Plan is intended to override or conflict with the regulations set forth in Section 9.2.1. (*Density Bonus*) or 9.4.1. (*Permanent Supportive Housing Incentive Program*) of Chapter 1A (Zoning Code) of the LAMC that provide bonuses, waivers, and incentives for certain affordable housing projects. Projects may utilize bonuses, waivers, and incentives for certain affordable housing projects pursuant to Section 9.2.1. or 9.4.1. of Chapter 1A, applied to the Base FAR or other applicable base development rights for that zone. Projects that obtain density, height, or FAR bonuses, incentives, waivers, or concessions pursuant to Section 9.2.1. or 9.4.1. of Chapter 1A, or any other State or local program, including Government Code Sections 65915-65918, may not use the incentives set forth in this Chapter.
- b. Transit Oriented Communities Affordable Housing Incentive Program. For Housing Development Projects within the boundaries of this Specific Plan, the Citywide Transit Oriented Communities Guidelines shall be superseded by the provisions and requirements contained within this Chapter.

B. Local Affordable Housing Incentive Program Pursuant to Sec. 9.3.2. of Chapter 1A (Zoning Code) of the LAMC

1. Bonus Floor Area

A Housing Development that meets the requirements below may obtain an FAR of 4.5 in lieu of the subject site's base Maximum FAR.

2. Requirements

- a. **On-Site Restricted Affordable Units.** Within the boundaries of the CASP, a Housing Development shall provide Restricted Affordable Units at rates outlined in Set A of Sec. 9.3.2.B. (*Eligibility*) of Chapter 1A (Zoning Code) of the LAMC. The minimum number of Restricted Affordable Units shall be calculated based upon the total number of units in the final project.

Local Incentive Program Affordability Requirements - Set A (For Reference Only)

Acutely Low Income	Extremely Low Income	Very Low Income	Lower Income	Moderate
--	11%	15%	25%	n/a

As an alternative to providing Restricted Affordable Units at the rates outlined in Set A, a Housing Development may set aside 10% of units for Acutely Low Income Households.

- b. **Dwelling Unit Mix and Location.** A minimum of 20% of the total dwelling units for an eligible Housing Development that is Mixed-Income Housing shall be two bedrooms or greater.

3. Additional Incentives

In addition to the FAR bonus identified in Sec. B.1. of this Chapter, a Housing Development Project shall be granted two additional incentives and a 100 Percent Affordable Housing Project shall be granted three additional incentives. This shall supersede Sec. 9.3.2.D. (*Additional Incentives*) of Chapter 1A (Zoning Code) of the LAMC.

- a. **Building Width.** See Sec. 2.C.6. (*Building Width*) of Chapter 1A (Zoning Code) of the LAMC.
 - i. For all eligible Housing Development Projects, up to a 20% increase in maximum building width may be granted.
- b. **Lot Coverage.** See Sec. 2.C.2. (*Coverage*) of Chapter 1A (Zoning Code) of the LAMC.
 - i. For all eligible Housing Development Projects, up to a 20% increase in maximum lot coverage may be granted.
- c. **Lot Width.** See Sec. 2.C.1. (*Lot Size*) of Chapter 1A (Zoning Code) of the LAMC.
 - i. For all eligible Housing Development Projects, up to a 20% decrease in required minimum lot width may be granted.
- d. **Averaging of Floor Area.** See Sec. 2.C.4. (*Floor Area Ratio & Height*) of Chapter 1A (Zoning Code) of the LAMC.
 - i. A Housing Development Project that is located on two or more adjacent parcels may average the Floor Area over the project site provided that:
 - a. The proposed use is permitted by the Use District of each parcel; and
 - b. No further lot line adjustment or any other action that may cause the Housing Development Project site to be subdivided subsequent to this grant is permitted.

C. Public Benefits Incentive Programs Pursuant to Sec. 9.3. of Chapter 1A (Zoning Code) of the LAMC

To promote the production of improvements, facilities, resources, and services beyond affordable housing for the benefit and enjoyment of the general public.

1. Eligibility

A project must meet the criteria set forth in Sec. 9.3.1.C. (*Eligibility*) of Chapter 1A (Zoning Code) of the LAMC to be eligible for the following Public Benefits Incentive Programs.

A Housing Development Project must first use the Local Affordable Housing Incentive Program established in Section B of this Chapter to its fullest extent before being eligible for Public Benefits Incentive Programs. Projects which do not involve the construction of a Housing Development Project are eligible to use any of the following Public Benefits Incentive Programs.

2. Privately Owned Public Space pursuant to Sec. 9.3.3. of Chapter 1A (Zoning Code) of the LAMC

- a. For every additional four percent of buildable lot area dedicated as publicly accessible outdoor amenity space, above the subject site's required Lot Amenity Space, eligible projects may obtain an additional 1.0:1 FAR, up to the maximum Bonus FAR, for either of the following:
 - i. Land dedicated for public open space, in consultation with the Department of Recreation and Parks.
 - ii. On-site publicly accessible open space, constructed in accordance with the requirements listed below:
 - a. At least one public restroom and drinking water fountain shall be provided within, adjacent to, and/or and directly accessible from the publicly accessible open space. Public restrooms shall be made available during the operational hours of the publicly

accessible open space, and shall not necessitate the need to enter secured or otherwise publicly inaccessible portions of a building or site. Signage viewable from within the publicly accessible open space shall indicate that the restroom and drinking water fountain is available for public use.

- b. At least one of the amenity options listed below, which shall occupy a minimum of 400 square feet with no horizontal dimension less than 15 feet, shall be provided within or adjacent to the publicly accessible open space:
 - i. Outdoor exercise equipment available for public use
 - ii. Sport courts available for public use
 - iii. Dog run available for public use
 - iv. Children's play area available for public use
 - v. Community garden available for public use
 - vi. Public art or historical interpretive element
 - vii. Alternative Open Space Amenities deemed appropriate by the Director of Planning and approved under a Director's Determination
- c. At least 20% of the publicly accessible open space shall be shaded. Percentage shading shall be the shadow cast on the publicly accessible open space measured at noon (12:00 p.m.) on the summer solstice.
- d. A minimum of three public charging stations for personal electronic devices, with features like power outlets and USB connections, shall be provided at no cost to users.

3. Community Facilities pursuant to Sec. 9.3.4. of Chapter 1A (Zoning Code) of the LAMC

- a. Sites seeking to utilize the Community Facilities incentive must dedicate a minimum of 5,000 square feet to one of the eligible uses below. In addition to the minimum required space, for every 10% of bonus buildable floor area dedicated to one of the following, eligible projects may obtain an additional 1.0:1 FAR, up to the maximum Bonus FAR:
 - i. Daycare Facility pursuant to LAMC Chapter 1A Sec. 9.3.4.C.1.
 - ii. Full-Service Grocery Store pursuant to LAMC Chapter 1A Sec. 9.3.4.C.2.
 - iii. Health Center pursuant to LAMC Chapter 1A Sec. 9.3.4.C.3.
 - iv. School and Library pursuant to LAMC Chapter 1A Sec. 9.3.4.C.5.
 - v. Social Services pursuant to LAMC Chapter 1A Sec. 9.3.4.C.6.
 - a. Alternative Social Services shall require the approval of a Director's Determination.
 - vi. Civic Facility pursuant to LAMC Chapter 1A Sec. 9.3.4.C.7.
 - a. Alternative Civic Facilities shall require the approval of a Director's Determination.
 - vii. Legacy Small Business Area
 - a. The property owner shall devote floor area with below-market rent for a Legacy Small Business, as defined in Sec. 1.A.4. (Definitions) of this Specific Plan. Market rent shall be determined by a licensed appraiser.
 - b. Floor area used by a Legacy Small Business shall be used for such purpose for a minimum of 55 years after the Certificate of Occupancy is issued. For the purposes of this provision, the time in which the Legacy Small Business space is vacant does not count towards the required minimum.

- c. A minimum 10-year lease with a Legacy Small Business, with a 5 year renewal option, shall be required prior to the issuance of a Certificate of Occupancy. This requirement does not mean that the Legacy Small Business is required to complete the term of the lease. If the lease is not completed prior to the 10-year term, the property owner or their representatives shall find a new Legacy Small Business to complete the 10-year term. For the purposes of this provision, the time in which the Legacy Small Business space is vacant does not count towards the required minimum.
- d. The floor area devoted to a Legacy Small Business shall be located on-site.
- e. More than one Legacy Small Business may be permitted on a site pursuant to this incentive.
- f. For a project which is obtaining additional floor area for providing a Legacy Small Business, no other Certificate of Occupancy for the project shall be issued prior to a Certificate of Occupancy for the Legacy Small Business required pursuant to this Section.
- g. Prior to the issuance of a building permit, the owner of the lot or lots shall execute and record a covenant and agreement, acknowledging that the owner shall implement each of the applicable requirements set forth in this Community Facilities incentive. The covenant and agreement shall run with the land and be binding upon the owners, and any assignees, lessees, heirs, and successors of the owners. The City's right to enforce the covenant and agreement is in addition to any other remedy provided by law.

4. Additional On-Site Restricted Affordable Units

- a. A Housing Development may exceed the bonus FAR received through the Local Affordable Housing Incentive Program (Section 2 of this Chapter) up to the maximum Bonus FAR by an additional 1.0:1 FAR for each increase in the amount of on-site Restricted Affordable Units, calculated on the total number of units, according to the following percentages: 3% Deeply Low, Extremely Low Income, or Very Low Income; or 4% Low Income.

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Chapter 8

Streets

A. Street Dedication and Improvement

1. Requirement

Projects in the Specific Plan shall comply with the applicable dedication and improvement requirements of Div. 10.1. (*Street Dedication and Improvement*) of Chapter 1A (Zoning Code) of the LAMC. For the purposes of this Division, any lot in an Urban Village, Urban Center, Urban Innovation, or Public Use (P2) Use District shall be deemed equivalent to a lot in an Industrial-Mixed Use District.

- a. Pursuant to Div. 10.1.I. of Chapter 1A (Zoning Code) of the LAMC, where the existing improved roadway meets or exceeds the street standard, but the abutting sidewalk dimension is less than standard as depicted in the most recent version of the Bureau of Engineering's standard plan number S470, the sidewalk must be widened to meet the standard.

2. Street Standards

The street designations and street standards of rights-of-way within the Specific Plan boundaries can be found in Appendix A (Street Cross-Sections) and the Bureau of Engineering Navigate LA website.

B. Basic Streetscape Improvements

1. Applicability

When a right-of-way improvement is required of any Project pursuant to Section 8.A. of this Specific Plan, the following Basic Streetscape Improvements are also required as part of the right-of-way improvement.

2. Waiver of Improvements

The Director of Planning may waive, reduce, or modify the requirements of the Basic Streetscape Improvements pursuant to the waiver of dedication and improvement provisions set forth in Sec. 10.1.10. (*Waiver and Appeals*) of Chapter 1A (Zoning Code) of the LAMC.

3. Street Trees

- a. **Requirement.** The Project shall include the installation of street trees planted in parkways along the right of way adjacent to the Project, in coordination with the Bureau of Engineering and as approved by the Bureau of Street Services, Urban Forestry Division.
- b. **Number, Size, and Location of Street Trees.** The Project shall provide the maximum number of street trees, as determined by the Bureau of Street Services, Urban Forestry Division. Trees shall be planted in parkways; or if not in parkways, in the largest possible size tree wells meeting the requirements of the Bureau of Street Services, Urban Forestry Division.
- c. **Tree Removal and Replacement.** Where existing street trees must be removed and/or replaced as a result of required street widening or other improvements, approval from the Board of Public Works through the Bureau of Street Services, Urban Forestry Division, may be necessary.

4. Additional Basic Streetscape Improvements

- a. **Requirement for Projects.** A Project that includes fewer than 50 dwelling units or guest rooms shall provide at least one of the Additional Basic Streetscape Improvements listed in Table 8-1. For every additional 100 dwelling units or guest rooms, a Project shall provide an additional improvement listed in Table 8-1, not to exceed four Additional Basic Streetscape Improvements. A Project that does not include dwelling units or guest rooms shall include one Additional Basic Streetscape Improvement per 50,000 square feet of nonresidential floor area.



Table 8-1. Basic Streetscape Improvements

Typical Characteristics	Required Review	Standard Plan or Agency Review	Typical Maintenance
Parkways			
<ul style="list-style-type: none"> Standard dimension: 5' wide Surface treatment: low-growing drought-tolerant plants with mulch Convenience Strip: Unobstructed area 18" from back of curb, excluding a minimum 6"-wide curb. Required at planted parkways adjacent to curbside parking spaces or loading areas. Natural concrete (standard gray) or permeable pavers if approved by BOE. House Walk: If parkway is adjacent to marked on-street parking or loading spaces, a 5'-wide walkable surface across the parkway shall be provided every 35 to 50 feet. Walkable surface should be concrete (or permeable pavers if approved by BOE). 	BOE, BSS	BOE, BSS	Repair house walks when damaged; weed and clean as needed by owner
Special Sidewalk Paving			
<ul style="list-style-type: none"> Preferred: Concrete to be standard gray color, with approved permeable interlocking concrete pavers between tree wells (standard gray color). Type and pattern of permeable pavers to be approved by BOE. Approved pavers are listed on the "Approved Products" page at https://boe.lacity.org/apm/menu.cfm 	BOE	Non-Standard	Repair when damaged; clean as needed by owner

Table 8-1. Basic Streetscape Improvements

Typical Characteristics	Required Review	Standard Plan or Agency Review	Typical Maintenance
Special Lighting			
<ul style="list-style-type: none"> – Special lighting that adds to the Area’s sense of place is encouraged within the public right-of-way, provided that it does not interfere with pedestrian movement, vehicular safety, the approved street light/street tree spacing pattern, or other required streetscape elements – Examples of special lighting include accent lighting of landscape and architectural features – Special lighting may be installed with a revocable permit. The infrastructure for this lighting shall be maintained by the permit holder and not the Bureau of Street Lighting. 	BSS	Non-Standard	Repair when damaged
Bicycle Racks			
<ul style="list-style-type: none"> – Place at a location approved by the DOT and city engineer. A minimum 48" wide unobstructed sidewalk access must be maintained. – Inverted U or approved equal 	DOT, BOE	S-671	Per review agency
Potted Planters			
<ul style="list-style-type: none"> – Shrub heights to be approved by BSS – Include water trays or internal water system – Not to exceed dimensions (width/depth) of tree wells per this plan – Must be designed and installed against any overturning force 	BSS	Non-Standard	Weed; remove/replace dead, dying or diseased plants; prune; remove litter; fertilize periodically
Bus Shelters			
<ul style="list-style-type: none"> – Provided at the discretion of the City Coordinated Street Furniture Program vendor at major bus stops 	BSS, BOE	BSS, BOE	By City vendor

Table 8-1. Basic Streetscape Improvements

Typical Characteristics	Required Review	Standard Plan or Agency Review	Typical Maintenance
Bus Benches & Trash Receptacles			
– Provided at the discretion of the City Coordinated Street Furniture Program vendor at major bus stops	BSS, BOE	BSS, BOE	By City vendor
Bus Stop Lights			
– Install in pairs within 20' of bus stops	BSL, DWP	BSL, DWP	By BSL
– 14' or 12' AV Steel Pole (galvanized steel) or approved equal			
Crosswalk Striping			
– Per LADOT policy, the implementation of continental striping on existing marked crosswalks shall be prioritized on major streets and at intersection crossings	DOT, BOE	S-480, S-481.1	Reapply every 5–10 years
Crosswalk ADA Ramps			
– ADA-approved ramps with detectable warning surface (min. 3' x 4')	BOE	S-442	Repair when damaged; clean as needed
– Two ramps per corner at intersections (as feasible) and one ramp at each end of mid-block crossings			
– Detectable warning surface in yellow; remainder of ramp to be natural concrete (standard gray)			
Major Streetscape Improvements Listed in Table 8-2			
– See Table 8-2			

- b. **Proposed Paseo.** In addition to the requirement(s) set forth above, a Project shall include a passageway for pedestrians at the location(s) where a Proposed Paseo has been identified in the Subarea Street Map. The passageway shall meet the following requirements:
- i. Minimum width of 10 feet that is uncovered and open to the sky.
 - ii. Shall be physically separated from and uninterrupted by motor vehicle use areas except where required to cross a drive aisle. Physical separation methods may include curbs of no less than 4 inches in height or bollards, walls, raised planters or similar containment methods, no less than 30 inches in height and separated by no more than 5 feet.
 - iii. The surface of the passageway shall be illuminated in accordance with Sec. 4C.10.1.C.3. (Pedestrian-Oriented Lighting) of Chapter 1A (Zoning Code) of the LAMC.
 - iv. Shall be made permanently available to the general public, at no cost, between sunrise and sunset daily, or during the operating hours of the building, whichever would result in a longer period of time. No gates or other barriers may block any portion of a pedestrian passageway from pedestrian access during the required available hours, and a sign shall be posted at every public entrance to the pedestrian passageway in accordance with the standards in Sec. 2C.3.3.D.10.b.ii. of Chapter 1A (Zoning Code) of the LAMC.
 - v. Each facade facing the passageway shall meet the side street transparency and entrance standards of the applied Frontage District (Chapter 3).

C. Major Streetscape Improvements

1. Intent

The Major Streetscape Improvements list in Table 8-2, and as shown on the Subarea Street Maps, serves as policy guidance to inform and support future street improvements and investments within the boundaries of the Specific Plan, and are intended to be implemented over time through a variety of means, including:

- a. By City agencies in conjunction with street improvement projects, Metro Call for Projects funding or other grants;
- b. By Certified Neighborhood Councils, Business Improvement District(s) or other community organizations; and
- c. By private property owners, developers, and business owners, in conjunction with development projects or as voluntary improvements.

2. Major Streetscape Improvements List

Table 8-2. Major Streetscape Improvements

Typical Characteristics	Required Review	Standard Plan or Agency Review	Typical Maintenance
New Crosswalks			
<ul style="list-style-type: none"> Per LADOT policy, the implementation of continental striping on new marked crosswalks shall be prioritized on major streets and at intersection crossings Where the nearest existing pedestrian crossings are spaced more than 600 feet apart, crosswalks should be provided, either at uncontrolled intersections or mid-block, as determined by LADOT At new uncontrolled, marked crosswalks a new signal (e.g., Rectangular Rapid Flash Beacon, Advanced Pedestrian Warning Device) should be considered, which would require a warrant analysis by the LADOT District Office Pedestrian refuge islands should be considered for all midblock crossings or intersection locations where there is a center turn lane and where a turn pocket is not necessary The type and design of specific pedestrian signals, and refuge islands would be studied and determined by LADOT BSL to review new crosswalks to ensure adequate illumination and lighting level 	DOT, BOE, BSL	S-480, S-481	Reapply every 5–10 years
New Traffic Signals			
<ul style="list-style-type: none"> Refer to Proposed Traffic Signals locations indicated on the Subarea Street Maps Any new traffic signal shall be planned and installed in conjunction with the LADOT District Office, including signal warrant analysis 	DOT, BOE	DOT, BOE	By DOT

Table 8-2. Major Streetscape Improvements

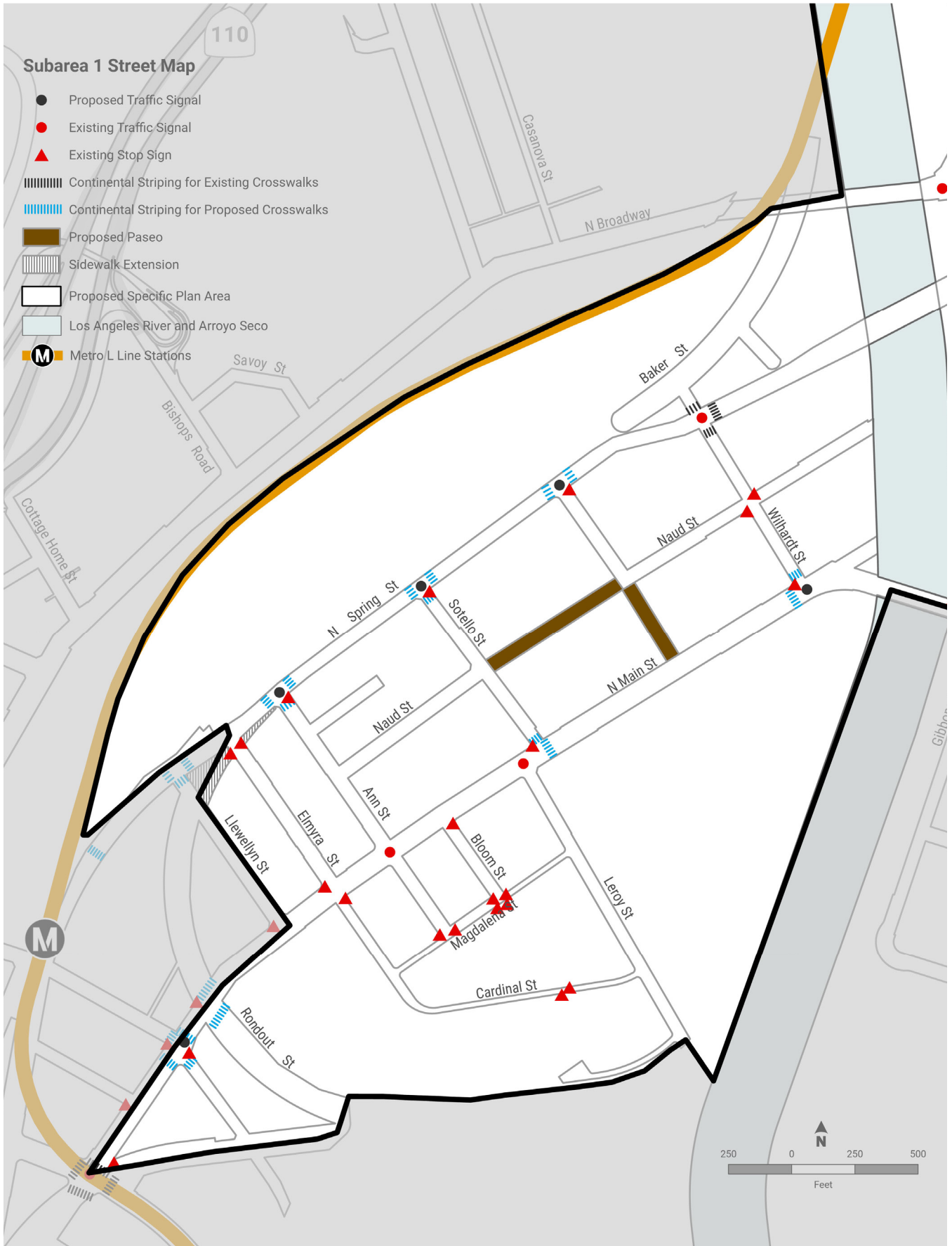
Typical Characteristics	Required Review	Standard Plan or Agency Review	Typical Maintenance
Curb Extensions			
<ul style="list-style-type: none"> – Located at intersections or midblock, where feasible subject to LADOT approval – Extending to width of parking lane – Natural concrete paving (standard gray) – Planting and trees optional; incorporate per BSS and LADOT guidelines; max 36" high – Refer to Green Street Standard Plans for Vegetated Stormwater Curb Extensions (S-484-0) – Minimum curb return radius of 25' for street cleaning purposes. If less than 25', to be maintained by R-permit holder. – Provide traffic warning sign at the curb extensions to prevent drivers from driving into the curb extension 	BOE, DOT, BSS	S-484	Per review agency
Parking Lane Planters			
<ul style="list-style-type: none"> – Located within existing parking lanes – Minimum size: 4' x 6' (not to exceed width of parking lane) – Install street trees (Lavender Trumpet Tree) within planters – Surface treatment: low growing plants (max 36" high) – Observe LADOT guidelines to maintain visibility for vehicles – Protection from errant drivers provided by raised curbs, bollards, railings, or other fixed objects per LADOT standards 	BOE, DOT, BSS	Non-Standard	Weed; remove/replace dead, dying or diseased plants; prune; remove litter; fertilize periodically; prune trees for clearance (permit required); maintain gutter between planter and sidewalk

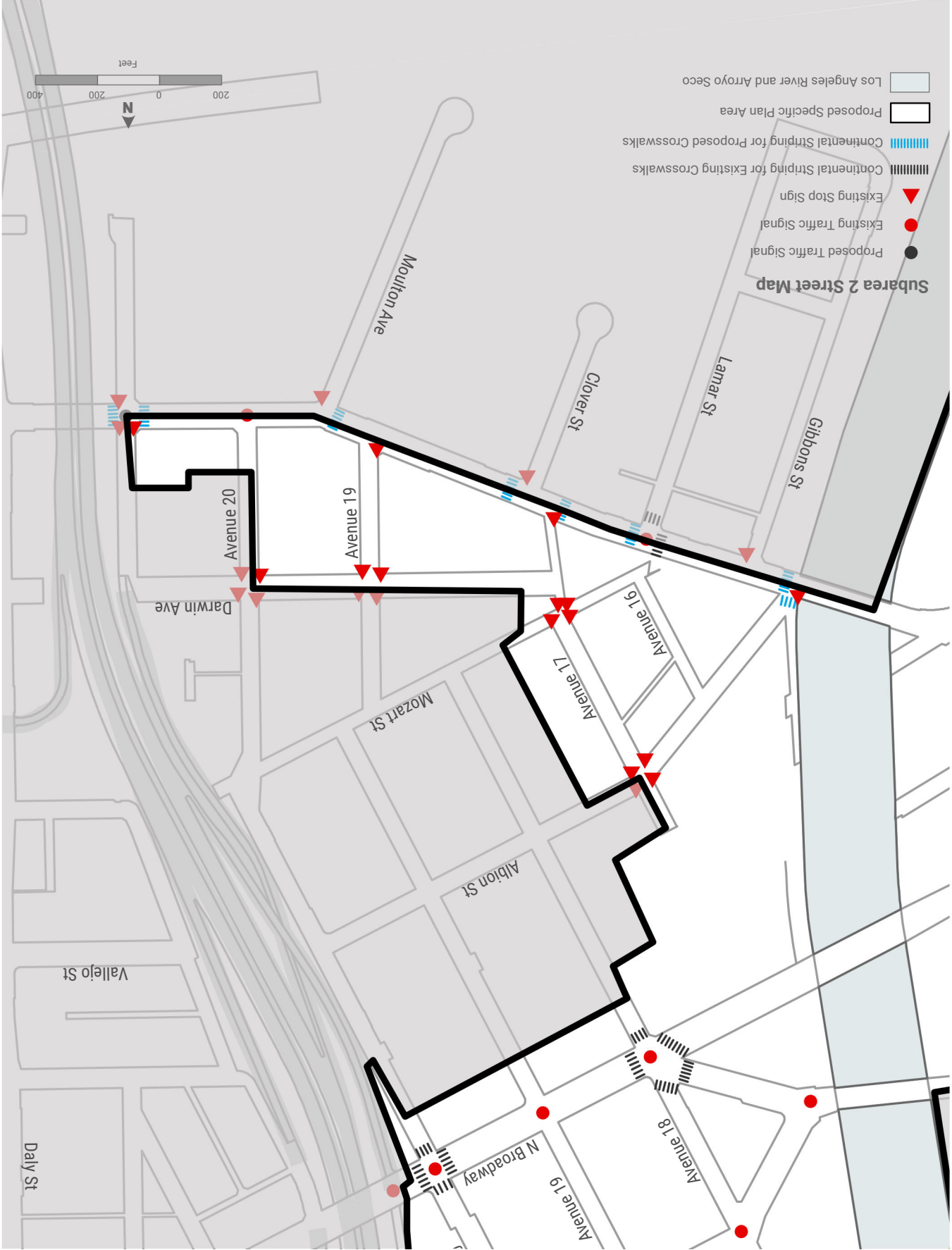
Table 8-2. Major Streetscape Improvements

Typical Characteristics	Required Review	Standard Plan or Agency Review	Typical Maintenance
Raised Landscaped Medians			
<ul style="list-style-type: none"> – A landscaped median shall be installed along Spring Street between College and Baker Streets. The median improvements shall be interrupted to accommodate left-turn pockets at Ann Street, Sotello and Mesnager Streets. – The landscaped median shall be approximately 10 feet in width and shall be planted with mature, drought-tolerant, shade canopy trees and low-maintenance, drought-tolerant ground cover and shrubs – Minimum 6" high integral curb and gutter per City Standard Plan – Natural concrete (standard gray) – Slope to center to collect runoff; infiltration or treatment of street runoff where feasible 	BOE, DOT, BSS	BOE, DOT, BSS	Weed; remove/replace dead, dying or diseased plants; prune; remove litter; fertilize periodically; prune trees for clearance (permit required); mulch and irrigate
Bioswales			
<ul style="list-style-type: none"> – Plant low-growing plants not to exceed 36" in height (measured from pavement) – Refer to Green Street Standard Plan for list of permitted planting materials 	BOE, BSS, BOS	S-480, S-483	Weed; remove/replace dead, dying or diseased plants; prune; remove litter; fertilize periodically; prune trees for clearance (permit required)
Seating and Benches			
<ul style="list-style-type: none"> – 118" wide with a middle arm rest – Place at mid-block or a minimum of every 300' – Distinct from benches provided as part of City Coordinated Street Furniture Program 	BOE, BSS	Non-Standard	Remove graffiti; clean

Table 8-2. Major Streetscape Improvements

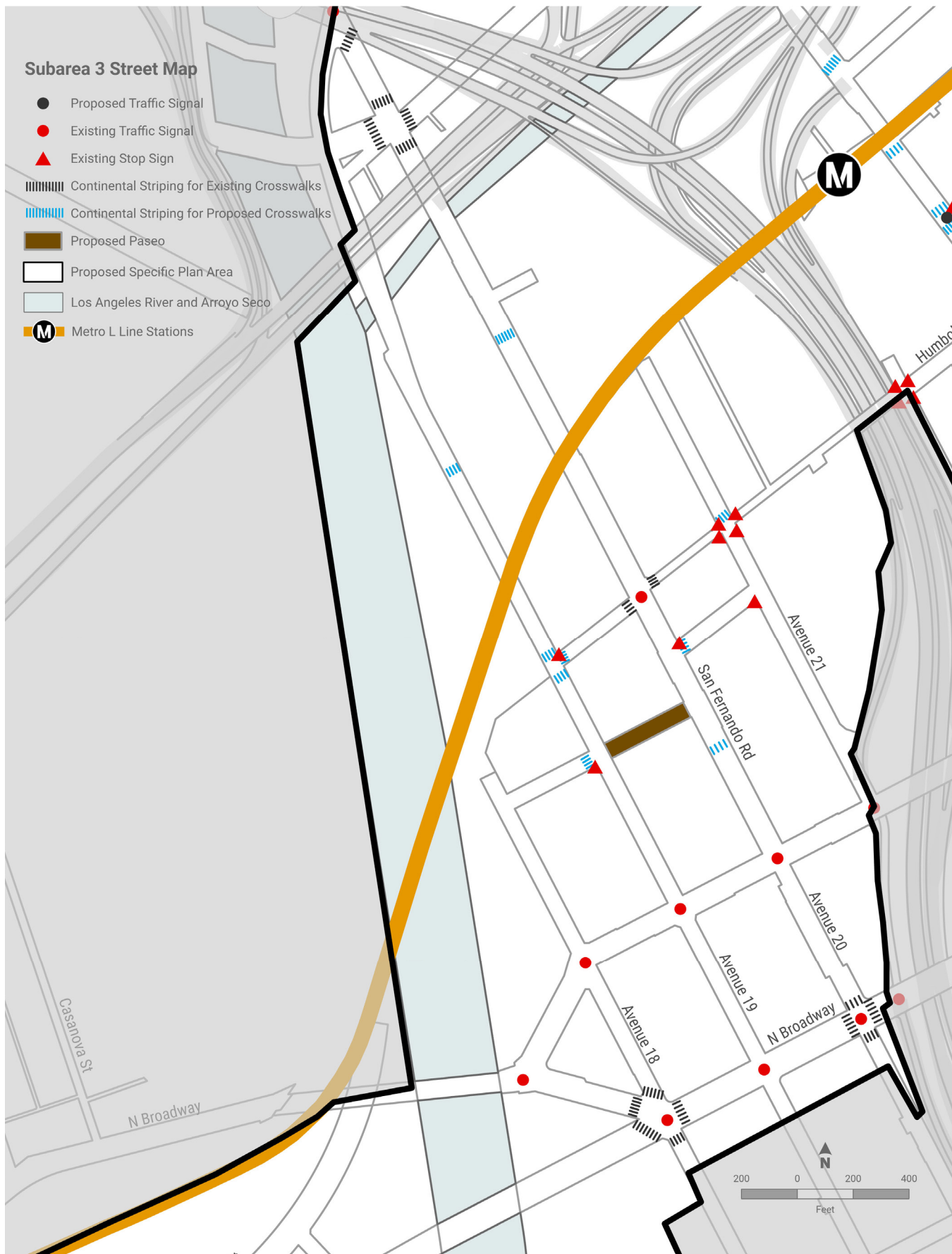
Typical Characteristics	Required Review	Standard Plan or Agency Review	Typical Maintenance
Trash Receptacles			
<ul style="list-style-type: none"> At corners of major intersections, and adjacent to benches. Distinct from trash receptacles provided as part of City Coordinated Street Furniture Program. 	BSS	Non-Standard	Empty as needed; remove graffiti; clean
Bicycle Infrastructure			
<ul style="list-style-type: none"> All Bicycle Friendly Streets identified in the 2010 Bicycle Plan shall be improved to include Bicycle Friendly Street improvements as described in the 2010 Bicycle Plan and highlighted in the 2010 Bicycle Plan's Technical Design Handbook. Bicycle lanes shall be included on N. Spring, N. Main, Pasadena Avenue, San Fernando Boulevard, Figueroa Street, and a portion of Avenue 26 as illustrated on the cross-section standard plans on Navigate LA, the Bicycle Network Map, and Appendix 1. Bicycle sharrow markings shall be included on Avenue 26 between the Arroyo Seco (Pasadena) Freeway and the Gold Line Bridge if severe roadway width constraints (i.e. the existence of freeway on and off-ramps) prohibit the addition of bicycle lanes at this location. A bicycle lane shall be installed on Avenue 20 between Broadway and Main Street as illustrated in the cross-section standard plans on Navigate LA, the Bicycle Network Map, and Appendix 1. Temporary sharrow markings shall be installed on Broadway between Avenue 18 and the Golden State Freeway to indicate the presence of bicyclists until such time as a bicycle lane is installed at the location, as described in the 2010 Bicycle Plan. 	DOT	DOT	By DOT

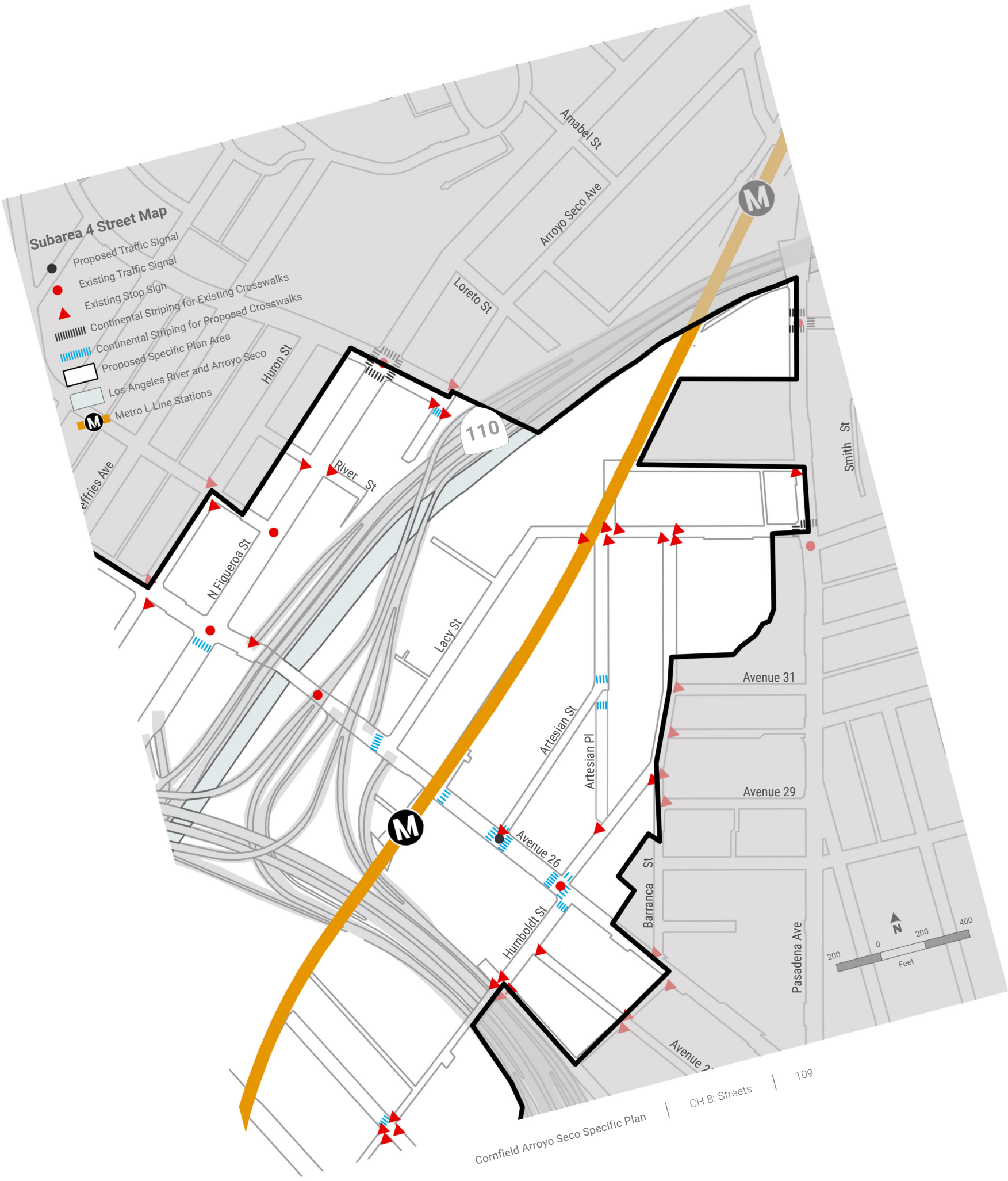


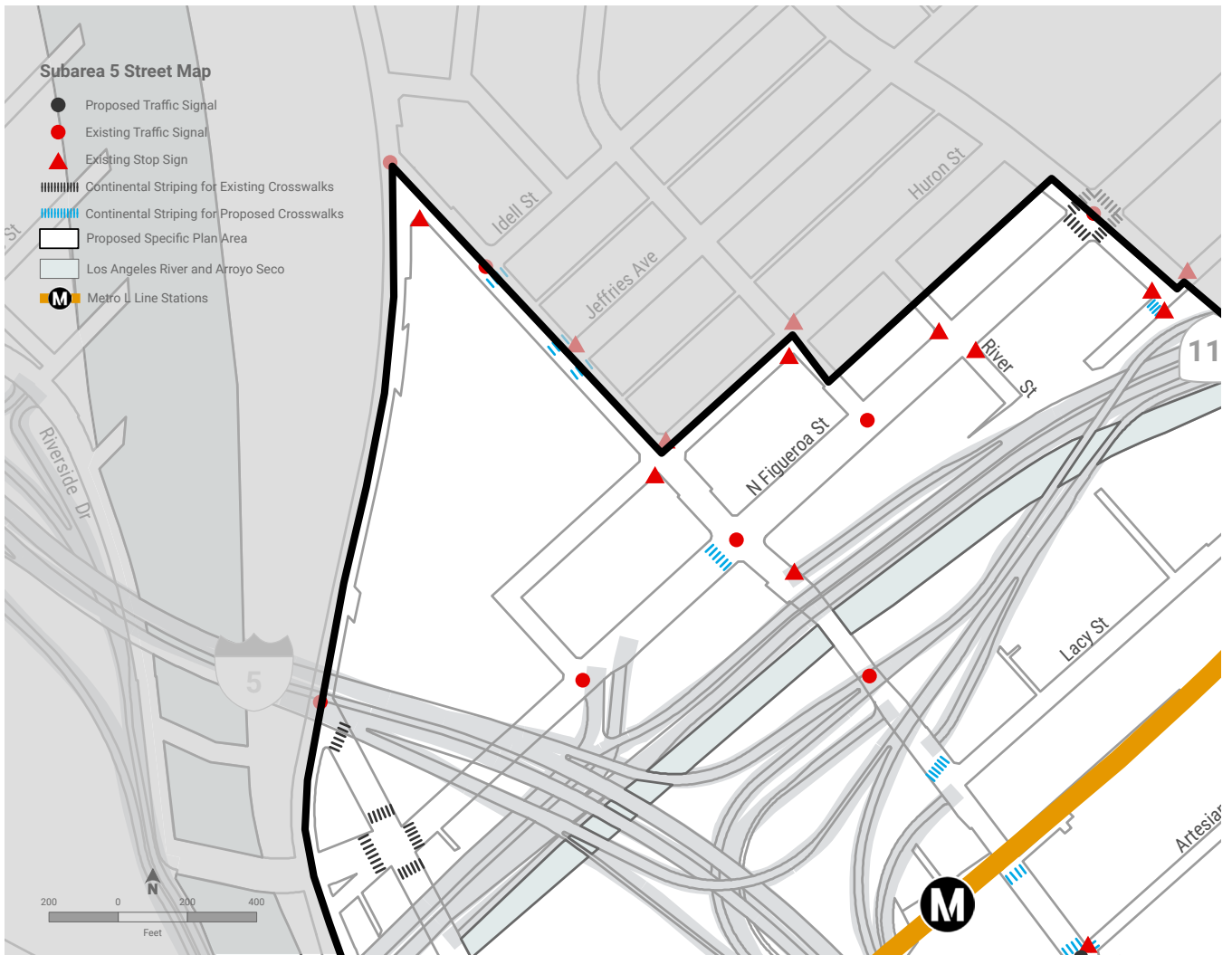


Subarea 3 Street Map

- Proposed Traffic Signal
- Existing Traffic Signal
- ▲ Existing Stop Sign
- ▤ Continental Striping for Existing Crosswalks
- ▤ Continental Striping for Proposed Crosswalks
- ▬ Proposed Paseo
- ▭ Proposed Specific Plan Area
- ▭ Los Angeles River and Arroyo Seco
- Ⓜ Metro L Line Stations









Chapter 9

Environmental

Standards

Environmental Standards to be released in conjunction with the Final Environmental Impact Report (EIR).



LOS ANGELES
CITY PLANNING
Community Planning



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

December 11, 2023

TO: City Planning Commission

FROM: Craig Weber, Principal City Planner

TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2021-2642-SP; CEQA: ENV-2021-2643-EIR

The following technical modifications are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of December 14, 2023, related to Item No. 11 on the meeting agenda.

Deleted text is shown in ~~strike through~~ and added text is shown in underline. All modifications are recommended for adoption.

A. Modifications to the Proposed CASP (Staff Report Exhibit B.1)

1. Addition of a Mesnager Street Extension Requirement

[ADDED] 8.B.4.c. Mesnager Street Extension. A Project that abuts the location of the Proposed Street Extension as identified in the Subarea 1 Street Map shall include an extension of Mesnager Street as a public right-of-way between Naud Street and North Main Street. The street extension shall meet the following requirements:

- i. Designed as a "shared street" that allows motor vehicle access at low speed.
- ii. Dedicated and improved to a minimum right-of-way width of 40 feet, including a 28-foot roadway width, 10-foot sidewalk width, and 2-foot parkway width.
- iii. A property owner shall only be responsible for their half of the extension for portions that abut a neighboring property.

2. Modification to Subarea 1 Street Map

The segment of the Proposed Paseo between Naud Street and North Main Street, as shown in the Subarea 1 Street Map, shall instead indicate a Proposed Street Extension with the legend revised accordingly.

PAGE 2

3. Modification to Urban Village Use District

5.C.2. Allowed Uses & Use Limitations

Use	Permission	Use Standard	Specification
Wholesale Trade & Warehousing	P*	(see <i>Light Industrial</i>) Non-residential tenant size (max) Relief	<u>15,000 SF</u> 25,000 SF C2

4. Modification to Urban Center Use District

5.D.2. Allowed Uses & Use Limitations

Use	Permission	Use Standard	Specification
Wholesale Trade & Warehousing	P*	(see <i>Light Industrial</i>) Non-residential tenant size (max) Relief	<u>15,000 SF</u> 25,000 SF C2

5. Modification to Urban Innovation Use District

5.E.2. Allowed Uses & Use Limitations

Use	Permission	Use Standard	Specification
Wholesale Trade & Warehousing	P*	(see <i>Light Industrial</i>) Non-residential tenant size (max) Relief	<u>15,000 SF</u> 25,000 SF C2

Appendix B

Bracketed Comment Letters



Michael Sin <michael.sin@lacity.org>

Technical Data Request: For the Cornfield Arroyo Seco Specific Plan Project

1 message

Sahar Ghadimi <sghadimi@aqmd.gov>
To: "michael.sin@lacity.org" <michael.sin@lacity.org>
Cc: Sam Wang <swang1@aqmd.gov>

Wed, Aug 2, 2023 at 8:43 AM

Dear Michael,

South Coast AQMD staff received the Notice of Availability of Draft Environmental Impact Report for the Cornfield Arroyo Seco Specific Plan (South Coast AQMD Control Number: LAC230726-04). Staff is currently in the process of reviewing the Draft Environmental Impact (DEI).

1

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Dear Phayvanh Nanthavongdouangsy,
Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources
(i.e. truck operations).

2

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by the end of this week. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

3

Thank you.

Sincerely,

Sahar Ghadimi

Air Quality Specialist, CEQA IGR

8/2/23, 8:51 AM

City of Los Angeles Mail - Technical Data Request: For the Cornfield Arroyo Seco Specific Plan Project

Planning, Rule Development & Implementation

South Coast Air Quality Management District

[21865 Copley Drive, Diamond Bar, CA 91765](#)

(909) 396-2392

sghadimi@aqmd.gov



Michael Sin <michael.sin@lacity.org>

Cornfield Arroyo Seco Specific Plan Update

Olson, Brian@DOC <Brian.Olson@conservation.ca.gov>

Thu, Aug 17, 2023 at 1:59 PM

To: "michael.sin@lacity.org" <michael.sin@lacity.org>

Cc: "OLRA@DOC" <OLRA@conservation.ca.gov>, OPR State Clearinghouse <state.clearinghouse@opr.ca.gov>, "Gomez, DarylAnne@DOC" <DarylAnne.Gomez@conservation.ca.gov>

SCH Number

2021040206

Lead Agency

City of Los Angeles

Document Title

Cornfield Arroyo Seco Specific Plan Update

Document Type

EIR - Draft EIR

Received

7/19/2023

Hello, Michael—

Thank you for providing the City's Cornfield Arroyo Seco Specific Plan Update for review. This email conveys the following recommendations from CGS concerning geologic and seismic hazard issues within the Specific Plan documents:

1. Liquefaction and Landside Hazards

The Specific Plan discusses liquefaction and landsliding as a potential seismic hazard. It mentions much of the project area is in "a liquefaction zone" (page 4.6-3) and the slopes bordering the northern edge of the project area are "designated as landslide zones" (page 4.6-5); however, it is not clear what the source of these zones are. The City should supplement this section with a discussion of the existing Earthquake Zones of Required Investigation (EZRI) for both liquefaction and earthquake-induced landsliding established by CGS for this area and consider providing figures depicting the locations of both types of zones.

CGS maps and data are available here:

<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>

<https://maps.conservation.ca.gov/cgs/EQZApp/app/>

<https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones-1/about>

<https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-landslide-zones-doc-hosted/about>

Cities and counties affected by EZRI must regulate certain development projects within them. The Seismic Hazards Mapping Act (1990) also requires sellers of real property (and their agents) within a mapped hazard zone to disclose that the property lies within such a zone at the time of sale.

1, cont

2. Earthquake Ground Motion Hazards

The Specific Plan might consider providing a discussion of the probability of large earthquakes in the region. This discussion may include earthquake probabilities from the third Uniform California Earthquake Rupture Forecast (UCERF3). A non-technical discussion of this model is available here: <https://pubs.usgs.gov/fs/2015/3009/pdf/fs2015-3009.pdf>

2



@CAgeosurvey

FOLLOW US!

Brian Olson, CEG

Senior Engineering Geologist

Seismic Hazards Program

13 Years of Public Service

California Geological Survey

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M: (213) 507-1080

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"A team is not a group of people who work together.

A team is a group of people who trust each other." – Simon Sinek

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September 18, 2023

Attn: Michael Sin
 Los Angeles Department of City Planning
 200 North Spring Street, Room 667
 Los Angeles, California 90012
Michael.Sin@lacity.org

VIA EMAIL ONLY

Re: Draft Environmental Impact Report for the Cornfield Arroyo Seco Specific Plan (Case No. ENV-2021-2643-EIR)

Dear Mr. Sin:

On behalf of the South East Asian Community Alliance (SEACA) and Public Counsel, we submit these comments on the Draft Environmental Impact Report (DEIR) for the Cornfield Arroyo Seco Specific Plan and Redevelopment Plan (the CASP, the Plan, or the Project).

SEACA was founded in 2002, with the stated mission to build power among Southeast Asian youth and their communities in Los Angeles for a more just and equitable society through intergenerational, multiethnic dialogue, leadership development, and community organizing. SEACA is located in Los Angeles' Chinatown district, which is included in portions of the CASP area. Many of SEACA's members live within the CASP area, and SEACA's members and their families would be affected by the environmental impacts of the Project. Public Counsel is a nonprofit public interest law firm dedicated to advancing civil rights and racial and economic justice. We partner with community based organizations to create affordable housing, prevent eviction and displacement, and advance housing justice throughout Los Angeles.

The California Environmental Quality Act (CEQA) requires full disclosure of a project's significant environmental effects so that decision-makers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences.¹ The environmental impact report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes.² An EIR is an "environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to

¹ *Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392 ("Laurel Heights").

² *In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.

environmental changes before they have reached ecological points of no return.”³ The EIR must not be obscure or incomplete.⁴ An EIR that is confusing or self-contradictory is inadequate.⁵ Courts have also emphasized that an EIR cannot be merely conclusory.⁶

2, cont.

The CASP DEIR concludes that the CASP’s impacts on displacement are less than significant. However, this conclusion is not supported by the facts. As these comments show, the DEIR is lacking significant pieces of information—if that information is considered, it must be concluded that the CASP actually may have potentially significant environmental impacts that the Plan must mitigate.

3

1. The DEIR does not adequately consider the risk of current CASP residents being displaced from the CASP area. When properly considered, the Plan’s impacts on displacement are actually “potentially significant.”

The analysis of impacts in the Land Use and Planning and Population, Housing, and Employment categories are inadequate. The DEIR concludes that the impacts on displacement are less than significant or nonexistent.⁷ However, the DEIR does not adequately consider the risk of current CASP residents being displaced from the CASP area.

First, in discussing Project Impact 4.12-2, the DEIR admits that while it doesn’t expect much redevelopment of existing multi-family housing in the Plan area, “displacement of some residences is a reasonably foreseeable result of development or redevelopment that could occur under the Proposed Project.”⁸ However, the DEIR then quickly concludes that the Plan’s increased capacity for housing development offsets any impacts.⁹ While this may be true in the long run, the DEIR explicitly ignores the time horizon of displacement: “[I]t would be speculative to attempt to identify how many units and people might be displaced, *and what the lag time, if any, might be.*”¹⁰

4

Second, in Project Threshold 4.10-1, the DEIR concludes that there will be no environmental impact with regards to physically dividing a community, because the project “does not include any features that would physically divide an established community.”¹¹ The DEIR implies that the CASP area does contain established communities, but concludes without any discussion that

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³ *Laurel Heights*, supra, 47 Cal. 3d at 392 (quoting *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal. App. 3d 818, 822).

⁴ *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 443.

⁵ *San Joaquin Raptor Center v. County of Merced* (2007) 149 Cal. App. 4th 645, 656 fn. 4.

⁶ See *Citizens of Goleta Valley*, supra, 52 Cal.3d at 568-569 (“As we have frequently observed, it is only the EIR that can effectively disclose to the public the ‘analytic route the ... agency traveled from evidence to action.’ ... In general ‘the EIR must contain facts and analysis, not just the agency’s bare conclusions or opinions.’”) (citations omitted).

⁷ DEIR Impact 4.12-2, p. 4.12-20; 4.10-1, p. 4.10-20.

⁸ DEIR, p. 4.12-21.

⁹ *Id.*

¹⁰ *Id.* (emphasis added).

¹¹ DEIR Impact 4.10-1, p. 4.10-20.

the Plan “does not introduce new land uses to the area that would include barriers that would divide existing neighborhoods.”¹² Instead, it quickly pivots to a discussion of how the Plan will “improve community cohesiveness.”¹³

5, cont.

As stated above, CEQA does not allow for the DEIR’s conclusions to be cursory.¹⁴ The DEIR’s analysis is also inadequate because it ignores the actual human impact of displacement. It is not appropriate to claim that displacement will not exist simply because of a net gain in housing units or because communities will have more access to each other. If current CASP residents are forced out of their homes for any period of time, that creates potentially significant impacts on Land Use and Housing in the Plan area. While the Plan does not anticipate infrastructure that will split the neighborhood, displacement of existing residents will physically divide what the Plan acknowledges is an established community. And, as we explain below, such displacement, whether temporary or permanent, causes spillover effects that implicate other environmental areas of concern in ways that this DEIR does not address.

6

The DEIR’s statement that existing state and local right of return and relocation laws stop displacement is also cursory and the truth is far more complicated.¹⁵ In fact, these laws merely give residents the *opportunity* to not be displaced. Relocation services are weak and often do not actually provide the support residents need. And there is no requirement that the relocation services prioritize relocating tenants within or in close proximity to the CASP area.

7

For these reasons, the DEIR must be revised to conclude that the Project’s cumulative impacts on Land Use and Planning and Population, Housing, and Employment are “potentially significant.”

2. The risk of displacement has secondary effects on other environmental sensitivities.

The potentially significant impacts described above are not isolated to the Land Use and Planning and Population, Housing, and Employment sections of the DEIR. If the Plan has a potentially significant impact on displacement, that will in turn cause potentially significant impact on other CEQA factors, such as transportation, greenhouse gasses, air quality, and recreation. Residents displaced from the CASP area will likely return to their prior neighborhoods to maintain their employment, recreation, and community connections. However, the DEIR fails to consider all of these spillover effects.

8

For example, low-income people are the vast majority of riders of public transit, with Chinatown in particular having among the highest rates of zero emission commuters in the city.¹⁶ Studies show that when low-income residents are supplanted by wealthier residents in transit oriented

¹² DEIR, p. 4.10-20.

¹³ *Id.*

¹⁴ *Citizens of Goleta Valley*, supra, 52 Cal.3d at 568-569.

¹⁵ DEIR, p. 4-12.22

¹⁶ 2018 American Community Survey.

development (TOD) areas, vehicle miles driven increase.¹⁷ Therefore, it is reasonable to conclude that displacement from the CASP will potentially result in additional vehicle miles traveled within, into, and out of the CASP area, as displaced residents return to their jobs, families, doctors, and social safety nets. This additional travel and the resulting emissions are not analyzed in the DEIR in the context of temporary or permanent displacement.

The DEIR's failure to analyze emissions and vehicle travel resulting from the direct and indirect displacement of low-income residents violates CEQA's mandate to evaluate the physical impacts of a project. If a project has an economic or social effect which in turn causes a physical change, such as an impact on air quality or greenhouse gas (GHG) emissions, that physical change may be a significant environmental impact.

For the foregoing reasons, the DEIR's conclusion that the Plan's impacts on displacement are less than significant is incorrect. These are potentially significant consequences. Therefore, the Plan must include measures to mitigate these potentially significant impacts on displacement within and from the CASP area.

3. The CASP must be revised to incorporate the following measures to mitigate potentially significant impacts it will have on displacement.

The DEIR inadequately analyzes the impacts of displacement and how such displacement impacts not just Land Use and Planning and Population, Housing, and Employment, but also other environmental factors CEQA requires be studied and potentially mitigated. The following mitigation measures are necessary to ensure that the CASP's displacement impacts are truly "less than significant."

a. Zoning

A major zoning change in the CASP is the expansion of the Urban Village zone, which will allow 100% residential projects as an allowable use. The CASP update also allows for residential development in the Urban Center and Urban Innovation zones, with some of the floor area set aside for non-residential uses. This change will increase the land value of parcels where residential uses were not previously allowed and potentially incentivize owners of those parcels to sell that land. While the CASP update incentivizes the provision of affordable housing and other community benefits in all residential development, this expansion of residential zoning nonetheless intentionally increases development pressure in the CASP. Increased development pressure will likely result in the incentivized development, which will increase displacement of current residents of the CASP.

¹⁷ Stephanie Pollack, Barry Bluestone & Chase Billingham, Dukakis Center for Urban and Regional Policy at Northeastern University, "Maintaining Diversity In America's Transit-Rich Neighborhoods: Tools for Equitable Neighborhood Change" (Oct. 2010).

Therefore, we recommend that the CASP update consider increasing affordability requirements to capture the additional land value created through the expansion of residential uses in the plan. In addition, the CASP must include additional anti-displacement measures as outlined below.

b. Anti-displacement

As a mitigation measure to offset the potentially significant impacts of displacement, the CASP should be revised to require the following anti-displacement policies:

i. Rehouse displaced tenants as quickly and as close to home as possible.

If a development will temporarily or permanently displace residents in the Plan area, the developer should first be required to offer any existing vacant units the developer already has that are within the CASP, at the tenant's existing rent.

If the developer has no vacant units within the CASP, the developer should then be required to offer any existing vacant units outside the CASP, at the tenant's existing rent, prioritizing those units closest to the Plan area. It should always be at the tenant's discretion whether they chose these offered replacement units, or the services of a relocation company to find them alternate accommodations.

ii. Displaced tenants should be able to avoid "double-moves."

Even if a developer builds a replacement unit for which a displaced tenant has a right of return, that tenant should have the option of remaining in their relocated unit on the same terms and conditions as they would be entitled to in the replacement unit under that right of return.

iii. Relocation Assistance Consultants should prioritize proximity to the CASP.

In the event a displaced tenant elects to utilize the services of the Relocation Assistance Consultant, the Consultant should use all reasonable efforts to provide replacement housing listings that are within the CASP or within 3 miles surrounding the CASP, and along the same public transit corridors as the housing the tenant is being displaced from.

iv. Displaced former CASP residents should have priority in newly-constructed housing in the Plan area.

Tenants who are displaced from the CASP should have the highest priority to obtain other affordable housing within the Plan area. The CASP should be revised to implement a local preference policy, which shall be written into the regulatory agreement for all future affordable housing developments in the CASP.

While the revised CASP is a significant improvement over the prior version, it still lacks some key components to balance neighborhood stabilization with increased development potential. This DEIR skips some key elements that will ensure the Project does not have any negative or unintended consequences on the families that already call the CASP area home. Thank you for your consideration of these comments. We look forward to reviewing the revisions to the draft environmental impact report.

11

Sincerely,



Sissy Trinh
Southeast Asian Community Alliance (SEACA)



Jonathan Jager
Public Counsel


Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

September 14, 2023

Michael Sin
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012
Sent by Email: michael.sin@lacity.org

RE: Cornfield Arroyo Seco Specific Plan Area – Case No. CPC-2021-2642-SP; ENV 2021-2643-EIR
Notice of Availability of Environmental Impact Report (EIR)

Dear Mr. Sin:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Cornfield Arroyo Seco Specific Plan Update (Plan) located in the City of Los Angeles (City). Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

Project Description

The Cornfield Arroyo Specific Plan Update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production.

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Comments

Transit Services and Facilities

The Plan and EIR should include updated information on existing and planned transit services and facilities within the Plan area. Metro encourages the City to continue providing for additional density for developments surrounding major transit stops which should include, without limitation, high-frequency bus stops and Metro Rail stations (as currently defined in the City's Transit Oriented Communities Affordable Housing Incentive Guidelines). Metro's NextGen Bus Plan should be used as a resource to determine the location of high-frequency bus stops within the Plan area. For more information, visit the NextGen Bus Plan's website at <https://www.metro.net/projects/nextgen/>. In addition, the Plan and EIR should include stations for all rail lines that are existing and under construction. Please refer to Metro's 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

3

Metro LA River Path Project

Funded by Measure M, Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro anticipates releasing the Draft Environmental Impact Report in Spring 2024 with an anticipated operation date beyond 2028. More information may be found online at: <https://www.metro.net/projects/lariverpath/>.

4

Connect US Action Plan

Completed in 2015 and adopted by the City Planning Commission as part of the Downtown Design Guide in 2017, the Connect US Action Plan's fundamental goal is to provide pedestrians and cyclists a safe and pleasurable passage to transit between Los Angeles Union Station, 1st/Central Station and adjacent historic neighborhoods. Enhancing walkability and bikeability will facilitate a second goal of connecting people who live and work in adjacent neighborhoods to one another. The City should review this plan and explore the possibility of carrying through the recommended mobility improvements into the Plan from adjacent corridors. The plan can be viewed [here](#).

5

Adjacency to Metro-owned Right-of-Way (ROW) and Facilities

The Plan area includes Metro-owned ROW and transit facilities for Metro Rail and Metro Bus. In particular, these lines include the L Line (Gold). In addition, the Metrolink commuter rail service is adjacent to parts of the Plan area. Metrolink is operated by the Southern California Regional Rail Authority (SCRRA), portions of which use Metro-owned ROW. Buses and trains operate 24 hours a day, seven days a week in these facilities.

6

The EIR's transportation section should analyze potential impacts on Metro and Metrolink facilities within the Plan area, and identify mitigation measures or project design features as appropriate. Metro recommends reviewing the Metro Adjacent Development Handbook (available at <https://www.metro.net/devreview>) to identify issues and best practices for

development standards arising from adjacency to Metro infrastructure. In addition, Metro recommends that the Plan include a policy encouraging applicants to coordinate with Metro during City Planning review if the subject parcel is within a 100-foot buffer of Metro infrastructure (per Zoning Information 1117). Such projects should also comply with the Adjacent Development Handbook.

6, cont.

Transit Supportive Planning: Recommendations and Resources

Considering the Plan area's inclusion or proximity to the Chinatown, Lincoln/Cypress, and Heritage Square Stations as well as several key bus lines, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro Rail stations, including orienting pedestrian pathways towards the station.
2. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Plan's development standards, including:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access Metro Rail stations and Metro Bus stops.
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The City should also coordinate with the Metro Bike Share program to explore potential Bike Share stations in the Plan area.
 - c. First & Last Mile Access: The City should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.

7

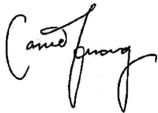
3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.
4. Wayfinding: Wayfinding signage should be considered as part of the Plan to help people navigate through the Plan area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.
5. Art: Metro encourages the thoughtful integration of art and culture into public spaces and will need to review any proposals for public art and/or placemaking facing a Metro ROW. Please contact Metro Arts & Design staff for additional information.

7, cont.

If you have any questions regarding this letter, please contact me by phone at 213-418-3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Cassie Truong
Senior Transportation Planner, Development Review Team
Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>


CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Letter 5

DATE: August 28, 2023

TO: Vincent P. Bertoni, AICP, Director of Planning
Department of City Planning

Attn: Michael Sin, City Planner
Department of City Planning

FROM: Rowena Lau, Division Manager 
Wastewater Engineering Services Division
LA Sanitation and Environment

**SUBJECT: CORNFIELD ARROYO SECO SPECIFIC PLAN UPDATE – NOTICE OF
AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT**

This is in response to your July 20, 2023 Notice of Availability of draft Environmental Impact Report for the proposed mixed-use project located within the boundaries of the existing Cornfield Arroyo Seco Specific Plan. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review it has been determined that the project is unrelated to sewers and does not require any hydraulic analysis. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Than Win at (323) 342-6268 or email at than.win@lacity.org.

RL/TW: ra

c: Julie Allen, LASAN
Michael Scaduto, LASAN
Spencer Yu, LASAN
Than Win, LASAN

November 9, 2023

Letter 6

Mr. Michael Sin
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Dear Mr. Sin:

Subject: City of Los Angeles Notice of Virtual Public Hearing and Hybrid City Planning
Commission Meeting Cornfield Arroyo Seco Specific Plan
Case Number: ENV-2021-2643-EIR

The Los Angeles Department of Water and Power (LADWP), submits this letter in reply to the Notice of Virtual Public Hearing and Hybrid City Planning Commission Meeting scheduled for September 27, 2023, from the City of Los Angeles Department of City Planning (Planning) in regards to the Cornfield Arroyo Seco Specific Plan.

LADWP Right of Way Engineering Group, on behalf of LADWP's Power System, coordinated the review of the request and has concluded that the proposed Project may impact LADWP facilities, which lies adjacent and within the LADWP's Transmission Line Right of Way (TLRW).

Planning shall provide additional information before any developments are authorized adjacent and/or within LADWP's TLRW and are subject to the following comments and conditions:

Comments:

1. Planning referenced herein shall pertain to its employees, agents, consultants, contractors, officers, patrons or invitees of Planning's, or by any other of Planning's affiliated entities.

2. The information provided, to date, is inadequate for properly reviewing the proposed improvements within sections of LADWP's TLRW. We therefore reserve the right to comment until more detailed information is provided regarding the proposed Project. Provide plans illustrating the LADWP TLRW boundaries within the proposed Project. Include towers and clearances from the proposed transmission line. Also, provide grading plans and utility plans, including any other plans illustrating the impacts to LADWP's TLRW. If access roads are proposed, provide plans illustrating impacts to LADWP's access roads. The plans should include APNs, state plane coordinates, or use the Public Land Survey System to locate the developments impacting LADWP's TLRW.
3. Plans may be submitted for review to the LADWP Real Estate Services Office via the following email: RE.Office@ladwp.com and copy LADWP's Environmental Affairs at environmental@ladwp.com.
4. Any temporary work within or immediately adjacent to LADWP's TLRW requires approval from LADWP.

2

Conditions:

1. Planning shall acknowledge the LADWP Transmission Line Rights-of-Way are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the North American Electric Reliability Corporation (NERC), an organization of the Federal Energy Regulatory Commission (FERC). Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals. The rights-of-way serve as platforms for access, construction, maintenance, facility expansion and emergency operations. Therefore, the proposed use may, from time to time, be subject to temporary disruption caused by such operations.
2. No improvements or construction activities of any kind whatsoever will be allowed within the LADWP TLRW without the prior written approval of the LADWP.
3. No equipment with the height over 14-feet shall be allowed to travel within the LADWP TLRW without the written approval of LADWP.
4. No grading or structures shall be constructed within the LADWP TLRW without prior written approval of the LADWP.

3

5. Vehicle and/or truck repair, refueling, washing, and change of oil, are prohibited within the TLRW.
6. LADWP prohibits the installation of any drainage structures or the discharging of drainage onto or within LADWP's TLRW without the written approval of LADWP.
7. Additional conditions may be required following review of detailed site plans, grading/drainage plans, etc.

3, cont.

This response shall not be construed as an approval to begin construction activities, project improvements, nor approval of this project.

If you have any questions, please contact Ms. Alexandria Fortaleza, of my staff, at (213) 367-0871 or alexandria.fortaleza@ladwp.com or Ms. Robin Yamada of my staff at (213) 367-4230 or robin.yamada@ladwp.com.

Sincerely,

Katherine Rubin Digitally signed by Katherine Rubin
Date: 2023.11.09 14:54:26 -08'00'

Katherine Rubin
Director of Corporate Environmental Affairs Division

AF:gn

c: Ms. Jane Hauptman
Ms. Alexandria Fortaleza
Ms. Maria Depaz
Ms. Robin Yamada

September 18, 2023

Letter 7

Michael Sin
Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, California 90012
Email: michael.sin@lacity.org

RE: Draft EIR Comments for the Cornfield Arroyo Seco Specific Plan Update

To Michael Sin,

As members of Chinatown Community for Equitable Development (CCED), we are submitting this public comment to respond to the CASP Update Draft EIR.

CCED is an all volunteer, multi-ethnic, intergenerational organization based in Los Angeles Chinatown that builds grassroots power through organizing, education, and mutual help. Over the course of our history, we have supported in building power and organizing against predatory landlords, fought against the entry of Wal-Mart and other market-rate projects, and supported the community with mutual aid during the COVID-19 pandemic.

1

We have strong concerns regarding the CASP Update and the findings of the Draft EIR.

While we appreciate the stated goal of increasing affordable housing in the area, we believe that what Chinatown and our neighbors in Lincoln Heights need to prevent displacement is 100% truly affordable housing. The existing CASP and TOC programs in place have largely overseen the construction of nearly all-market rate/zero affordable unit complexes being built both in the CASP zone and in Chinatown's core. The incentivized required percentage of affordable units, much less truly affordable units, is paltry. Clearly these incentive programs are only spurring more gentrification rather than providing any significant amount of affordable housing for the working class community members of Chinatown and surrounding areas.

2

Additionally, developments that heralded their affordable units now charge near market rate for affordable units and are still unaffordable for the working families and seniors who make up the large proportion of Chinatown residents. **In 2019, the 30.17% of residents in Chinatown are living below 100% of the poverty threshold.¹ Developments that comply with the minimum requirements of CASP Update incentives will not provide any meaningfully significant housing that is actually affordable to current residents in Chinatown.**

The substantial increase in population size must be studied in the EIR for how it will affect the neighborhood and current resources. Given that the CASP Update proposes to increase the population by six to ten times, this will lead to a massive increase in resident

3

¹ From the USC Price Neighborhood Data for Social Change, American Community Survey 5-year estimates

population along with visitors, patrons, and employees. The impact of bringing in thousands of new units, most that are not affordable and will not be useful for the current residents in Chinatown, must be fully analyzed and considered. Of particular concern are the impacts on traffic, pedestrian safety, pollution, and the current already underfunded neighborhood resources (including schools, access to health care, public transit, etc.) that need to exist to support this massive influx in residents.

3, cont.

While the CASP area is further away from Chinatown's primary residential areas, the effects of gentrification are still felt in Chinatown. There is no clearer example than what happened to the shopping mall formerly known as "The Shop" at the corner of Spring and College. Where once there were dozens of legacy small business, now stands the shell of a new office building by RedCar Properties. RedCar Properties has been scooping up properties across Chinatown for almost a decade, evicting longtime tenants and remodeling buildings for office space in anticipation of the influx of middle and upper class residents that the CASP would bring in through its promotion of majority-market rate developments. This is the indirect displacement caused by the CASP and CASP Update's incentive programs, which would open the door for developments with 60%-90% unaffordable housing.

4

We strongly urge against adoption of this iteration of the CASP Update and call for a more transparent and community driven process to update zoning in the CASP area in ways that would both benefit and safeguard the livelihoods of the community members.

5

Chinatown Community for Equitable Development



STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY Gavin Newsom, Governor
DEPARTMENT OF FISH AND WILDLIFE Charlton H. Bonham, Director

South Coast Region
3883 Ruffin Road | San Diego, CA 92123
wildlife.ca.gov

September 14, 2023

Letter 8

Michael Sin
200 N Spring St, Room 667
Los Angeles, CA 90012
Michael.Sin@lacity.org

Subject: Draft Environmental Impact Report for Cornfield Arroyo Seco Specific Plan Update, SCH #2021040206, City of Los Angeles, Los Angeles County

Dear Michael Sin:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report for the Cornfield Arroyo Seco Specific Plan (CASP) Update (Project) proposed by the City of Los Angeles (City). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation

1

Michael Sin
September 14, 2023
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of the Project as proposed may result in “take”, as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.). CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

1, cont.

Project Description and Summary

General Site Description: The Project Area is approximately 600 acres (0.93 square miles) and is located within the original floodplains of the Los Angeles River and Arroyo Seco water bodies, which are part of the lower Los Angeles River Watershed. The Project Area is predominantly developed, with transportation infrastructure being a central feature of the Project Area. Interstate 5 (I-5) and State Route-110 (SR-110) bisect the northern portion of the Project Area. Entrances and exits to and from SR-110 are located on the northern perimeter of the Project Area. The Los Angeles County Metropolitan Authority (LA Metro) L Line (Gold) cuts across the northern portion of the Project Area and provides frequent access to downtown Los Angeles, northeastern sections of Los Angeles, and the cities of South Pasadena and Pasadena.

Location: The Project Area is located entirely within Los Angeles City Council District One, and is generally bordered by Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north.

Objective: The Proposed Project is an update of the existing CASP. The update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project would strengthen the existing CASP’s affordable housing requirements, including the recalibration of the CASP’s existing incentive zoning system; establish a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; include provisions that facilitate the production of new 100% affordable housing and permanent supportive housing projects on public land; increase the zoning capacity for housing in targeted areas; and adopt a modernized zoning system based on the City’s new modular Zoning Code. The Proposed Project would supersede the text, maps, and tables of the existing CASP, and will include the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), community plans, the Los Angeles Municipal Code (LAMC) Chapter 1 and Chapter 1A, specific plans, and other City ordinances.

2

Michael Sin
September 14, 2023
Page 3 of 17

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the City consider our comments and recommendations when preparing an environmental document that may provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151].

3

Specific Comments

Comment #1: Impacts on Burrowing Owls (*Athene cunicularia*)

Issue: The Project may impact over-wintering burrowing owls, which is designated as a California Species of Special Concern (SSC).

Specific impacts: Project ground-disturbing activities such as vegetation removal will result in habitat destruction and may lead to death or injury of individuals. Project construction and activities may also disrupt foraging behavior.

Why impacts would occur: The DEIR acknowledges that burrowing owl have "been known to nest in manmade objects such as pipes and riprap" (page 4.3-25) and have a low potential to occur in the Project area. The DEIR proposes mitigation measure 4.3-2 on page 4.3-27 to perform a pre-construction survey and "All project applicants will be notified of and shall include on their plans an acknowledgement of the requirement to comply with the federal MBTA [Migratory Bird Treaty Act] and CFGC [California Fish and Game Code] [...]" prior to Project activities. The mitigation measures, as presented, may not reduce impacts to a level less than significant if burrowing owls are detected. The measure proposes a general pre-construction survey. According to CDFW's Staff Report on Burrowing Owl Mitigation, burrowing owls require specific time of year surveys (CDFW 2012). Moreover, the DEIR does not discuss mitigation for potential loss of habitat. If the Project removes this habitat for burrowing owls, then regional cumulative impacts to burrowing owl habitat would occur. The DEIR should incorporate a mitigation measure that outlines replacement of burrowing owl habitat.

4

Evidence impacts would be significant: A SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

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1. if the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
2. if the species is listed as threatened or endangered under Endangered Species Act (ESA)-, but not CESA-, threatened, or endangered;
3. if the species meets the State definition of threatened or endangered but has not formally been listed;
4. if the species is experiencing, or formerly experienced, serious (nonscyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
5. if naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA-threatened or -endangered status (CDFW 2023a).

5, cont.

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the Project Applicant shall perform a preconstruction survey of the Project area for burrowing owls no further out then 14 days prior to construction activities. The preconstruction survey shall be conducted by a qualified biologist. If ground-disturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing ground-disturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st

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through August 31st) and a non-disturbance buffer shall be demarcated within 500 feet of the burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.

6, cont.

Mitigation Measure #2: Compensatory Mitigation – If the Project will impact habitat supporting burrowing owls, the Project applicant shall offset impacts on habitat supporting this species at no less than a 3:1 mitigation ratio. The Project Applicant shall set aside replacement habitat either on site or off site at a mitigation ratio approved by CDFW. Replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.

7

Comment #2: Impacts to Bat Species

Issue: The Project may impact several bat species, including western mastiff bat (*Eumops perotis californicus*) and big free-tailed bat (*Nyctinomops macrotis*), that are listed as SSC.

Specific impacts: The DEIR identifies western mastiff bat and big free-tailed bat in records of the California Natural Diversity Database (CNDDDB) on page 4.3-2. Project activities include ground disturbing activities that may disturb areas that may provide foraging habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, mobilizing, and grading), and vibrations caused by heavy equipment.

8

Why impacts would occur: The removal of vegetation may potentially result in the loss or disturbance of foraging and roosting habitat for bats. Construction activities will temporarily increase the disturbance levels as well as human activity in the Project area. Moreover, a general preconstruction biological reconnaissance survey conducted during daytime hours have potential for bats present on site to be undetected. This may cause the Project to impact individuals not previously known to reside in or around the Project area. Bats would require more species-specific and specific time-of-day surveys.

Evidence impacts would be significant: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Several bat

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species are considered SSC and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of California Species of Special Concern could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

9, cont.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #3: Prior to construction activities, a qualified bat specialist shall conduct bat surveys within project areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be used to maximize detection of bat species and to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be included in the final EIR. The final EIR shall also discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

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Mitigation Measure #4: If maternity roosts are found work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

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Additional Recommendations

Recommendation #1 – Biological Assessment: CDFW recommends modifying Mitigation Measure 4.3-1 on page 4.3-27 of the MND to include underlined language and remove language with strikethrough.

“For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include:

12

An adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact

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analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. A biological resource assessment should include the following information:

- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2023b);
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The [Manual of California Vegetation Online](#) should also be used to inform this mapping and assessment (CNPS 2023). Adjoining habitat areas should be included in this assessment if the Project could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a Project. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. ~~a review of the California Natural Diversity Database~~

12, cont.

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~~(CNDDDB) and iNaturalist maps to~~ This search may determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or bat species. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur on the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2023c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the USFWS; and,
- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a 1-year period, and assessments for rare plants may be considered valid for a period of up to 3 years. Some aspects of a proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases."

12, cont.

Recommendation #2 – Scientific Collecting Permits: CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits](#) webpage for information (CDFW

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2023d). Pursuant to the California Code of Regulations, title 14, section 650, the qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities.

13, cont.

Recommendation #3 – Updating the California Natural Diversity Database:

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2023e). Information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2023f).

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Recommendation #4 – Rodenticides: Rodenticides and second-generation anticoagulant rodenticides should be prohibited both during and over the life of the Project.

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Conclusion

CDFW appreciates the opportunity to provide comments and recommendations regarding the Project to assist the City of Los Angeles in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW looks forward to reviewing an ensuing Project-related environmental document. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

Sincerely,

DocuSigned by:
Jennifer Turner
C3D449ECB7C14DE...

Jennifer Turner, acting for:
David Mayer
Environmental Program Manager
South Coast Region

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ec: CDFW
Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov
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Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov

OPR
State Clearinghouse – State.Clearinghouse@opr.ca.gov

References:

- [CDFW] California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>
- [CDFW] California Department of Fish and Wildlife. 2023a Species of Special Concern. Available from: <https://wildlife.ca.gov/Conservation/SSC>
- [CDFW] California Department of Fish and Wildlife. 2023b. Natural Communities. Available at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>
- [CDFW] California Department of Fish and Wildlife. 2023c. Survey and Monitoring Protocols and Guidelines. Available at: <https://wildlife.ca.gov/conservation/survey-protocols>
- [CDFW] California Department of Fish and Wildlife. 2023d. Scientific Collecting Permit. Available from: <https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678>
- [CDFW] California Department of Fish and Wildlife. 2023e. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.
- [CDFW] California Department of Fish and Wildlife. 2023f. Combined Rapid Assessment and Releve Form. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into the Project's environmental document.

Biological Resources (BIO)		
Mitigation Measure (MM) or Recommendation (REC)	Timing	Responsible Party
MM-BIO-1 - Burrowing Owl Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the City shall perform a preconstruction survey of the Project area for burrowing owls no further than 14 days prior to construction activities. The preconstruction survey shall be conducted by a qualified biologist. If ground-disturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing ground-disturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1 st through August 31 st) and a non-disturbance buffer shall be	Prior to issuance of development permit	City of Los Angeles (City)/Project Applicant

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	demarcated within 500 feet of the burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.		
MM-BIO-2-Burrowing Owl	If the Project will impact habitat supporting burrowing owls, the Project applicant shall offset impacts on habitat supporting this species at no less than a 3:1 mitigation ratio. The Project Applicant shall set aside replacement habitat either onsite or offsite at a mitigation ratio approved by CDFW. Replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which shall include an appropriate endowment to provide for the long-term management of mitigation lands.	Prior to issuance of development permit	City/Project Applicant
MM-BIO-3-Bats	Prior to construction activities, a qualified bat specialist shall conduct bat surveys within project areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be used to maximize detection of bat species and to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings shall be included in the final EIR. The final EIR shall also discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.	Prior to issuance of development permit	City/Project Applicant
MM-BIO-4-Bats	If maternity roosts are found, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but	Prior to issuance of	City/Project Applicant

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	are yet ready to fly out of the roost (March 1 to September 30).	development permit	
REC-1 - Biological Assessment	<p>CDFW recommends modifying Mitigation Measure 4.3-1 on page 4.3-27 of the MND to include <u>underlined</u> language and remove language with strikethrough.</p> <p>“For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include:</p> <p><u>An adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts.</u></p> <p><u>CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. A biological resource assessment should include the following information:</u></p> <p>a) <u>Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should</u></p>	<p>Prior to issuance of development permit</p> <p>City/Project Applicant</p>	

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	<p>include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the Vegetation Classification and Mapping Program - Natural Communities webpage (CDFW 2023b);</p> <p>b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;</p> <p>c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The Manual of California Vegetation Online should also be used to inform this mapping and assessment (CNPS 2023). Adjoining habitat areas should be included in this assessment if the Project could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;</p> <p>d) A complete, recent, assessment of the biological resources associated with each habitat type on site</p>		
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	<p>and within adjacent areas that could also be affected by a Project. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. a review of the California Natural Diversity Database (CNDDDB) and inaturalist maps to This search may determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or bat species. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur on the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(f)]:</p> <p>e) <u>A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as</u></p>	
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	<p>wintering, roosting, nesting, and foraging habitat. <u>Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's Survey and Monitoring Protocols and Guidelines for established survey protocol for select species (CDFW 2023c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the USFWS; and,</u></p> <p>f) <u>A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a 1-year period, and assessments for rare plants may be considered valid for a period of up to 3 years. Some aspects of a proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases."</u></p>		
<p>MM-BIO-2-Scientific Collecting Permits</p>	<p>CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's Scientific Collection Permits webpage for information (CDFW 2023d). Pursuant to the California Code of Regulations, title 14, section 650, the qualified biologist must obtain appropriate handling permits to capture, temporarily</p>	<p>Prior to Project ground disturbing activities</p>	<p>City/Project Applicant</p>

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	possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities.		
MM-BIO-3-CNDDB	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDB by completing and submitting CNDDB Field Survey Forms (CDFW 2023e). Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2023f).	Prior to Project ground disturbing activities	City/Project Applicant
REC-4-Rodenticide	Rodenticides and second-generation anticoagulant rodenticides should be prohibited both during and over the life of the Project.	Prior to Project ground disturbing activities	City/Project Applicant



Build HOPE: Investing in People and Place

October 13, 2023

Via E-Mail and U.S. Mail

Letter 9

City of Los Angeles
Department of City Planning
Case Number: ENV-2021-2643-EIR
200 N. Spring Street, Room 667
Los Angeles, CA 90012
michael.sin@lacity.org

Re: Comment Letter re Draft Environmental Impact Report (SCH #2021040206) for the Cornfield Arroyo Seco Specific Plan (CASP) Update

To whom it may concern:

The Housing Authority of the City of Los Angeles (HACLA) has received and reviewed the Draft Environmental Impact Report (Draft EIR) for the proposed Cornfield Arroyo Seco Specific Plan (CASP) Update (Project). The Draft EIR considers broad specific plan level issues and evaluates the effects of the Project to the Project Area, with the intent to streamline environmental review of future site-specific approvals in the Project Area that are consistent with CASP. (Draft EIR, pp. 1-3 through 1-4.)

HACLA respectfully submits these comments on the Draft EIR as a responsible agency for a potential future project within the Project Area. As we have discussed, HACLA is concerned that the Draft EIR fails to identify or impose any feasible mitigation measures or alternatives for impacts to historic resources. HACLA encourages the City to identify and impose all feasible mitigation measures to reduce impacts to historic resources, and to examine an alternative to the CASP Project that would reduce impacts to historic resources in compliance with the California Environmental Quality Act (Pub. Resources Code, §21000, *et seq.*: “CEQA”).

1. HACLA has an interest in the sufficiency of the Draft EIR because the Draft EIR is a Program EIR that must be used for later activities in the program.

The CASP EIR is a program EIR that encompasses, among other things, the future redevelopment of housing on the William Mead site, a public housing community owned and managed by HACLA. (CASP EIR, pp. 1-3 and 1-4; *see* CEQA Guidelines, §15168, subd. (a) [a program EIR is used to analyze the environmental impacts of a series of actions characterized as one project and related either geographically, or as logical parts in a chain of contemplated actions, or in connection with the issuance of plans to govern the conduct of a continuing program].)

Housing Authority of the City of Los Angeles

📍 2600 Wilshire Blvd., Los Angeles, CA 90057 📞 833-HACLA-4-U ✉ info@hacla.org 🌐 hacla.org

Once a program EIR is certified, later activities that are “within the scope” of the program must be examined in light of the program EIR to determine whether subsequent environmental review is required. (CEQA Guidelines, § 15168(c); *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 425-426.) To determine whether subsequent environmental review is required, later activities in the program are examined in light of the criteria in CEQA Guidelines, section 15162. (CEQA Guidelines, § 15168(c)(2); *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, 1316.) Subsequent environmental review is required only if the agency discovers new impacts that were unaddressed in the program EIR. (*IBC Business Owners for Sensible Development v. City of Irvine* (2023) 88 Cal.App.5th 100, 119.)

2 cont.

Thus, it is imperative that the program EIR contain a comprehensive and specific analysis of the impacts, mitigation measures, and alternatives of the CASP, especially regarding impacts to historic resources, to ensure its utility for use with later activities, including HACLA’s potential redevelopment of housing on the William Mead site. (See CEQA Guidelines, § 15168(c)(5) [“A program EIR will be most helpful in dealing with later activities if it . . . deals with the effects of the program as specifically and comprehensively as possible.”].) Streamlining is critical to encourage and facilitate affordable housing within the Project area. (See CASP EIR, p. 3-22 [“Objectives of the Proposed Project are . . . [i]ncrease the production of affordable, mixed-income, and permanent supportive housing within the Project Area”].) **The Draft EIR fails to adequately analyze or mitigate Project impacts on historical resources.**

CEQA provides that “public agencies should not approve projects as proposed if there are . . . feasible mitigation measures available which would substantially lessen the significant environmental effect of such projects.” (Pub. Resources Code, §§21002; see *id.*, 21002.1(b) [agencies must mitigate significant effects of projects they approve “whenever it is feasible to do so”]; CEQA Guidelines, §15126.4(a)(1) [“An EIR shall describe feasible measures which could minimize significant adverse impacts”].) A lead agency must identify potentially feasible measures to mitigate significant adverse impacts to the significance of a historical resource. (CEQA Guidelines, §15064.5(b)(4).)

3

According to Chapter 4.4 of the Draft EIR, significant and unavoidable impacts may result from “demolition and/or significant alteration” to the 37 historical resources identified within the Project Area. (Draft EIR, pp. 4.4-33 through 4.4-34.) Although the Draft EIR identifies the impact to historical resources as significant, it fails to actually analyze the implications of this impact. Thus, the Draft EIR minimizes such effects, leaving the decision makers and the public with little understanding, if any, as to the severity and extent of environmental impacts. (See, e.g., *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831 [a lead agency may not jump to the conclusion that impacts would be significant without disclosing to the public and decision makers information about how adverse the impacts would be].)

Without knowing the severity and extent of CASP’s impacts on historical resources, it is not possible to formulate feasible mitigation measures. In fact, the Draft EIR proposes no mitigation measures for historic resources, nor does it analyze whether and to what extent mitigation could reduce the potentially significant impact. The Draft EIR must identify feasible mitigation that can reduce the significant impact, even if it cannot be reduced to less than

significant. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 523 [“mitigation must be at least partially effective, even if they cannot mitigate significant impacts to less than significant”]; CEQA Guidelines, §15370 [legally adequate mitigation must minimize significant impacts].) HACLA has identified feasible mitigation measures for impacts to historic resources and has discussed these with the City, however, the City has decided not to include them in the Draft EIR.

3 cont.

The City has included historic resource mitigation for other specific plans, such as the Warner Center Specific Plan. There, the certified Draft EIR (SCH No. 1990011055)¹ determined that with the implementation of the following mitigation measures, impacts to historic resources would be less than significant (Warner Center Specific Plan Draft EIR, pp. 4.4-12 through 4.4-13):

Mitigation Measure CUL-1: For discretionary projects in the Specific Plan area the City shall require that to the extent feasible, the preservation, rehabilitation, restoration, reconstruction or adaptive reuse of known historic resources shall meet the U.S. Secretary of the Interior’s Standards for Rehabilitation. Any proposal to preserve, rehabilitate, restore, reconstruct, or adaptively reuse a known historic resource in accordance with the Secretary of the Interior’s Standards shall be deemed to not be a significant impact under CEQA and, in such cases no additional mitigation measures will be required.

4

Mitigation Measure CUL 2: For discretionary projects in the Specific Plan area the City shall require that in the event that a future development project is proposed on a site containing a potential historic property, the City shall require, as part of the environmental review of the project, a site specific historic resources assessment to determine whether the property is a historic resource under CEQA. If the assessment determines that the potential historic property is a historic resource, the City shall undertake the analysis and impose mitigation measures required under CUL 1 and CUL 2.

CEQA also recognizes that documenting a historical resource can serve as sufficient mitigation. (CEQA Guidelines, §15126.4(b)(2).) As currently written, the Draft EIR lacks substantial evidence that mitigation measures such as these are infeasible and that the Project’s impacts to historical resources are unavoidable. Therefore, HACLA encourages the City to explore the feasibility and potential for reducing CASP’s significant impact to historical resources through the implementation of similar mitigation.

Relatedly, Chapter 5.0 Alternatives of the Draft EIR states, “[u]nder the Proposed Project, implementation of Mitigation Measures 4.4-1(a), (b) and (c) would reduce the potential to disturb historic resources . . .” (See Draft EIR, pp. 5-19, 5-31, 6-3.) However, Mitigation Measures 4.4-1(a), (b), and (c) do not appear anywhere in the Draft EIR. Section 4.4 of the Draft EIR states that there are no feasible mitigation measures for impacts to historical resources. (Draft EIR, p. 4.4-34.) The contradictory information in the Draft EIR regarding Mitigation Measures 4.4-1(a), (b), and (c) has deprived HACLA and the public of a meaningful opportunity

5

¹ https://planning.lacity.org/eir/WarnerCntrRegionalCore/DEIR/Draft_EIR.pdf

to comment on the substantial adverse impact on historical resources and feasible mitigation measures. The Draft EIR needs to be revised and recirculated to consider feasible mitigation measures that lessen the historical resource impact so that the public can meaningfully participate in this process. (CEQA Guidelines, §15088.5(a).)

5 cont.

2. The Draft EIR fails to identify feasible alternatives that would substantially lessen the CASP's significant impacts to historic resources.

“It is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which substantially lessen the significant environmental effects of such projects.” (Pub. Resources Code, § 21002.) An EIR therefore violates CEQA when the alternatives analyzed therein “do not contribute to a reasonable range of alternatives that fostered informed public participation and decision-making.” (*Save Our Capitol! v. Department of General Services* (2023) 87 Cal.App.5th 655, 703.) Accordingly, an EIR must identify feasible alternatives that would avoid or substantially lessen the project's significant environmental effects. (*Id.* at 702; Pub. Resources Code, §§ 21002, 21100(b)(4).)

The Draft EIR considered three alternatives: Alternative 1: No Project Alternative, Alternative 2: No Urban Village Alternative, and Alternative 3: Reduced Urban Village Alternative. (Draft EIR, p. 5-4.) According to the Draft EIR, Alternative 2: No Urban Village Alternative and Alternative 3: Reduced Urban Village Alternative may result in “slightly reduced impacts to historical resources.” (Draft EIR, p. 5-19, 5-30.) None of these alternatives substantially lessen the significant impact to historical resources.

6

The City should consider alternatives that focus on substantially reducing significant impacts to historical resources. For example, in the certified West Gate Specific Plan Draft EIR (SCH No. 1995052002)², the City of Fontana considered Alternative 3: Historic Preservation Alternative that reduced the significant impact on historic resources. (West Gate Specific Plan Draft EIR, p. ES-10.)

Alternatives such as this would not only feasibly attain most of the project objectives but also avoid or substantially lessen the significant impact on historical resources. HACLA therefore urges the City to revise and recirculate the EIR to consider an alternative like this for the CASP.

3. Conclusion

Given the EIR's lack of sufficient analysis of the Project's significant and unavoidable impact to historical resources, in particular the lack of feasible mitigation measures and reasonable range of alternatives, HACLA believes that the City falls short of fully complying with CEQA until these issues have been addressed.

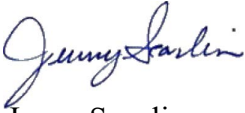
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² <https://www.fontanaca.gov/DocumentCenter/View/38282/Westgate-Specific-Plan-Draft-EIR>

HACLA appreciates the opportunity to submit these comments. Please contact Zoe Kranemann, Development Officer, via email at Zoe.Kranemann@hacla.org should you have any questions.

7 cont.

Sincerely,



Jenny Scanlin
Chief Development Officer



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Michael Sin, City Planner

City of Los Angeles, Department of City Planning

Case Numbers: CPC-2021-2642-SP and ENV-2021-2643-EIR

200 N. Spring Street, Room 667

Los Angeles, CA 90012

September 15, 2023

Letter 10

**Notice of Availability of a Draft Environmental Impact Report (EIR) for
the Proposed Cornfield Arroyo Seco Specific Plan (CASP) Project (SCH# 2021040206)
(Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include completion of CEQA air quality impact analysis during operational activities, additional air quality mitigation measures recommended for construction, overlapping construction and operational activities, and information about South Coast AQMD rules and permits that the Lead Agency should include in the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the Draft PEIR

The Lead Agency envisions development of the Proposed Project to align local and regional development objectives, thereby fostering more affordable housing choices and ensuring stability of the existing vulnerable communities.¹

Based on the Draft EIR, the Proposed Project consists of proposed updates to the City of Los Angeles' CASP. This includes new land use and zoning regulations, incentives, and boundaries for the future construction of residential units on 600 acres land.² The Proposed Project is bounded by Cypress Park to the north, Lincoln Heights to the east, Main Street to the south, and Chinatown to the west.³ For this Draft EIR, the development of the proposed growth identified in the Specific Plan is assumed to occur by the horizon year of 2040.⁴

South Coast AQMD Staff's Comments

Completion of CEQA Air Quality Impacts Analysis During Operation Activities

Based on the Draft EIR, the lead agency has not provided any analysis for emissions for localized significant thresholds (LSTs) for operation. The lead agency has stated that the Draft EIR does not contain analysis on LSTs for operational, citing the absence of project-level data for the Proposed Project. Nevertheless, even though the precise projects have yet to be defined,

¹ Draft EIR. p. 74.

² Ibid. p. 75.

³ Ibid. p. 75.

⁴ Ibid. p. 15.

in pursuant to CEQA guidelines section 15064 -Determining the Significance of the Environmental Effects Caused by a project – the lead Agency is responsible for performing an in-depth and detailed analysis of an estimation of the potential localized and regional air quality impact analysis. Thus, it is recommended to add a table in the air quality impact section for evaluating the maximum daily on-site operational emissions using CalEEMod⁵ land use emissions software, and subsequently, compare these emissions against the South Coast AQMD LSTs. It is important to note that the localized analysis can be conducted either by using the LST screening tables or by performing dispersion modeling. This analysis will provide us with a preliminary assessment of the potential air quality impacts, both at the regional and localized levels, arising from the Proposed Project.

2 cont.

Air Quality Mitigation Measures for NOx and PM Emissions from Construction

Given the long-range plan of the Proposed Project from 2023-2040, Tier 4 technology may not be the cleanest technology when construction occurs later for individual projects. According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor's Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.⁶ Considering the scope of the project, it is crucial to ensure that the levels of construction emissions, specifically NOx and PM₁₀, remain below significant thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, where feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. The abatement of NOx can also be pursued by enforcing greener constructions, such as, limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. Additionally, several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook⁷ for both operational and construction emissions.

3

Overlapping Construction and Operational Activities

Even though the Proposed Project consists of approximately a total of 600 acres of land over the course of 17-year construction, the Draft EIR does not analyze the scenario of overlapping between the construction and operational activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider the overlapping construction and operation. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

4

⁵ CalEEMod is available free of charge at:
www.caleemod.com.

⁶ Presentation can be found at:
<http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf>

⁷ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment (e.g., internal combustion engines), permits from South Coast AQMD are required. The Final EIR should include a discussion on any existing and new stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

5

Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Draft EIR for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

6

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

LAC230726-04

Control Number

Appendix C

William Mead Homes Project - Cultural Resources Impact Report



William Mead Homes Project

Cultural Resources Impacts Report

prepared for

Housing Authority of the City of Los Angeles

2600 Wilshire Boulevard

Los Angeles, California 90057

Contact: Zoe Kranemann, Development Officer

prepared by

Rincon Consultants, Inc.

250 East 1st Street, Suite 1400

Los Angeles, California 90012

March 2024



RINCON CONSULTANTS, INC. SINCE 1994

Confidentiality

The following document contains sensitive and confidential information concerning archaeological sites. This report should be held confidential and is not for public distribution. Archaeological site locations are exempt from the California Public Records Act, as specified in Government Code 6254.10, and from the Freedom of Information Act (Exemption 3), under the legal authority of both the National Historic Preservation Act (PL 102-574, Section 304[a]) and the Archaeological Resources Protection Act (PL 96-95, Section 9[a]). Sections of this report contain maps and other sensitive information. Distribution should be restricted appropriately.

Please cite this report as follows:

Perzel, R., J. Williams, L. Kry, S. Treffers and M. Strauss.

2024 *William Mead Homes Project Cultural Resources Impact Report*. Rincon Consultants Project No. 24-15622. Report on file at the South Central Coastal Information Center, California State University, Fullerton, California.

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Executive Summary

Rincon Consultants, Inc. (Rincon) was retained by the Housing Authority of the City of Los Angeles (HACLA) to conduct a cultural resources impacts assessment in support of the William Mead Homes Project (project) located within the City of Los Angeles' Cornfield Arroyo Seco Specific Plan (CASP) area. Totalling roughly 20-acres, the proposed project site is currently developed with William Mead Homes, a public housing complex that was constructed in 1941-1942 and has been previously determined eligible for listing in the National Register of Historic Places (NRHP) with the California State Historic Preservation Officers (SHPO) concurrence. The project includes the demolition of all existing development on the project site and the site's redevelopment with several apartment buildings ranging from one to seven stories in height. This report was prepared in conformance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5 for historical resources and 21083.2 for archaeological resources, and applicable local guidelines and regulations. HACLA is the lead agency under CEQA.

This assessment includes a California Historical Resources Information System (CHRIS) records search; a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search; background research including in-depth review of geotechnical, soil remediation, archival, academic, and ethnographic information; a review of past historical resources surveys, inventories, and previous historical resources evaluations of William Mead Homes; an archaeological and built environment pedestrian survey of the project site; an analysis of the sensitivity of the project site to contain archaeological resources; and an impacts assessment and recommended mitigation measures for archaeological and built environment resources.

The background research and field survey completed as part of this study confirmed the presence of one previously determined NRHP-eligible property within the project site, William Mead Homes. William Mead Homes has been determined eligible for listing in the NRHP under Criterion A for its association with the development of public and defense worker housing in Los Angeles during World War II, and under NRHP Criterion C as an excellent example of a Los Angeles public housing development that embodies the planning and design principles of the Garden City and Modern movements. SHPO concurred with the eligibility determination in 2002. Due to its formal determination of NRHP eligibility, the property is automatically listed in the California Register of Historical Resources (CRHR) and is considered a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines. Therefore, its proposed demolition and redevelopment under the project would result in a substantial adverse change to historical resources as defined in Section 15064.5(b) of the CEQA Guidelines. Measures to minimize this significant impact have been recommended, specifically the production and maintenance of an interpretive display and informational website to convey the history of the property.

The CHRIS records search identified two previous cultural resource investigations (LA-05425 and LA-08521) that overlap the project site and collectively address approximately 80 percent of the project site. The CHRIS records search also identified six previous cultural resource studies that were conducted in areas immediately adjacent to the project site. Additionally, CHRIS records indicate that one previously recorded cultural resource is located within the project site (P-19-002828). This resource consists of one historic period refuse deposit. The site record for P-19-002828 notes that the resource was inadvertently encountered during remedial soils removal activities and that the resource was partially collected as part of an emergency recovery response in October 2000. The resource was assigned a California Office of Historic Preservation (OHP) status code of 5 indicating it

is considered historically significant by local government but is ineligible for the NRHP. However, it is important to note that a subsequent report (LA-05425) prepared in January 2021 documenting the recovery and assessment of P-19-002828 concluded that the resource was not significant, as it has already yielded all of the data it is likely to contain. Nevertheless, the report surmises that there may be portions of this resource that have yet to be encountered that may contain data that may provide information relative to changes over time. No newly identified archaeological resources were found within the project site nor was any evidence of resource P-19-002828 identified during the pedestrian survey.

The pedestrian field survey conducted for this study identified no archaeological resources within the project site. Additionally, a review of historical maps and aerial photographs indicates the project site has been subject to substantial ground disturbance starting as early as 1888 up to 1960. A review of reports documenting previous soil remediation activities performed on site in 2000, 2001, 2004, and 2005, indicated that nearly 40,000 cubic yards of soil has been removed from the project site. While the locations and depths associated with these excavations and soil removal are unknown, the Soil Management, Implementation and Enforcement Plan indicates that no soil from below ground surface (bgs) to a depth of 4 feet 6 inches within the entire Restricted Areas of the project site is to be excavated, suggesting soils below that depth are intact. Additionally, a review of the geotechnical report prepared for the project site encountered artificial fill soils from surface elevations to approximately 3 feet bgs. A search of the NAHC SLF was positive for known Native American heritage resources.

The results of the CHRIS records search, the NAHC SLF search, background research, pedestrian survey, and the project site's proximity to the Los Angeles River indicate there is potential of encountering unknown archaeological resources within undisturbed native alluvial soils (below approximately 4 feet 6 inches) to maximum depths of proposed disturbance. Therefore, Rincon recommends mitigation measures to ensure that any inadvertent discovery of archaeological resources will be treated appropriately and in accordance with CEQA regulations, specifically Workers Environmental Awareness Program (WEAP) training, archaeological monitoring, and inadvertent discovery procedures. These recommended mitigation measures and adherence to existing regulations will ensure that potential project impacts to archaeological resources and human remains would be reduced to less-than-significant.

1 Introduction

Housing Authority of the City of Los Angeles (HACLA) retained Rincon Consultants Inc. (Rincon) to conduct a cultural resources impacts assessment in support of the William Mead Homes Project (project) located in the Cornfield Arroyo Seco Specific Plan (CASP) area of the City of Los Angeles (City). This technical report documents the results of the study and tasks conducted by Rincon including a California Historical Resources Information System (CHRIS) records search; a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search; background research including an in-depth review of geotechnical, soil remediation, archival, academic, and ethnographic information; a review of historical resources surveys and inventories, and previous historical resource evaluations of William Mead Homes; and an archaeological and built environment pedestrian survey. This study has been completed pursuant to the requirements of the California Environmental Quality Act (CEQA), and applicable local guidelines and regulations. HACLA is the lead agency under CEQA.

1.1 Project Site and Description

The project site encompasses portions of Section(s) 22 of Township 1S, Range 13W on the *Los Angeles, California* United States Geological Survey (USGS) 7.5-minute topographic quadrangle (Figure 1). It is located at 1300 North Cardinal Street in the city of Los Angeles and encompasses the following Los Angeles County Assessor's parcels: 5409-011-900, -901, -902, -903 (Figure 2). The project site is currently developed with William Mead Homes, a public housing complex that was constructed in 1941-1942. The proposed project encompasses the demolition of all onsite development and construction of a new housing complex to meet current California Building Code and Americans with Disabilities Act (ADA) standards. The new development will include several buildings ranging from one to seven stories spread and will integrate a central greenspace. The current project design involves a maximum excavation depth of 20 feet below ground surface (bgs) for proposed subterranean levels.

1.2 Personnel

Rincon Senior Architectural Historian and Cultural Resources Director Steven Treffers, MHP, provided management oversight for this cultural resources study. Archaeologist Andrea Ogaz, MA, RPA, conducted the cultural resources records search. Architectural Historian Rachel Perzel, MA, conducted background research and is a contributing author to this report. Architectural Historian James Williams, MA, and Senior Archaeologist Linda Kry, BA, RA, conducted the field survey and performed background research; they are contributing authors to this report. Geographic Information Systems Katherina Castanon prepared the figures found in this report. Mr. Treffers and Cultural Resources Senior Principal Monica Strauss, MA, RPA, reviewed this report for quality control. Mr. Treffers, Ms. Ogaz, Ms. Perzel, Mr. Williams, and Ms. Strauss meet the Secretary of the Interior's Professional Qualifications Standards in their respective fields (National Park Service 1983).

Figure 1 Regional Location

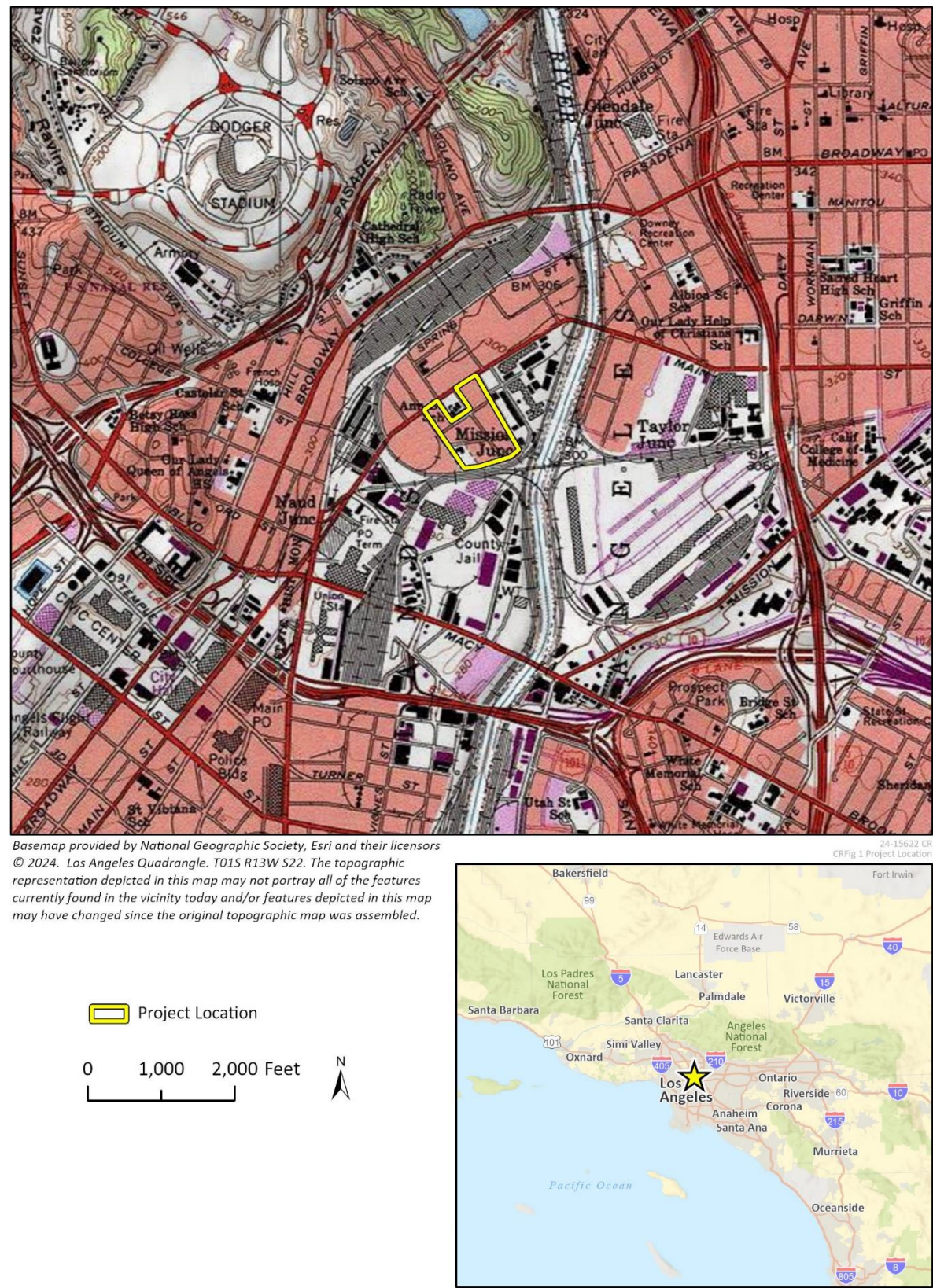


Figure 2 Project Site



2 Regulatory Setting

This section includes a discussion of the applicable state and local laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during implementation of the project.

2.1 California Environmental Quality Act

California Public Resources Code (PRC) Section 21084.1 requires lead agencies to determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the National Register of Historic Places (NRHP) are automatically listed in the CRHR, as are California Historical Landmarks 770 and above; both are therefore historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a “unique archaeological resource” as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (CEQA Guidelines Section 15064.5[c][4]). CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines Section 15064.5[b][2][A]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

The requirements for mitigation measures under CEQA are outlined in CEQA Guidelines Section 15126.4(a)(1). In addition to being fully enforceable, mitigation measures must be completed within a defined time period, have a nexus with, and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (CEQA Guidelines Section 15126.4[b][3]).

2.1.1 National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 CFR Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

- Criterion A:** Is associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B:** Is associated with the lives of persons significant in our past
- Criterion C:** Embodies the distinctive characteristics of a type, period, or method of installation, 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
- Criterion D:** Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

- Location:** The place where the historic property was constructed or the place where the historic event occurred
- Design:** The combination of elements that create the form, plan, space, structure, and style of a property
- Setting:** The physical environment of a historic property

Materials:	The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property
Workmanship:	The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory
Feeling:	A property's expression of the aesthetic or historic sense of a particular period of time
Association:	The direct link between an important historic event or person and a historic property

Certain properties are *generally* (emphasis added) considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

2.1.2 California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and Title 14 Section 4852. The CRHR 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 (Public Resources Code, 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (Public Resources Code, 5024.1(b)). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2011). Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995:2).

A property is eligible for listing in the CRHR if it meets one of more of the following criteria:

- Criterion 1:** Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- Criterion 2:** Is associated with the lives of persons important to our past
- Criterion 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
- Criterion 4:** Has yielded, or may be likely to yield, information important in prehistory or history

2.1.3 Assessing Impacts under CEQA

The thresholds for determining the significance of environmental impacts on historical resources are derived from Section 15064.5(b) of the *CEQA Guidelines*. The *CEQA Guidelines* state that “a project with an effect 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.” Substantial adverse change occurs when the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings materially impairs its significance. Material impairment occurs when a project:

- a. Demolishes 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 CRHR; 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 PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1 of the PRC, 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 CRHR as determined by a lead agency for purposes of CEQA.

2.2 California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner’s authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

2.3 California Public Resources Code §5097.98

Section 5097.98 of the California Public Resources Code states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code §7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

2.4 Local Regulations

2.4.1 City of Los Angeles

Local landmarks in the City of Los Angeles are known as Historic-Cultural Monuments (HCM) and are managed under the aegis of the City of Los Angeles Planning Department, Office of Historic Resources (OHR). A monument or local landmark is defined in the Cultural Heritage Ordinance as any site (including significant trees or other plant life located on the site), building, or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic, or social history of the nation, State, or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State, or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style, or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age (Los Angeles Municipal Code Section 22.171.7; added by Ordinance No. 178,402; effective 4-2-07). Additionally, the City adopted a Historic Preservation Overlay Zones (HPOZ) Ordinance which identifies and protects neighborhoods with distinct architectural and cultural resources. The City has an expansive program of HPOZs, commonly known as historic districts, and provides for review of proposed exterior alterations and additions to historic properties in designated districts.

3 Natural and Cultural Setting

This section provides background information pertaining to the natural and cultural context of the project site. It places the project site within the broader natural environment which has sustained populations throughout history. This section also provides an overview of regional indigenous history, local ethnography, and post-contact history. This background information describes the distribution and type of cultural resources documented within the vicinity of the project site to inform the cultural resources sensitivity assessment and the context within which resources have been evaluated.

3.1 Natural Setting

The project site lies in the Los Angeles Basin roughly at sea level. None of the surrounding area retains its natural setting, with the project site located in an area characterized by a mix of development including industrial, institutional, and multi-family residential. Located just east of the project site, the Los Angeles River was channelized in the mid-twentieth century. Vegetation within the vicinity of the site consists of ornamental trees, including low ground cover and succulents, consistent with urban environmental settings and has manicured landscapes.

3.2 Cultural Setting

3.2.1 Indigenous History

Numerous chronological sequences have been devised to aid in understanding cultural changes in southern California. Building on early studies and focusing on data synthesis, Wallace (1955; 1978) developed a prehistoric chronology for the southern California coastal region that is still widely used today and is applicable to near-coastal and many inland areas, including the current project site. Four periods are presented in Wallace's prehistoric sequence: Early Man, Milling Stone, Intermediate, and Late Prehistoric. Although Wallace's (1955) synthesis initially lacked chronological precision due to a paucity of absolute dates (Moratto 1984), this situation has been alleviated in recent years by the compilation of thousands of radiocarbon dates obtained by southern California researchers (Byrd and Raab 2007). Several revisions have been made to Wallace's (1955) synthesis using radiocarbon dates and projectile point assemblages (e.g., Koerper and Drover 1983; Mason and Peterson 1994; Koerper et al. 2002).

Horizon I - Early Man (ca. 10,000 – 6000 BCE)

When Wallace defined the Horizon I (Early Man) period in the mid-1950s, there was little evidence of human presence on the southern California coast prior to 6000 BCE. Archaeological work in the intervening years has identified numerous pre-8000 Before Common Era (BCE) sites, both on the mainland coast and the Channel Islands (e.g., Erlandson 1991; Johnson et al. 2002; Moratto 1984; Rick et al. 2001). The earliest accepted dates for occupation in the region are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly establishes the presence of people in this area about 10,000 years ago (Erlandson 1991). On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago (Johnson et al. 2002).

Recent data from Horizon I sites indicate the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas (e.g., Jones et al. 2002) and on Pleistocene lakeshores in eastern San Diego County (see Moratto 1984). Although few Clovis-like or Folsom-like fluted points have been found in southern California (e.g., Dillon 2002; Erlandson et al. 1987), it is generally thought the emphasis on hunting may have been greater during Horizon I than in later periods. Common elements in many sites from this period, for example, include leaf-shaped bifacial projectile points and knives, stemmed, or shouldered projectile points, scrapers, engraving tools, and crescents (Wallace 1978). Subsistence patterns shifted around 6000 BCE coincident with the gradual desiccation associated with the onset of the Altithermal climatic regime, a warm and dry period that lasted for about 3,000 years. After 6000 BCE, a greater emphasis was placed on plant foods and small animals.

Horizon II - Milling Stone (6000–3000 BCE)

The Milling Stone Horizon of Wallace (1955, 1978) and Encinitas Tradition of Warren (1968) (6000 to 3000 BCE) are characterized by subsistence strategies centered on collecting plant foods and small animals. Food procurement activities included hunting small and large terrestrial mammals, sea mammals, and birds; collecting shellfish and other shore species; near-shore fishing with barbs or gorges; the processing of yucca and agave; and the extensive use of seed and plant products (Kowta 1969). The importance of the seed processing is apparent in the dominance of stone grinding implements in contemporary archaeological assemblages, namely milling stones (metates and slabs) and handstones (manos and mullers). Milling stones occur in large numbers for the first time during this period and are more numerous still near the end of this period. Recent research indicates Milling Stone Horizon food procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions (Byrd and Raab 2007).

Milling Stone Horizon sites are common in the southern California coastal region between Santa Barbara and San Diego, and at many inland locations (e.g., Langenwaller and Brock 1985; Sutton 1993; True 1958). Wallace (1955, 1978) and Warren (1968) relied on several key coastal sites to characterize the Milling Stone period and Encinitas Tradition, respectively. These include the Oak Grove Complex in the Santa Barbara region, Little Sycamore in southwestern Ventura County, Topanga Canyon in the Santa Monica Mountains, and La Jolla in San Diego County. The well-known Irvine site (CA-ORA-64) has occupation levels dating between ca. 6000 and 4000 BCE (Drover et al. 1983; Macko 1998).

Stone chopping, scraping, and cutting tools made from locally available raw material are abundant in Milling Stone/Encinitas deposits. Less common are projectile points, which are typically large and leaf-shaped, and bone tools such as awls. Items made from shell, including beads, pendants, and abalone dishes, are generally rare. Evidence of weaving or basketry is present at a few sites. Kowta (1969) attributes the presence of numerous scraper-planes in Milling Stone sites to the preparation of agave or yucca for food or fiber. The mortar and pestle, associated with pounding foods such as acorns, were first used during the Milling Stone Horizon (Wallace 1955, 1978; Warren 1968).

Cogged stones and discoidals are diagnostic Milling Stone period artifacts, and most specimens have been found at sites dating between 4000 and 1000 BCE (Moratto 1984). The cogged stone is a ground stone object with gear-like teeth on its perimeter. Discoidals are similar to cogged stones, differing primarily in their lack of edge modification. Discoidals are found in the archaeological record subsequent to the introduction of the cogged stone. Cogged stones and discoidals are often purposefully buried and are found mainly in sites along the coastal drainages from southern Ventura County southward, with a few specimens inland at Cajon Pass, and heavily in Orange County (Dixon

1968:63; Moratto 1984). These artifacts are often interpreted as ritual objects (Eberhart 1961; Dixon 1968), although alternative interpretations (such as gaming stones) have also been put forward (e.g., Moriarty and Broms 1971).

Characteristic mortuary practices of the Milling Stone period or Encinitas Tradition include extended and loosely flexed burials, some with red ochre, and few grave goods such as shell beads and milling stones interred beneath cobble or milling stone cairns. “Killed” milling stones, exhibiting holes, may occur in the cairns. Reburials are common in the Los Angeles County area, with north-oriented flexed burials common in Orange and San Diego counties (Wallace 1955, 1978; Warren 1968).

Koerper and Drover (1983) suggest Milling Stone period sites represent evidence of migratory hunters and gatherers who used marine resources in the winter and inland resources for the remainder of the year. Subsequent research indicates greater sedentism than previously recognized. Evidence of wattle-and-daub structures and walls has been identified at several sites in the San Joaquin Hills and Newport Coast area (Mason et al. 1991, 1992, 1993; Koerper 1995; Strudwick 2005; Sawyer 2006), while numerous early house pits have been discovered on San Clemente Island (Byrd and Raab 2007). This architectural evidence and seasonality studies suggest semi-permanent residential base camps were relocated seasonally (de Barros 1996; Koerper et al. 2002; Mason et al. 1997) or permanent villages from which a portion of the population left at certain times of the year to exploit available resources (Cottrell and Del Chario 1981).

Horizon III - Intermediate (3000 BCE – CE 500)

Following the Milling Stone Horizon, Wallace’s Intermediate Horizon and Warren’s Campbell Tradition in Santa Barbara, Ventura, and parts of Los Angeles counties, date from approximately 3000 BCE to CE 500 and are characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. The Campbell Tradition (Warren 1968) incorporates David B. Rogers’ (1929) Hunting Culture and related expressions along the Santa Barbara coast. In the San Diego region, the Encinitas Tradition (Warren 1968) and the La Jolla Culture (Moriarty 1966; Rogers 1939; 1945) persist with little change during this time.

During the Intermediate Horizon and Campbell Tradition, there was a pronounced trend toward greater adaptation to regional or local resources. For example, an increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites along the California coast during this period. Related chipped stone tools suitable for hunting are more abundant and diversified, and shell fishhooks become part of the tool kit during this period. Larger knives, a variety of flake scrapers, and drill-like implements are common during this period. Projectile points include large side-notched, stemmed, and lanceolate or leaf-shaped forms. Koerper and Drover (1983) consider Gypsum Cave and Elko series points, which have a wide distribution in the Great Basin and Mojave deserts between ca. 2000 BCE and CE 500, to be diagnostic of this period. Bone tools, including awls, were more numerous than in the preceding period, and the use of asphaltum adhesive was common.

Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment. Hopper mortars and stone bowls, including steatite vessels, appeared in the tool kit at this time as well. This shift appears to correlate with the diversification in subsistence resources. Many archaeologists believe this change in milling stones signals a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn (e.g., Glassow et al. 1988; True 1993). It has been argued that mortars and pestles may have been used initially to process roots (e.g., tubers, bulbs, and corms associated with

marshland plants), with acorn processing beginning at a later point in prehistory (Glassow 1997) and continuing to European contact.

Characteristic mortuary practices during the Intermediate Horizon and Campbell Tradition included fully face-down or face-up flexed burials, oriented toward the north or west (Warren 1968). Red ochre was used commonly, and abalone shell dishes were found infrequently. Interments sometimes occurred beneath cairns or broken artifacts. Shell, bone, and stone ornaments, including charmstones, were more common than in the preceding Encinitas Tradition. Some later sites include Olivella shell and steatite beads, mortars with flat bases and flaring sides, and a few small points. The broad distribution of steatite from the Channel Islands and obsidian from distant inland regions, among other items, attest to the growth of trade, particularly during the latter part of this period. Recently, Byrd and Raab 2007 (220–221) have suggested the distribution of Olivella grooved rectangle beads marks “a discrete sphere of trade and interaction between the Mojave Desert and the southern Channel Islands.”

Horizon IV- Late Prehistoric Horizon (CE 500–Historic Contact)

In the Late Prehistoric Horizon (Wallace 1955; 1978), which lasted from the end of the Intermediate (ca. CE 500) until European contact, there was an increase in the use of plant food resources in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely worked projectile points, usually stemless with convex or concave bases, suggests an increased usage of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Other items include steatite cooking vessels and containers, the increased presence of smaller bone and shell circular fishhooks, perforated stones, arrow shaft straighteners made of steatite, a variety of bone tools, and personal ornaments made from shell, bone, and stone. There is also an increased use of asphalt for waterproofing and as an adhesive.

Many Late Prehistoric sites contain beautiful and complex objects of utility, art, and decoration. Ornaments include drilled whole Venus clam (*Chione* spp.) and drilled abalone (*Haliotis* spp.). Steatite effigies become more common, with scallop (*Pecten* spp. and *Argopecten* spp.) shell rattles common in middens. Mortuary customs are elaborate and include cremation and interment with abundant grave goods. By CE 1000, fired clay smoking pipes and ceramic vessels began to appear at some sites (Drover 1971, 1975; Meighan 1954). The scarcity of pottery in coastal and near-coastal sites implies ceramic technology was not well developed in the area, or that ceramics were obtained by trade with neighboring groups to the south and east. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry which functioned in the same capacity as ceramic vessels.

During this period, there was an increase in population size accompanied by the advent of larger, more permanent villages (Wallace 1955). Large populations and, in places, high population densities are characteristic, with some coastal and near-coastal settlements containing as many as 1,500 people. Many of the larger settlements were permanent villages in which people resided year-round. The populations of these villages may have also increased seasonally.

In Warren’s (1968) cultural ecological scheme, the period between CE 500 and European contact is divided into three regional patterns. The Chumash Tradition is present mainly in the region of Santa Barbara and Ventura counties; the Takic or Numic Tradition is present in the Los Angeles, Orange, and western Riverside counties region; and the Yuman Tradition is present in the San Diego region. The seemingly abrupt changes in material culture, burial practices, and subsistence focus at the

beginning of the Late Prehistoric period are thought to be the result of a migration to the coast of peoples from inland desert regions to the east. In addition to the small triangular and triangular side-notched points similar to those found in the desert regions in the Great Basin and Lower Colorado River, Colorado River pottery and the introduction of cremation in the archaeological record are diagnostic of the Yuman Tradition in the San Diego region. This combination suggests a strong influence from the Colorado Desert region.

In Los Angeles, Orange, and western Riverside counties, similar changes (introduction of cremation, pottery, and small triangular arrow points) are thought to be the result of a Takic migration to the coast from inland desert regions. This Takic or Numic Tradition was referred to formerly as the “Shoshonean wedge” or “Shoshonean intrusion” (Warren 1968). This terminology, originally used to describe an Uto-Aztecan language group, is generally no longer used to avoid confusion with ethnohistoric and modern Shoshonean groups who spoke Numic languages (Heizer 1978; Shipley 1978:). Modern Gabrielino (alternately Gabrieleño) in this region are considered the descendants of the prehistoric Uto-Aztecan, Takic-speaking populations who settled along the California coast during this period or perhaps somewhat earlier.

3.2.2 Ethnographic Setting

Gabrielino (Gabrieleño)/Tongva

The project site lies in the traditional territory of the Gabrielino (Gabrieleño)/Tongva. The name “Gabrielino” or “Gabrieleño” denotes those people, who were administered by the Spanish Missionaries from the San Gabriel Mission. It includes people from the Gabrielino area proper, as well as other social groups nearby (Kroeber 1925, Plate 57, Bean and Smith 1978: 538). The term Gabrieleño was imposed upon the Tribe by Spanish Missionaries. Many modern Gabrielino identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and refer to themselves as the Tongva (King 1994). This term is used in the remainder of this section to refer to the pre-colonized inhabitants of the Los Angeles Basin and their descendants.

Archaeological evidence points to the Tongva arriving in the Los Angeles Basin sometime around 500 BCE, and the Tongva note their presence in the area going back thousands of years (Villa 2017). Today, the Tongva people are active in protecting their Tribal cultural resources in the greater Los Angeles Basin and three Channel Islands: present-day San Clemente, San Nicolas, and Santa Catalina.

The Tongva language belongs to the Takic branch of the Uto-Aztecan language family, which can be traced to the Great Basin region (Mithun 2001). This language family includes dialects spoken by the nearby Juaneño and Luiseño to the southeast, the Serrano and Cahuilla to the northeast, and the Tataviam to the northwest. Yet, it is considerably different from the Chumash people living to the northwest and the Diegueño people (including the Ipai, Tipai, and Kumeyaay) to the south.

The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast. The tribal population is estimated to have been at least 5,000 in 1770 (Bean and Smith 1978: 540), but recent ethnohistoric work suggests a number closer to 10,000 (O’Neil 2002). Political organization followed a patrilocal and patrilineal pattern. Typically, the oldest son would lead a family. Chieftainship was also passed down patrilineally. A *Chari*, or chief of a village or political grouping, was separate from religious leadership (King 2011).

At the time of Spanish colonization, the basis of Tongva religious life was the Chinigchinich religion, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws

and institutions, and taught people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws (Kroeber 1925: 637–638). The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the Southern Takic groups as Christian missions were being built. Elements of Chinigchinich beliefs suggest it was a syncretic mixture of Christianity and native religious practices (McCawley 1996: 143–144).

Houses constructed by the Tongva were large, circular, domed structures made of willow poles, thatched with tule, and sheltered up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probable communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996: 27).

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the Tribe exploited the mountains, foothills, valleys, deserts, including riparian and estuarine areas, as well as open and rocky coastal ecological niches. Like most Native Californians, acorns were the staple food. By the time of the early Intermediate Period, acorn processing was an established industry. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, insects, and large and small mammals were also consumed (Kroeber 1925: 631–632, Bean and Smith 1978: 546, McCawley 1996: 119–123, 128–131).

The Tongva used a wide variety of tools and implements to gather food resources. These included the bow and arrow, traps, digging sticks, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. The Tongva made oceangoing plank canoes (known as a *ti'at*) capable of holding six to 14 people and used for fishing, travel, and trade between the mainland and the Channel Islands. Tule reed canoes were employed for near-shore fishing (McCawley 1996: 117–127). Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, *manos* and *metates*, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make *ollas* and cooking vessels (Kroeber 1925: 629, McCawley 1996: 129–138).

Deceased Tongva were either buried or cremated. Inhumation was more common on the Channel Islands and the neighboring mainland coast, and cremation was more predominate on the remainder of the coast and in the interior (Harrington 1942, McCawley 1996: 157). At the behest of the Spanish missionaries, cremation essentially ceased during the Post-Colonization Period (McCawley 1996: 157).

Today, the Tongva people continue to inhabit the Los Angeles Basin (Tongvar) and continue to advocate for the preservation and continued practice of their cultural heritage and language. At least five groups tie their ancestral lineage to the Gabrieleño/Tongva people: The Gabrieleño Band of Mission Indians - Kizh Nation, the Gabrieleño/Tongva San Gabriel Band of Mission Indians, the Gabrieleño/Tongva Nation of the Greater Los Angeles Basin, The Gabrielino-Tongva Tribe, and the Gabrielino Tongva Indians of California Tribal Council.

3.2.3 Post-Colonization Setting

Post-contact history for the state of California is generally divided into three periods: the Spanish Period (1769 to 1822), Mexican Period (1822 to 1848), and American Period (1848 to present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and

1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769-1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodríguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Rawls and Bean 1968, Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1885, Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspár de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California with the purpose of integrating the Native American population into Christianity and communal enterprise. In addition to the missions, three pueblos, or towns, were established during this period, two of which, San José and Los Angeles remain as California cities. Incentives were provided to bring settlers to these pueblos.

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914).

Mexican Period (1822-1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Gutierrez and Orsi 1998).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land.

During the supremacy of the ranchos (1834 to 1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848 - Present)

The United States went to war with Mexico in 1846. During the first year of the war, John C. Fremont traveled from Monterey to Los Angeles with reinforcements for Commodore Stockton and evaded Californian soldiers in Santa Barbara's Gaviota Pass by taking the route over the San Marcos grade instead (Kyle 2002). The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as United States territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through the 1850s. The discovery of gold in the northern part of the state led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

Local History

The proposed project site is located in the CASP Area, which was surveyed for historical resources by LSA Associates, Inc. (LSA) in 2011. The CASP survey area, which includes the project site, comprises 660 acres and roughly 1,600 assessor's parcels in an area northeast of downtown Los Angeles, just east of Chinatown; it additionally includes portions of the Lincoln Heights neighborhood. The following history of the area is excerpted from the *Historic Resources Survey – Cornfield Arroyo Seco Specific Plan Area City of Los Angeles, California* (LSA 2011), which was reviewed as part of the current study and was prepared to provide historic context and gain an understanding of potential historical resources located in the CASP Area.

The survey area contains some of the oldest developed areas of Los Angeles. The site where Gaspar de Portola's 1769 expedition camped in Los Angeles is believed to be along the Los Angeles River just south of where it is joined by the Arroyo Seco Wash. In 1781, settlers from Spain and Mexico founded the Pueblo de Los Angeles about a mile south of the survey area along the river.

Agriculture provided the main source of industry for the nascent Pueblo, which grew slowly along the river during most of the nineteenth century. By 1820, the Pueblo was home to 650

Californio residents. In 1847, the U.S. gained possession of the Pueblo during the Mexican-American War. Under U.S. control, the riverfront began to industrialize. The Southern Pacific Railroad (SPRR)/River Station was completed in the 1870s and triggered a large wave of European and Chinese immigrants. The River Station became a major industrial and commercial center, connecting Los Angeles to major U.S. cities and the East. Much of the early growth of Los Angeles can be attributed to the development of the riverfront industrial center.

In the early 20th century, Los Angeles expanded across the river east into Lincoln Heights. In 1910, Henry G. Parker and Hugo Eckardt constructed the first monumental bridge across the Los Angeles River. The classically styled North Main Street Bridge connected East Los Angeles to Downtown. One year later, in 1911, the Buena Vista Viaduct (now called the North Broadway-Buena Vista Bridge) was completed. At the time, this bridge was the longest and widest concrete arch bridge in California. Designers Homer Hamlin and Alfred P. Rosenheim incorporated Ionic arches and balustrades to complement the North Main Street Bridge. Eighteen years later, the North Spring Street Viaduct was completed. John C. Shaw designed the North Spring Street Viaduct to relieve traffic on the North Broadway Bridge. Shaw's design continued the classical style of the two earlier bridges, linking the three bridges as a thematic sub-group that connects Lincoln Heights to Downtown. All three bridges were designated as City Historic Cultural Monuments in 2008.

Some of the original industrial and commercial buildings still exist along the riverfront. The Standard Oil Company of California buildings on North Spring Street served as sales department and provided industrial facilities for one of the most powerful corporations in the world. Rockefeller's Standard Oil of California was one of the "seven sisters" that ran the oil industry during the 20th century and later became Chevron Corporation. The Baker Iron Works Site, on North Broadway, was an influential industrial pioneer in Los Angeles. Baker played a major role in stimulating growth in California, particularly through the production of streetcars, water distribution systems, and oil drilling products.

In the following years, the area surrounding Baker became the premier steel and iron manufacturing center in California. In addition, Baker was a major supplier to the United States military during World Wars I and II. Located on North Spring Street, Capitol Milling Company was one of Los Angeles' leading enterprises, specializing in milling grains to produce flour, cereal, and food. The nearby SPRR allowed Capitol Milling to transport products nationwide. Today, these buildings provide a window to Los Angeles' past and serve as symbols of the industries that allowed the city to grow.

The concentration of industry near the river fostered the growth of new immigrant communities, including vibrant Italian, Mexican, and Chinese districts. These communities introduced new cultural elements and helped to establish Los Angeles as a global city. In 1917, Santo Cambianica, an Italian immigrant, opened the San Antonio Winery near the Los Angeles River.

Lincoln Heights

As commercial and industrial activity grew downtown in the late nineteenth century, new arrivals to Los Angeles looked to adjacent land surrounding downtown as the setting for the City's first suburbs. Similar subdivisions were recorded concurrently in areas east, south, and north of Downtown. The community of Lincoln Heights was built on the higher plain southeast of the confluence of the river and Arroyo Seco, subdividing the former farmlands. This new community was linked to downtown Los Angeles along Downey Avenue and served by horse-

drawn streetcars. The main north-south road, San Fernando Road/Avenue 20, passed through Lincoln Heights and connected it to northern and southern California. Into the twentieth century, Lincoln Heights grew into a small town with a classic mix of residential neighborhoods around a small downtown located between Broadway and Five Points. At the same time, owing to its location as the mouth of a pass to the north, the first rail lines linking northern and southern California were built, paralleling the Los Angeles River. Along with the railroads came the first industrial uses, some directly rail-related in the form of rail yards, such as the Cornfield site, and some uses that were served by the rail. The residential small-town character of Lincoln Heights began to erode.

By the end of World War II, Lincoln Heights transformed into a predominantly working-class neighborhood. This transformation accelerated with the construction of the Golden State Freeway (I-5) in the 1950s, replacing the historic north-south Route 99 that used San Fernando Road and Avenue 20, split Lincoln Heights in half at its core and destroyed the neighborhood's important relationship with downtown, the river, and the historic origins of Los Angeles.

Railroads and Industry

After the rapid development of the 1920s, more and more industry began to locate in Lincoln Heights along the riverbanks following the railroad. Early land use districting ordinances had already established industrial use areas along the rail and river corridor, which were hardened further into discrete zones around 1920. The mixed-use character of Lincoln Heights with its residential neighborhoods was "pushed" to the east, with older neighborhoods nearer the river displaced by industrial lands.

Meanwhile, plagued by the river's unpredictability and constant flooding, the U.S. Army Corps of Engineers began to channelize the river in the 1930s. Ever since, the once natural resource has served as a flood control system and carried storm water and other runoff south to San Pedro and the harbor.

In 1996, one of the largest undeveloped parcels within the area was proposed to be developed as an industrial park but the surrounding neighborhoods resoundingly rejected the concept and instead demanded that the parcel, which was known as "the Cornfield," be set aside as a park. With the assistance of the Trust for Public Land, the State of California purchased the 33-acre property and is today developing conceptual plans to develop the Los Angeles State Historic Park. With the introduction of the Gold Line only a few short years later, in 2002, and subsequently the interest in the revitalization of the River and the Arroyo Seco, the stage was set for developer speculation and the pressure for residential conversion began.

Brief History of the Zanja System

As described in further detail in the following sections of this report, two extant segments of the Zanja Madre system occur in close proximity to the project site.

Spanish settlement of the area that is now Downtown Los Angeles began with the founding of the pueblo in 1781 and the arrival of eight families that began improving the land by erecting shelters and planting small agricultural plots. The inhabitants of the pueblo, or *pobladores*, directed the local Tongva to construct the Zanja Madre, or "Mother Ditch," to transport water between the Los Angeles River and the pueblo. Water transported via the Zanja Madre was utilized throughout the pueblo for irrigation and various domestic uses. The Zanja Madre originated near the modern North Broadway bridge and extended along the base of a bluff to the original Plaza. By 1818, the

population of the pueblo had grown to nearly 600. In the last quarter of the nineteenth century, Los Angeles experienced a period of intense growth sparked by the development of railroad lines to and from Los Angeles, forging connections between the city and the rest of Southern California. By this period, the city's water transportation system had been expanded to include the Zanja Madre and at least eight secondary ditches to distribute water throughout the city, constructed post-1855 (Gumprecht 2001).

By the late nineteenth century, there were a total of 19 zanja segments resulting in a zanja system of over 50 linear miles, including smaller ditches branching off of the Zanja Madre. Due to public concerns over the open zanja ditches exposing children to drownings, the city was forced to take action resulting in almost all of the zanja segments being enclosed either by concrete piping, or wooden flumes (Gumprecht 2001).

By 1900, the city's population had reached 102,000 people. As the city urbanized and land was subdivided, the need for irrigation waned; use of the zanja system declined and was mostly abandoned in 1906, with only small portions of zanjias used as part of the storm drain system (Gust and Parker 2004). Portions of the abandoned zanjias have been unearthed throughout the city.

4 Background Research

4.1 Methods

4.1.1 California Historical Resources Information System Records Search

On February 7, 2024, Rincon conducted a search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC), located on the campus of the California State University, Fullerton (**Appendix A**). The SCCIC is the official state repository for cultural resources records and reports for Los Angeles County. The purpose of the records search was to identify previously recorded cultural resources, as well as cultural resources studies that have been previously conducted within the project site and a 0.5-mile radius surrounding it to determine whether implementation of the project would have the potential to impact any known and unknown cultural resources.

4.1.2 Desktop Background Research

Rincon completed background research in support of this study throughout February and March 2024. The following inventories of were reviewed to confirm the presence of known cultural resources with the potential to be impacted by the proposed project: NRHP, City of Los Angeles HCMs and HPOZs, the California Office of Historic Preservation (OHP)'s Archaeological Determination of Eligibility List. As previously noted, the proposed project site is located in the CASP Area. However, it is also located in the Central City North Community Plan Area (CPA), which was surveyed for built environment resources by Historic Resources Group (HRG) for the City of Los Angeles in 2016. Therefore, the following survey reports were reviewed by Rincon to identify cultural resources and gain an understanding of the developmental history of the area surrounding the project site.

- *Historic Resources Survey – Cornfield Arroyo Seco Specific Plan Area City of Los Angeles, California* (LSA 2011),
- *Historic Resources Survey Report – Central City North Community Plan Area* (City of Los Angeles 2016)

Additionally, the following sources were reviewed to contextualize previous development and land use within the project site to determine previous ground disturbances, including the depths and nature of those previous disturbances, to help inform on the archaeological sensitivity of the project site.

- Phase I Environmental Site Assessment (ESA) prepared for the project site by Rincon in 2022 (Rincon 2022)
- *Soil Management, Implementation and Enforcement Plan: William Mead Homes Playground and Other Parcels - 1300 Cardinal Street Los Angeles, California* (SMIEP) (Bureau Veritas North America, Inc. [Bureau Veritas] 2012)

- *2018 Five-Year Remedial Action Review Report: William Mead Homes - 1300 Cardinal Street Los Angeles, California*. Prepared for Housing Authority of the City of Los Angeles. August 22, 2018 (Bureau Veritas 2018)

In addition to the reports listed above, Rincon reviewed a variety of sources including but not limited to, historical maps, aerial photographs, and written histories of the area. The following is a list of sources consulted in the preparation of this study, in addition to those noted in the References section of this report.

- 2001 map of the City of Los Angeles that overlays the Zanja Madre system as depicted in an 1884 map of the City of Los Angeles (Gumprecht 2001)
- Historical reporting on the irrigation systems of Southern California as documented in *Irrigation in California (Southern)* (Hall 1888)
- *Geotechnical Feasibility Investigation, Future Redevelopment of HACLA William Mead Homes, 1300 Cardinal Street, Los Angeles, California* (Geocon West, Inc. [Geocon] 2023)
- Historical aerial photographs accessed via Nationwide Environmental Title Research Online and University of California, Santa Barbara Library FrameFinder
- Historical United States Geological Survey topographic maps
- Sanborn Fire Insurance Company Maps accessed through the Los Angeles County Public Library

4.1.3 Sacred Lands File Search

Rincon contacted the NAHC on February 7, 2024, to request a search of the SLF, as well as a contact list of Native Americans culturally affiliated with the project area. The results of the SLF search are provided in **Appendix B**.

4.2 Findings

4.2.1 Known Cultural Resources Studies

The CHRIS records search identified 41 cultural resources studies that have been previously conducted within 0.5 mile of the project site (Appendix A). Of these studies, two (Study LA-05425 and LA-08521) include a portion of the project site. Collectively, these studies address approximately 80 percent of the project site and were completed within the last 10 years. The CHRIS record search also identified six studies (LA-06840, -02577, -02644, -10641, -10638, -04835) that include areas directly adjacent to the project site. Studies identified by the CHRIS records search that occurred within or adjacent to the project site are discussed in further detail below. Also presented below is a summary of the 2011 historic resources survey prepared in support of the CASP by LSA (LSA 2011).

Studies Conducted Within the Project Site

Study LA-05425

Study LA-05425, *Emergency Recovery Actions at CA-LAN-2828 (Primary Number 19-002828)*, Los Angeles, Los Angeles County, California, was prepared by Ronald M. Bissell and Sherri M. Gust for RMW Paleo Associates in January 2021. The study was prepared to document the unanticipated

discovery of a deposit of animal food bones and discarded tableware that were encountered during remedial soils removal that was occurring within the current project site in support of a then-ongoing project (described later herein as Resource P-19-002828). The study consisted of a field survey, site recordation, literature review, laboratory work and report preparation. The study indicated the identified site was encountered approximately 12 inches below the topsoil of the landscape area and likely represents the discards from a food service establishment serving construction workers during the building of the refineries that once occupied the area (circa 1894 through 1906). The study concluded that the site was not significant, as it has already yielded all of the data it was likely to contain. The study noted the site had been disturbed from its original point of disposition and that it likely extends under the existing urban environment within and outside the current project site (Bissell and Gust 2001). Recommendations within the report included the retention of a qualified archaeologist in the event additional deposits of the resource P-19-002828 be evaluated during construction activities.

LA-08521

Study LA-08521, *A Phase I Archaeological Study for the William Mead Homes Site (1300 N. Cardinal Street) Bounded by North Main Street, Elmyra Street, Leroy Street and the Spur Line, City of Los Angeles, County of Los Angeles, California*, was prepared by Robert J. Wlodarski in 2004. The study investigated approximately 75 percent of the current project site, north of Cardinal Street. It included an archaeological assessment and survey. No cultural resources were identified within the project site as a result of Study LA-08521 (Wlodarski 2004).

Historic Resources Survey – Cornfield Arroyo Seco Specific Plan Area

LSA Associates prepared a survey titled Historic Resources Area, Cornfield Arroyo Seco Specific Plan Area, in 2011. To inform future planning considerations in the Cornfield Arroyo Seco Specific Plan Area, which includes the entirety of the current project site, the study identified, documented, and evaluated, at the intensive level, selected properties for eligibility for the National Register, California Register, and HCM designation. Because the Project Area was subject to the 2011 historical resources inventory, it was excluded from the SurveyLA Central City North CPA or Northeast Los Angeles CPA survey areas, which the 2011 study area overlaps. However, consistent with the methodology of SurveyLA, the 2011 study identified individual resources, non-parcel resources, historic districts and multi-property resources, and planning districts. The 2011 survey identified 19 individual resources that were recommended eligible for the National Register, California Register, and HCM designation, and one property was recommended eligible for HCM designation alone. Two individual properties selected for the 2011 survey, including William Mead Homes, were previously determined eligible for listing in the National Register and listed in the California Register and were not reevaluated for historical significance as part of the survey. No resources aside from William Mead Homes were identified on the current project site. However, the 2011 study identified three designated or eligible located adjacent to the project site: Kelite Factory at 1250 North Main Street, California Steel and Cornice Company at 1611 Naud Street, and the Department of Water and Power Headquarters at 1630 North Main Street (LSA Associates 2011). The designated and eligible resources are discussed further below in Section 4.2.2 *Known Cultural Resources*.

Studies Conducted Adjacent to the Project Site

LA-06840

Study LA-06840, *Phase I Archaeological Survey - Former Alison Street MPG Site - Los Angeles California*, was prepared by Tetra Tech, Inc. in October 2003. Conducted in support of the environmental review process for a then-proposed project, the study consisted of a CHRIS records search at the SCCIC, a NAHC SLF search, and a pedestrian field survey of the Southern California Gas Company's former Aliso Street Mitigation and Restoration Program (MGP) Site. The former MGP site, which is approximately 52-acres in size, is located south of the railroad tracks by Bauchet Street, west of the Los Angeles River, north of West Temple Street and east of North Vignes Street, south of the current project site across the Union Pacific Railroad (UPRR) tracks. The CHRIS records search conducted for the study identified no prehistoric resources within a 0.5-mile of the project site. However, the search identified six historic period archaeological sites, one historic period isolated archaeological resource and many built environment resources, including several designated California Historical Landmarks and City of Los Angeles designated HCMs within the 0.5-mile records search area. The study noted that a review of historical maps indicated the historic-period presence of several dwellings, restaurants, and other improvements in the areas that had the potential to be unearthed during ground disturbing activities; however, no cultural resources were identified within the MPG site through the CHRIS records search, NAHC SLF search, or survey (Tetra Tech, Inc. 2003). No prehistoric or historic period resources were identified within the current project site as a result of Study LA-06840.

LA-02577

Study LA-02577, *Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California*, was prepared by Robert J. Wlodarski in 1992. The study was prepared in support of the Alameda Corridor Project's environmental review and consisted of archival and background research. The Alameda Corridor Project constructed a below grade freight rail line to connect the ports of Los Angeles and Long Beach. The project area associated with Study LA-02577's encompasses the Los Angeles River corridor, just east of the current project site, and extended south for many miles. The study concluded the project area was considered sensitive for cultural resources, including those of prehistoric and historic nature (Wlodarski 1992a). No prehistoric or historic period resources were identified within the current project site as a result of Study LA-02577.

LA-02644

Building on the results of the records search conducted as part of Study LA-02577 summarized above, Study LA-02644, *The Result of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California*, was prepared by Robert J Wlodarski in 1992. The study was prepared to determine if any cultural resources would be affected by the Alameda Corridor Project. The study identified two prehistoric sites and two historic period sites within the Alameda Corridor's study boundaries. None of the resources identified by Study LA-02644 are within the direct vicinity of the current project site. The study additionally performed an intensive-level reconnaissance level survey of the entirety of the proposed corridor and identified no surface evidence of archaeological resources (Wlodarski 1992b). No prehistoric or historic period resources were identified within the current project site as a result of Study LA-02644.

LA-10641

Study LA-10641, *Preliminary Historical/Archaeological Resources Study – San Bernardino Line Positive Train Control Project - Southern California Regional Rail Authority – Counties of Los Angeles and San Bernardino – CRM Tech Contract No. 2446*, was prepared by Shawn Gatchel-Evans in August 2010. The area of potential effects (APE) or study area associated with Study LA-10641 consists of roughly 56 miles of railroad right-of-way (ROW); Los Angeles Union Station (LAUS), which is located approximately 0.3 miles southwest of the current project site, is the northern terminus of the APE associated with Study LA-10641. The study identified several historic period resources within its APE (Gatchel-Evans 2010a). However, none of these resources are located in the vicinity of the current project site.

LA-10638

Study LA-10638, *Preliminary Historical/Archaeological Resources Study - Southern California Regional Rail Authority (SCRRA) – River Subdivision Positive Train Control Project – City of Los Angeles, Los Angeles County, California – CRM TECH Contract No. 2452*, was prepared by Shawn Gatchel-Evans in August 2010. The APE or study area associated with the study consists of roughly 11.5 miles of railroad ROW along the Los Angeles River. The scope of the study included a records search, preliminary historical background research, a reconnaissance survey of the APE, and communication with local Native American representatives. The study identified 16 previously recorded resources within or partially within its APE. Fourteen of the resources identified by the study are built environment resources and two are archaeological resources (Gatchel-Evans 2010b). Of the resources identified by Study LA-10638, the following are located within 0.5 mile of the current project site and were also identified by the CHRIS conducted for the current study: 19-001575 (historic and prehistoric archaeological site located below grade at LAUS, P-19-186112 (UPRR/SPRR), P-19-192484 (Macy Street Bridge), P-19-188246 (Department of Water & Power; General Services Headquarters Historic District), P-19-192483 (North Main Street Bridge). These resources are summarized in further detail below.

LA-04835

Study LA-04835, *Cultural Resources Inventory Report for Williams Communications, Inc – Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties, California*, was prepared by Jones & Stokes Associates, Inc. (Jones & Stokes) in 1999. The portion of the study area associated with Study LA-04835 in Los Angeles encompasses the North Main Street ROW located just north of the current project site. The study identified one resource in the vicinity of the current project site, the UPRR (P-19-186112) located adjacent, to the south, of the current project site (Jones & Stokes 1999) This resource was also identified by the CHRIS search conducted for the current study and is summarized in detail below.

4.2.2 Known Cultural Resources

The CHRIS records search identified 57 cultural resources that have been previously recorded within 0.5-mile of the project site. Previously recorded resources identified by the CHRIS records search are listed in Table 1. Of these resources, two (William Mead Homes and P-19-002828) are recorded as being within or encompassing the project site and four (P-19-186112, P-19-192235, P-19-188246, P-19-176368) are recorded as being adjacent to the project site. In general, archaeological resources (both prehistoric and historic period) and/or Native American burials identified within the project's

0.5-mile records search area were encountered from the surface to depths between 3.5 inches and 19 feet bgs.

In addition to the CHRIS records search, a review of the NRHP, City HCM list, and the City's website Historic Places LA, among other sources, identified five additional designated or eligible resources located within 1,000 feet of the project site which were not included in the records search results. Of these, three resources reflect the area's historically industrial character. These include the Kelite Factory at 1250 North Main Street, which is eligible for the NRHP, CRHR, and HCM designation as a good example of a 1920s industrial loft; the River Station Area, designated as HCM #82 due to its associations with the San Pedro Railroad; California Steel and Cornice Company at 1611 North Naud Street, which is eligible for the NRHP, CRHR, and HCM designation for its namesake firm's history of fabrication for the Case Study House program and the Standard Oil Company; and San Antonio Winery at 737 South Lamar Street, which is designated as HCM #42 as the last remaining winery in the city of Los Angeles (City of Los Angeles 2024b). In addition, the nearby Los Angeles River Channel has been determined eligible for listing in the NRHP.

In addition to the designated and eligible historical resources discussed above, there is one potential resource identified immediately adjacent to the project site, the mural *La Raza's Struggle for Freedom*. Created in 1983, the mural spans a section of masonry wall roughly between 201 and 299 East Leroy Street, facing the interior of the William Mead Homes complex. According to Historic Places LA, it has been identified as potentially eligible for designation, pending additional research (City of Los Angeles 2024b). Descriptions of the resources located adjacent to and within the project site are discussed in further detail below.

Table 1 Previously Recorded Resources Identified by the CHRIS Records Search

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-002828	CA-LAN-002828H	Historic Site	William Mead Homes Site 1; refuse deposit.	2000 (Ronald M. Bissell, RMW Paleo Associates)	Former NR Status Code 5: Ineligible for listing in the NRHP but still of local interest.	Within (southern portion, west of East Bloom Street)
P-19-186112		Historic Structure	UPRR, SPRR, Los Angeles Division	1999 (S. Ashkar, Jones & Stokes); 2002 (Rand F. Herbert, JPR Historical Consulting Services); 2009 (R. Ramirez and F. Smith, SWCA Environmental Consultants); 2009 (F. Smith and J. Steely, SWCA Environmental Consultants); 2012 (Alyssa Newcomb, SWCA Environmental Consultants); 2018 (Audrey von Ahrens, GPA); 2019 (Jenna Kachour, GPA)	CHR Status Code 6Y: Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing.	Adjacent
P-19-192235		Historic Site	Los Angeles County Sheriff's Men's Central Jail Property	2015 (Jeanette McKenna, McKenna et al.)	CHR Status Code 3CS: Appears eligible for listing in the CRHR as an individual property through survey evaluation.	Adjacent
P-19-188246		Historic Building	Mission Tower, Atchison, Topeka & Santa Fe Railway Interlocking Tower	2002 (A. Carlisle & K. Lain, Myra L Franck)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Adjacent

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-176368		Historic District	Department of Water & Power; General Services Headquarters Historic District	1994 (McAvoy, Christy J., Historic Resources Group); ESA 2019; 2022 (Monica Wilson, AECOM)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Adjacent
		Historic Building	Kelite Factory at 1250 North Main Street		CHR Status Code 3S,3CS, 5S3: Appears eligible for listing in the NRHP, CRHR, and for local listing or designation as an individual property through survey evaluation.	Adjacent
P-19-001575	CA-LAN-001575/H	Prehistoric and Historic Site	Historic components: structural features (e.g., refuse deposits, privies, wells, foundations for brothels, Chinese cribs, and historic period dog burial), segment of the zanja system, and artifacts/ecofacts, including cultural materials associated with Chinatown dating circa 1860-1930s. Prehistoric components: Native American cremations, partial human remains, and associated grave goods. Noted to be associated with Gabrieleño village of <i>Yaanga</i> .	1989 (John M. Foster, Greenwood & Associates); 2000 (M. Horne, K. Warren, Applied Earthworks); 2004 (Warren, Applied Earthworks); 2020 (S. Gordonstein, Applied Earthworks); 2022 (K. Warren, Applied Earthworks, Inc)	Not evaluated	Outside, approximately 2,500 feet (762 meters) southwest
P-19-003100	CA-LAN-003100H	Historic Site	Artifact scatter possibly associated with the SPRR Company's River Station Pacific Depot and hotel.	2002 (A. Wesson, URS Corporation)	Not evaluated	Outside, approximately 1,500 feet (457 meters) north/northeast
P-19-003101	CA-LAN-003101H	Historic Site	Artifact scatter possibly associated with the SPRR	2002 (A. Wesson, URS)	Not evaluated	Outside, approximately

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Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
			Company's River Station Pacific Depot and hotel.			1,500 feet (457 meters) north/northeast
P-19-003102	CA-LAN-003102H	Historic Site	Structural features consisting of brick wall and foundation and ceramic and glass bottle fragments.	2002 (A. Wesson, URS)	Not evaluated	Outside, approximately 1,400 feet (426 meters) northwest
P-19-003103	CA-LAN-003103H	Protohistoric/ Historic site	Two segments of the Zanja Madre (water conveyance feature).	2002 (A. Wesson, URS); 2011 (Heather Gibson, AECOM); 2014 (L. Furnis, Cogstone); 2014 (Carren Jao, KCET)	Appears eligible for NRHP listing	Outside; One segment approximately 1260 feet (384 meters) west; second segment approximately 1,500 feet (457 meters) northwest.
P-19-003120	CA-LAN-003120H	Historic Site	Los Angeles State Historic Park/River Station Area/SPRR; Cornfield/River Station. The site consists of brick-and-mortar foundations, brick-and-mortar piers, concrete footings, railroad tracks and ties, and artifacts associated with the SPRR Yard.	2003 (Peter Messick, Greenwood & Assoc.); 2010 (Michael Sampson and Mary Garrett, State of Calif., Dept of Parks & Rec.)	Designated City of Los Angeles Historical Cultural Monument No. 82; No record of NRHP or CRHR evaluation.	Outside; the southern boundary of the site is approximately 905 feet (275 meters) northwest
P-19-003181	CA-LAN-003181H	Historic Site	Concrete slab foundations associated with the J. M. Griffith Co. Planning Mill and Lumber Yard and domestic refuse.	2004 (Alice Hale, Greenwood & Associates)	Not evaluated	Outside, approximately 1750 feet (533 meters) southwest

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-003650	CA-LAN-003650H	Historic Site	Reworked deposit of Bovinae Cranial fragments (not found in situ) believed to be associated with the Sonora Town of Los Angeles, where bull fights were purported to take place.	2005 (Leann Moore, Cogstone Resource Management)	Not evaluated	Outside, approximately 1500 feet (457 meters) northwest
P-19-004182	CA-LAN-004182H	Historic Site	North Spring Street track remnant consisting of a single alignment (north-south) of railroad ties.	2011 (John M. Foster, Greenwood & Associates)	Not evaluated	Outside, approximately 1600 feet (487 meters) northeast
P-19-004183	CA-LAN-004183H	Historic Site	A 655-foot-long east-west segment of the College Street pavement consisting of paving stones described as irregularly sized and hand-chiseled and made of granite.	2011 (John M. Foster, Greenwood & Associates)	Not evaluated	Outside, approximately 885 feet (269 meters) southwest
P-19-004200	CA-LAN-004200H	Historic Site	Brick pavement representing historic Alameda Street. Several railway segments were identified in proximity to the pavement, including a segment of the SPRR spur and appear to be contemporaneous with the brick pavement.	2007 (Adela L. Amaral, AECOM)	Appears eligible for CRHR	Outside, approximately 1760 feet (536 meters) west/southwest

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Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-004201	CA-LAN-004201H	Historic Site	Naud's Junction consists of five features with cultural constituents and 249 artifacts not associated with identified features. Features include rectangular building foundations or walls, a wooden box or trough, a circular brick and cement manhole, and an oval brick structure and associated linear brick segment.	2007 (Adela L. Amaral, AECOM)	Not evaluated	Outside, approximately 1830 feet (557 meters) southwest
P-19-004202	CA-LAN-004202H	Historic Site	North Alameda Street railroad tracks are likely associated with SPRR. Four segments of rail lines were identified	2007 (Adela L. Amaral, AECOM)	Not evaluated	Outside, approximately 1830 feet (557 meters) southwest
P-19-004601	CA-LAN-004601H	Historic Site	The site consists of 26 features, including a segment of the Zanja Madre and its associated builder's trench. The remaining 24 features consist of 20 building foundations and four refuse clusters. More than 2000 artifacts were identified during the construction monitoring activities, including glass, ceramic, faunal remains, building hardware, leather, shell, and stone objects to name a few.	2014 (L. Furnis, E. Nocolay, N. Rogers, M. Wiseman, Cogstone Resources Management)	Not evaluated	Outside, approximately 1250 feet (381 meters) west

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-004648	CA-LAN-004648H	Historic Site	The site consists of a utility pole base constructed of wood, with two associated artifacts consisting of one glass electrical insulator and one brick with mortar.	2015 (Reily Murphy, AECOM)	Not evaluated	Outside, approximately 1454 feet (443 meters) southwest
P-19-004649	CA-LAN-004649H	Historic Site	The site consists of a concrete basement and five historic artifacts consisting of glass, faunal, ceramic, and structural materials were also identified.	2012 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 2030 feet (618 meters) southwest
P-19-004650	CA-LAN-004650H	Historic Site	The site consists of a refuse deposit with household and railroad hardware items.	2012 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 2030 feet (618 meters) southwest
P-19-004651	CA-LAN-004651H	Historic Site	The site consists of a household refuse deposit.	2012 (Reily Murphy, AECOM)	Not evaluated	Outside, approximately 2030 feet (618 meters) southwest
P-19-004652	CA-LAN-004652H	Historic Site	The site consists of two features comprised of a concrete walled structure that may be a basement and two associated artifacts and a brick wall and cement foundation/floor with associated artifacts.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 2030 feet (618 meters) southwest
P-19-004653	CA-LAN-004653H	Historic Site	The site consists of a household refuse deposit.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 2122 feet (646 meters) southwest

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Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-004654	CA-LAN-004654H	Historic Site	The site consists of a household refuse deposit.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 1994 feet (607 meters) south/southwest
P-19-004655	CA-LAN-004655H	Historic Site	The site consists of 13 isolated artifacts scattered.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 1994 feet (607 meters) south/southwest
P-19-004656	CA-LAN-004656H	Historic Site	The site consists of two features comprised of two brick walls and 76 associated artifacts and three parallel brick alignments or wall-stubs.	2012 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 1994 feet (607 meters) south/southwest
P-19-004657	CA-LAN-004657H	Historic Site	The site consists of a household refuse deposit.	2012 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 1712 feet (521 meters) south/southwest
P-19-004658	CA-LAN-004658H	Historic Site	The site consists of three features comprised of a series of subsurface concrete vaults, a set of pipes and pipe fittings, and the remains of a natural gas holder and associated walls and settling basins. Seven cultural constituents not associated with any of these features were also identified.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 2160 feet (658 meters) south/southwest

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-004659	CA-LAN-004659H	Historic Site	The site consists of two features comprised of three brick manholes with 13 associated artifacts, a truncated segment of a vitrified ceramic sewer pipe, and one isolated artifact not associated with the features.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 1635 feet (498 meters) south/southwest
P-19-004660	CA-LAN-004660H	Historic Site	The site consists of paving stones and railroad/streetcar tracks, and one associated railroad and two isolated artifacts.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 2190 feet (667 meters) south/southwest
P-19-004661	CA-LAN-004661H	Historic Site	The site consists of a brick wall segment associated with the Cudahy Packing Company.	2014 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 2396 feet (730 meters) south
P-19-004662	CA-LAN-004662	Prehistoric Isolate	Permineralized human femur.	2013 (Frank Humphries, AECOM)	Not evaluated	Outside, approximately 1,550 feet (473 meters) southwest
P-19-100881	CA-LAN-001575/H	Historic Isolate	One metal fastener and two miscellaneous building material fragments.	2009 (K. Richardson, M. Phil, ArchaeoPaleo Resource Management)	Not evaluated	Outside, approximately 1,715 feet (533 meters) northeast
P-19-190309		Historic Site	Zanja Madre nomination form for a 75-foot segment.	2008 (Christeen Taniguchi, Galvin Preservation Associates); 2014 (Carren Jao, KCET)	Needs re-evaluation for listing in the NRHP or CRHR	Outside, approximately 1500 feet (457 meters) northwest

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Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-174919		Historic Site	Plaque commemorating site of Portola Trail Campsite #1 associated with diary entry of Crespi for August 2, 1769.	1980 (J. Arbuckle)	Designated California Historical Landmark No. 655; approved September 26, 1958, by State Park Commission	Outside, approximately 2,330 feet (712 meters) northeast
		Historic Structure	Los Angeles River Channel		CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	200 feet southeast
		Historic Building	California Steel and Cornice Company Building at 1611 North Naud Street		CHR Status Code 3S,3CS, 5S3: Appears eligible for listing in the NRHP, CRHR, and for local listing or designation as an individual property through survey evaluation.	890 feet to the northeast
		Historic Site	River Station Area at 1231 North Spring Street		CHR Status Code 5S1: Individually listed or designated locally (HCM #82)	900 feet to the northwest
		Historic Building	San Antonio Winery at 738-744 Gibbons Street and 725-749 Lamar Street		CHR Status Code 5S1: Individually listed or designated locally (HCM #42)	930 feet to the east
P-19-150244		Historic-period Building	Two story brick industrial building at 1709 North Spring Street	2002 (Herbert, Rand, JRP Historical Consulting Services)	No CHR Status Code applied; Recommended ineligible for listing in the NRHP and CRHR	Outside
P-19-150245		Historic Building	One story circa 1894 building at 1701 North Spring Street	2002 (Herbert, Rand, JRP Historical Consulting Services)	No CHR Status Code applied; Recommended ineligible for listing in the NRHP and CRHR	Outside
P-19-150246		Historic Building	Triangular, two-story, circa 1890 industrial building at 1635-1639 North Spring Street; New York Suspender Factory	2002 (Herbert, Rand, JRP Historical Consulting Services)	No CHR Status Code applied; Recommended ineligible for listing in the NRHP and CRHR	Outside

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-150329		Historic Buildings (2)	Phillip Fritz Residence; Samuel M Storer Residence at 411 and 415 Bernard Street	1982 (Roger G. Hatheway, Hatheway & Associates); 1995 (D.N. Slawson, Greenwood & Associates)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Outside
P-19-167098		Historic Building	San Antonio Winery at 737 Lamar Street	1974 (Tom Sitton, Natural History Museum)	Not evaluated	Outside
P-19-170901		Historic District	Chinatown District (East of Hill Street)	1982 (R. Hatheway, R.G. Hatheway & Associates)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Outside
P-19-170949		Historic District	Chinatown District (West of Hill St)	1982 (R. Hatheway, R. G. Hatheway & Associates)	CHR Status Code 7R: Identified in Reconnaissance Level Survey: Not evaluated.	Outside
P-19-170956		Historic Building	Charles B. Wellman Residence at 437 Savoy Street	1982 (Roger G. Hatheway, Hatheway & Associates)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Outside
P-19-170957		Historic Building	Capitol Milling Company Building at 1231 North Spring Street	1974 (T. Sitton, Natural History Museum); 1982 (Hatheway, Roger, R. G. Hatheway)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Outside
P-19-170973		Historic Building	Los Angeles Terminal Annex Post Office at 900 North Alameda Street	1982 (T. Jacques, S. Carrico, Westec Services); 1984 (D. Robertson, Beland Associates)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus	Outside

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
					through Section 106 process. Listed in the CRHR.	
P-19-171574		Historic Building	Chevron Station at 901 North Alameda Street	1981	CHR Status Code 7R: Identified in Reconnaissance Level Survey: Not evaluated.	Outside
P-19-186110		Historic Structure	UPRR, Hobart Tower	1999 (S. Ashkar, Jones & Stokes); 2002 (D. Livingstone and C. Hamilton, Applied Earthworks); 2007 (Francesca G. Smith and Caprice D. Harper, Parsons); 2018 (Jessica B. Feldman, ICF); 2019 (Jenna Kachour, GPA)	CHR Status Code 5D2: Contributor to a district that is eligible for local listing or designation.	Outside
P-19-186721		Historic Building	ATA BOY Inc. Building at 1640-1646 North Spring Street	2002 (D. Slawson, Greenwood & Associates)	CHR status Code 3S,3CS, 5S3: Appears eligible for listing in the NRHP, CRHR, and for local listening or designation as an individual property through survey evaluation.	Outside
P-19-187085		Historic Structure	The Mojave Road	1989 (S. Elder); 2014 (Marc Beherec, AECOM)	Designated California Historical Landmark No. 963	Outside
P-19-188007		Historic Structure	Old San Fernando Road	2006 (J. McKenna, McKenna et al); 2011 (C. Ehringer, ESA)	CHR Status Code 3S: Appears eligible for listing in the NRHP as an individual property through survey evaluation.	Outside
P-19-191149		Historic Building	Agricultural Chemical Company	2011 (Peter Moruzzi, ICF International)	CHR Status Code 6Y: Determined ineligible for listing in the NRHP by consensus through Section 106 process; Not evaluated for listing in the CRHR or local listing.	Outside

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-192470		Historic Building	Basso Auto Building at 1201 North Broadway	2017 (Amanda Kainer, ESA)	CHR Status Code 6Z: Found ineligible for NR, CR or Local designation through survey evaluation.	Outside
P-19-192482		Historic Structure	Bridge #53C-859; N Spring St Bridge; Spring St Bridge	Portia Lee	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Outside
P-19-192483		Historic Structure	Bridge #53C-1010; N Main St Bridge; Main St Bridge	2000 (Elizabeth Watson)	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Outside
P-19-192484		Historic Structure	Bridge #53C-130; Cesar Chavez Avenue Bridge; Macy St Bridge; Macy St Viaduct	Elizabeth Watson	CHR Status Code 2S2: Individual property determined eligible for listing in the NRHP by a consensus through Section 106 process. Listed in the CRHR.	Outside
Source: SCCIC 2024						

Resources Within the Project Site

William Mead Homes (1300 Cardinal Street)

William Mead Homes was first recorded and evaluated for historical significance in 2002, when HRG documented the property as part of the *City of Los Angeles Section 106 Review*. The 2002 record describes the resource as a public housing complex consisting of 24 apartment buildings and a community building constructed as a Modern-style garden apartment property. As a result of the 2002 evaluation, William Mead Homes was recommended eligible as a historic district under NRHP Criterion A “for its association with the development of public and defense worker housing in Los Angeles during the Second World War and under NRHP Criterion C as a Los Angeles public housing development based on the planning and design principles of the Garden City and Modern movements” (HRG 2002). Its period of significance begins in 1943 with the completion of the complex and concludes in 1952, though no explicit rationale is provided for the period of significance. Character-defining features of the district that embody the principles of Garden City planning and Modern architecture include superblock spatial organization and orientation of buildings, low massing of up to three stories in height, and Modern architectural characteristics, such as including the “standardization and repetition of building types” (HRG 2002). The district is generally bounded by North Main Street on the north, East Emyra Street and private property on the west, Leroy Street on the east, and Bolera Land and the UPRR ROW on the south, excluding the Ann Street School, located at the north end of the district.

On March 3, 2002, the California State Historic Preservation Officer concurred with the 2002 recommendation (DOE-19-02-0322-0000). As a result, the property was automatically listed in the CRHR.

Three subsequent recordations confirmed the continued eligibility of the William Mead Home property for the NRHP and CRHR. In 2011, Kathryn McGee revisited the property in 2011 in support of the *Historic Resources Survey of the Cornfield Arroyo Seco Specific Plan*, concluding the property retained integrity. The DPR forms prepared in 2011 list status codes of 2S2, 3CS (appears individually through survey evaluation), and 5S3 (Appears to be individually eligible for local listing or designation through survey evaluation, McGee 2011).

In 2016, Daniel Paul revisited the property as part of the *Link US Historical Resources Evaluation Report*. It was confirmed the property remained eligible for inclusion in NRHP, as recommended in 2002 (Paul 2016).

In 2017, Amanda Duane of GPA Consulting revisited the property, recommending the property remained eligible under NRHP Criteria A and C and CRHR Criteria 1 and 3 and that the previous 2S2 status code was still applicable (Duane 2017). The 2017 recordation described the district’s character-defining features as follows:

The character-defining features of the property include the overall site layout, particularly the diagonal axis that helped to ensure each unit got optimal sunlight and the communal grassy areas surrounding each building. The buildings themselves are characterized by their two-story height, flat roofs, emphasis on horizontality, regular fenestration, and red brick cladding.

Resource P-19-002828

Resource P-19-002828 was recorded by Ronald M. Bissell in 2021 as part of the previously described study, *Emergency Recovery Actions at CA-LAN-2828 (Primary Number 19-002828), Los Angeles, Los*

Angeles County, California (LA-05425). On the associated DPR forms, the site is described as being “six inches deep and confined to a thin stratum (approximately 6 inches thick) that is below about 12 inches of material deposited later” (Bissell 2000). The site is further described as being composed of approximately 400 bones of food animal species (beef, mutton, pork, and chicken), along with shellfish fragments, sherds of whiteware, fragments of stemmed glassware and metal fragments (Bissell 2000). The DPR asserts that the collected material likely constitutes discards from a cafeteria operated on the site in the early 20th century. According to the included map, the site is located in the Southern portion of the current project site, west of East Bloom Street, and likely extends beneath the existing urban environment (Bissell 2000). The site was assigned a California Office of Historic Preservation status code of 5, which indicates that the resource is considered historically significant by a local government but is ineligible for the NRHP (Bissell 2000). As previously discussed in Section 5.1.1, the associated report, LA-05425, was prepared in January 2021. The study concluded that the resource P-19-002828 was not significant under CEQA or the National Historic Preservation Act (NHPA), as it has already yielded all of the data it is likely to contain. Nevertheless, the report recommended that a qualified archaeologist be immediately contacted to evaluate any additional deposits associated with P-19-002828 during construction activities.

Resources Adjacent to the Project Site

P-19-186112

Resource P-19-186112 is the UPRR/SPRR, Los Angeles Division, portions of which are adjacent to the south of the current project site. In 1999, S. Ashkar recorded the resource in support of the *Cultural Resources Inventory for the Williams Communication Fiber Optic Alignment Between Los Angeles and Riverside, Los Angeles and Riverside Counties, California*. The 1999 recordation concerns multiple rail alignments in Los Angeles and Riverside counties originally operated by other railroad companies but ultimately acquired by Union Pacific. The 1999 record recommends the railroad system eligible under NRHP Criterion A for associations with the Transcontinental Railroad and the growth and economic development of the Los Angeles regions. Under NRHP Criterion B it is recommended eligible for associations with the “Big Four” of Mark Hopkins, Collis P. Huntington, Leland Stanford, and Charls Crocker. The period of significance is “1869 to present” (Ashkar 1999).

There have been five additional recordations of segments of the UPRR/SPRR, Los Angeles Division since the 1999 evaluation, which offer conflicting findings on the resource’s eligibility status. In 2002, Rand F. Herbert recorded and evaluated the Southern Pacific Los Angeles Division, San Gabriel-Pomona for “Grade Separations within the Alameda Corridor-East Project.” Herbert recommended the 26-mile segment, which is located well outside the records search radius for the current report, was historically significant under NRHP Criterion A, but lacked sufficient integrity to its potential period of significance, 1877 to 1885 (Herbert 2002). In 2009, R. Ramirez and F. Smith recorded a 0.38-mile segment of the UPRR for the *Historic Property Survey Report, Nogales Street Grade Separation and Gale Avenue/Walnut Drive Widening Project* in the City of Industry. Despite its historical significance Under NRHP Criterion A and CRHR Criterion 1, the subject segment, which is located outside the current project’s search radius, was recommended ineligible, due to a lack of integrity (Ramirez and Smith 2009). Also in 2009, F. Smith and J. Steely recorded a 2.2-mile segment of the UPRR in the cities of Alhambra, San Gabriel, and Rosemead for the *Historical Resources Evaluation Report for the San Gabriel Trench Project*. The segment, which is located outside the current study’s records search radius, was recommended ineligible for the NRHP and CRHR under all criteria due to a lack of historical and engineering significance (Smith and Steely 2009). From 2012 to 2017, Alyssa Newcomb recorded the SPRR as part of *More than a Mission: From Toviscanga to*

San Gabriel, Archaeological Monitoring for the San Gabriel Trench Project. For the purposes of the 2012 to 2017 recordation, the resource consisted of a 2.7-mile segment of the SPRR corridor, including several built environment and other historical archaeological features, located in San Gabriel, outside the records search radius for the current study. The 2017 record did not evaluate the resource for historical significance (Newcomb 2017). In 2018, Audrey von Aherns recorded and evaluated six segments the SPRR, Los Angeles Division/UPRR as part of the *Historical Resources Evaluation Report for the I-605 Corridor Improvement Project PA/ED*. Von Ahern found that the resource possessed significance under NRHP and CRHR Criterion A/1 but lacked integrity to convey that significance (von Ahern 2018). In 2019, Jenna Kachour completed an update of the UPRR. Kachour summarizes some of the previous evaluations of the property, in addition to relevant correspondence by the State Historic Preservation Officer (SHPO), dated July 11, 219. As summarized by Kachour, the SHPO did not concur with Ahern's recommendation that the segment of the railroad recorded in 2018 was ineligible and "recommended that the UPRR (P-19-186112) as a whole should be assumed eligible for the National Register of Historic Places for purposes of the I-605 Corridor Improvement Project only" (Kachour 2019).

P-19-192235

Resource P-19-192235 is the Los Angeles County Men's Central Jail, located at 441 Bauchet Street, outside the current project site. In 2015, Jeanette A. McKenna evaluated the resource in support of *A Cultural Resources Investigation of the Los Angeles County Men's Central Jail Complex at 441 Bauchet Street, Los Angeles*. As recorded in 2015, the resource is a correctional facility consisting of 11 buildings and structures. The 2014 evaluation does not provide a former evaluation of eligibility; However, the record's reviewers comments indicate the "site is sensitive for archeological resources," and the forms show the applicable NRHP eligibility criterion is D (significant for the potential to yield data), and the resource was assigned an OHP status code of 3CS, meaning it has been recommended eligible for the CRHR individually through survey evaluation (McKenna 2015).

P-19-188246

Resource P-19-188246 is the Mission Tower/AT&SF Tower, a railroad interlocking tower located at 1436 Alhambra Avenue, adjacent to the south of the current project site. In 2003, Alma Carlisle and Katie Lain evaluated the resource in support of the *Los Angeles Union Station Run-Through Track Project, Federal Railroad Administration and Caltrans Historic Properties Survey Report*. The resource was recommended eligible for the NRHP and CRHR under Criterion A/1 due to its associations with the Santa Fe Railroad and Union Station, Los Angeles, and under Criterion C/3 as a good example of a railroad switching tower constructed in the Spanish Colonial Revival style. Its period of significance is 1938, the year in which the tower was enlarged to its present size (Carlisle and Laine 2003). An attached 2004 letter from Knox Mellon, then the SHPO, concurred with the finding that the tower was eligible for the NRHP under Criteria A and C (Mellon 2004).

P-19-176368

Resource P-19-176368 is the Department of Water & Power; General Services Headquarters Historic District, located adjacent to the current project site, at 1630 North Main Street. In 1994, Christy J. McAvoy of HRG recorded and evaluated the historic district in support of Section 106 review for the 1994 Northridge Earthquake Project Review. Per the 1994 record, the district consisted of a campus of 11 buildings constructed between 1923 and 1973 to support the operations of the Department of Water and Power. Buildings were constructed in classically inspired Art Deco-influenced styles. The district was recommended eligible for the NRHP under Criteria A and B. Under Criterion A, the

district is significant for its association with the production and distribution of electrical power in Los Angeles, while under Criterion B, the district possesses significant associations with Ezra F. Scattergood, who served as the City's chief electrical engineer for 31 years. Its period of significance is 1923 to 1924. The district is contained on the triangular block bounded on the north by North Main Street, on the west by Leroy Street, and on the southeast by the UPRR ROW, though the boundaries excluded the far east and west ends of the block. Seven of the 11 buildings located within the district boundaries are considered contributing elements (McAvoy 1994).

In 2019, ESA resurveyed the district. While research conducted by ESA revised the construction dates of several of the buildings within the district, the field survey found there were no alterations to the district since 1994 recordation that would change district's integrity or eligibility (ESA 2019).

1250 North Main Street, Kelite Factory

In 2011, Kathryn McGee recorded 1250 North Main Street, the Kelite Factory (constructed in 1924), in support of the *Historic Resources Survey of the Cornfield Arroyo Seco Specific Plan*. The 2011 record describes the resource as a three-story, Art Deco-style industrial building, and recommended the property eligible for the NRHP, CRHR, and HCM designation under Criterion C/3/3 as "an excellent example of an industrial loft" (LSA 2011). The resource is located immediately adjacent to the west of the project site.

The Zanja System and the Project Site

According to the available Sanborn Fire Insurance maps and Gumprecht's map (2001) which traces the zanja system on H. J. Stevenson's 1884 map of the City of Los Angeles, there are two segments of the zanja system that are in close proximity to the project site and include the Zanja Madre and Zanja No. 6-1. While segments of the Zanja Madre have been found outside and north of the project site. Confirmed segments of the Zanja Madre were documented north of the project site near the intersections of North Broadway and Bishops Road and west of the project site near the intersection of North Broadway and College Street, channeling into and out of the Capital Mills building, bisecting the building from north to south.

Based on the sources consulted, the zanja segment mapped nearest the project site is Zanja No. 6-1. A review of the archaeological record indicates that no segments of Zanja 6-1 have been identified within the project site or 0.5-mile records search radius. In an effort to approximate the location of Zanja No. 6-1 in relation to the project site, other sources were consulted. State Engineer, William Hamilton Hall, reported on the irrigation systems in Southern California, which provides insight on the zanja network, including information pertaining to each zanja branch such as the character (form of construction), dimension, location, Hall's remarks, and the length of each zanja branch that makes up the zanja system (Hall 1888). A review of data documented in Hall's book for Zanja No. 6-1 provided the following information:

- Zanja No. 6-1 branches from the head of the Zanja Madre (northeast and outside of the project site).
- The segment of Zanja No. 6-1 that crosses Downie Avenue (present-day North Spring Street) was constructed of cement pipe, measuring 30 inches in diameter and 1,200 feet in length.
- The portion that crossed Ann Street was constructed of wrought iron pipe, measured 30 inches in diameter and was 1,900 feet in length.
- Zanja No. 6-1 then drops 10 feet in elevation and water is transported via a power system.

- The segment is noted to travel towards the Stearns Mills business (no longer extant) that was historically west of the project site. This segment measured 30 inches in diameter and was 1,500 feet in length.
- The segment is then noted to be an open ditch and flume that was 1,700 feet in length.
- The segment then traveled across Macy Street (present-day Cesar Chavez Avenue) as a cement pipe measuring 30 inches in diameter for a length of 400 feet.
- The segment is then noted to cross Aliso Street (present-day North Vignes Street) as a wrought iron pipe measuring 30 inches in diameter and 1,500 feet in length with a drop of 8 feet in elevation as it continued its course, requiring transport via a power system.
- Zanja No. 6-1 is noted to be an open ditch as it continued southward towards its terminus at First Street.

A review of Sanborn maps depicts Zanja No. 6-1 outside of the project site (see Section 4.2.3 below for detailed observations).

4.2.3 Historical Maps and Aerial Imagery Review

The following review of historical records, including aerial photographs (AP), topographic maps, and Sanborn Fire Insurance maps (Sanborn), is detailed in the Phase I ESA prepared by Rincon (Rincon 2022). A review of relevant observations, as documented in the Phase I ESA for the project site and Zanja No. 6-1, is included in Table 2 below.

Table 2 Historical Use of the Project Site and Information on Zanja No. 6-1

Year	Description	Source
1888	<p>This map year shows the following: the northwesternmost portion of the project site is depicted, showing the southeast intersection of East Elmyra Street and North Main Street. There is a one-story dwelling depicted within the location of present-day Building 2 or 3 of the William Mead Homes.</p> <p>A segment of Zanja No. 6-1 is depicted outside of the project site, extending from a parcel northwest/west of the project site, near the northwest intersection of North Main Street and Railroad Street (alleyway south of present-day Llewellyn Street). Zanja No. 6 is shown to extend south towards North Main Street as it travels in a southwesterly direction, crossing San Fernando Street (present-day East Rondout Street), then traveling southeast along Date Street (present-day East College Street), west of the “H. H. Conklin’s Foundry” and “Stearns MFG Co. Iron & Woodwork & Machine Shop”, as it crosses Mission Street (present-day North Alhambra Avenue), west of the “Los Angeles Oil Burning & Supply Co.”</p>	Sanborn
1890	<p>This map year shows the following: multiple one-story dwellings; stables and sheds; a hay, grain, wood, coal, and cattle sale yard; a blacksmith shop and wagon; and a “C.S. & A.P. Transfer Co.” business with a truck shed. The southwest portion of the project site is not depicted. No depiction of Zanja No. 6-1 is shown within or immediately adjacent to the Project site.</p>	Sanborn
1894	<p>This map year shows the following: multiple one-story dwellings; stables and sheds; a blacksmith and wagon shop; a windmill/water tank; and a cigar factory.</p> <p>Railroad tracks are depicted outside of the Project site, to the west and south of the, along San Fernando Street (present-day East Rondout Street) and Alhambra Avenue.</p> <p>A segment of Zanja No. 6-1 is depicted outside of the project site along Date Street (present-day East College Street), west of “Morris & Jones Wood Yard” and the “Los Angeles Oil Burning & Supply Co.”. The mapped segment is depicted from Alhambra Avenue, extending southward beyond the street limits of Date Street, as it extends between two, two-story dwellings. Also depicted are two culverts overlying the zanja segment (both along Date Street).</p>	Sanborn
1894	<p>This map year shows the following: vacant land within the southern portion of the Project site; several structures; and three light duty roads traversing the Project site, which appear to be consistent with the layout of present-day East Elmyra Street, East Ann Street, East Bloom Street, and Magdelana Street; however, one roadway that travels roughly east-west within the northeast quadrant of the project site does not appear to align with any present-day roads or the Sanborn map from the same year. There is an east-west railroad track depicted intersecting the southern portion of the Project site.</p> <p>The Los Angeles River to the east and southeast does not appear to be channelized and there are railroad tracks that are depicted paralleling the river to the west and east.</p>	TM
1896	Similar mapped features depicted in the 1894 topographic map.	TM
1900	Similar mapped features depicted in the 1896 topographic map.	TM

Year	Description	Source
1906	<p>This map year shows the following: multiple one-story dwellings; stables and sheds; stores; a bicycle repairing shop; a hay storage building; a restaurant; a blacksmith and wagon shop; a cobbler; a print shop; a church; Amalgamated Oil Co. with two 35,000-barrel oil tanks (on ground); Southern Refining Co. with multiple oil tanks (on ground); an oil storage building; a warehouse adjacent to the southern adjacent railroad tracks, and other associated buildings/structures.</p> <p>Railroad tracks associated with the SPRR are depicted outside of the Project site, to the west and south of the, along San Fernando Street (present-day East Rondout Street) and Alhambra Avenue. A sidetrack is depicted just west of East Elmyra Street, crossing four parcels, and connecting with various businesses.</p> <p>North and outside of the Project site, a segment of Zanja No. 6-1 documented in historical records as a wrought iron pipe as it crosses Ann Street, is depicted along San Fernando (present-day North Spring Street), noted in the map as “Iron Viaduct” and “Not Used.”</p>	Sanborn
1928	<p>This map year shows the following: several structures; one large unknown use structure within the southwest quadrant of the Project site, east of East Bloom Street; three single-track railroads spurs along the southwestern boundary of the Project site; two tanks in the southeast portion of the Project site; and several roads traversing the Project site, which appear to be consistent with the layout of present-day East Elmyra Street, East Ann Street, East Bloom Street, and Magdalena Street.</p>	TM
1928	<p>This aerial shows the following: several residential and commercial structures; one large unknown use structure within the southwest quadrant of the Project site; three roads traversing the subject property (Madelena Street, East Ann Street, and East Bloom Street; and vacant land within the southwestern portion of the Project site.</p>	AP
1938	<p>This aerial shows the following: similar features captured in the 1928 aerial photograph; however, the large unknown use structure within the southwest quadrant of the project site is no longer present and the area is shown as vacant land.</p>	AP
1948	<p>This aerial shows the following: several multi-family residential structures and appears consistent with the present-day configuration of the William Mead Homes; four roads traversing the subject property (Madelena Street, East Ann Street, Cardinal Street, and East Bloom Street; and vacant land within the southwestern portion of the Project site.</p>	AP
1950	<p>This map year shows the following: multiple one- and two-story dwellings/apartments in their present-day configuration (William Mead Homes, “Federal Housing Project”); a store; a display manufacturing building; a gas & oil station (1416 N Main); a mattress and box springs manufacturing building; a community building with a workshop; and a playing field in the southwestern corner. Cardinal Street is depicted bisecting the Project site, consistent with its present-day layout.</p> <p>There is an increase in SPRR tracks outside the Project site, to the west and south.</p> <p>North and outside of the Project site, a segment of Zanja No. 6-1 documented in historical records as a wrought iron pipe as it crosses Ann Street, is depicted along San Fernando (present-day North Spring Street), noted in the map as “Iron Viaduct” and “Not Used.”</p>	Sanborn
1952	<p>Similar features captured in the 1948 aerial photograph.</p>	AP

Year	Description	Source
1953	This map year shows the following: a shaded area within the southwestern quadrant of the Project site, indicating urban development; two tanks within the southeast quadrant of the Project site; two roads trending east-west, which appear to be consistent with the present-day layout of Madelena Street and Cardinal Street; a road trending north-south, which appear to be consistent with the present-day layout of East Bloom Street; and a playground within the southwest quadrant of the Project site. The railroad tracks depicted within the southwestern portion of the project site in the 1894 topographic map are no longer present. The Los Angeles River to the east and southeast appears to be channelized.	TM
1953	This map year shows the following: multiple dwellings/apartments in their present-day configuration (William Mead Homes, “Federal Housing Project”), a burlap sack warehouse, a gas & oil station, a community building with a workshop, and a playing field in the southwestern corner. No depiction of Zanja No. 6-1 is shown within, immediately adjacent, or in close proximity to the Project site.	Sanborn
1954	Similar mapped features depicted in the 1953 Sanborn. No depiction of Zanja No. 6-1 is shown within, immediately adjacent, or in close proximity to the Project site.	Sanborn
1957	Similar mapped features depicted in the 1954 Sanborn. No depiction of Zanja No. 6-1 is shown within, immediately adjacent, or in close proximity to the Project site.	Sanborn
1960	This map year shows the following: multiple dwellings/apartments in their present-day configuration (William Mead Homes, “Federal Housing Project”); a community building with a workshop; and a playing field in the southwestern corner. No depiction of Zanja No. 6-1 is shown within, immediately adjacent, or in close proximity to the Project site.	Sanborn
1964	Similar features captured in the 1948 aerial photograph.	AP
1964	Similar mapped features depicted in the 1960 Sanborn. No depiction of Zanja No. 6-1 is shown within, immediately adjacent, or in close proximity to the Project site.	Sanborn
1965	Similar mapped features depicted in the 1964 Sanborn. No depiction of Zanja No. 6-1 is shown within, immediately adjacent, or in close proximity to the Project site.	Sanborn
1966	This map year shows the following: the project site is within an area labeled “Mission Junc”; a shaded area and a structure within the southwest quadrant of the Project site; two light duty roads trending east-west, which appear to be consistent with the present-day layout of Madelena Street and Cardinal Street; and a light duty road trending north-south, which appears to be consistent with the present-day layout of East Bloom Street.	TM
1970	Similar mapped features depicted in the 1965 Sanborn. No depiction of Zanja No. 6-1 is shown within, immediately adjacent, or in close proximity to the Project site.	Sanborn
1972	Similar mapped features depicted in the 1966 topographic map.	TM
1972	Similar features captured in the 1948 aerial photograph.	AP
1980	Similar features captured in the 1948 aerial photograph.	AP

Housing Authority of the City of Los Angeles
William Mead Homes Project

Year	Description	Source
1981	Similar mapped features depicted in the 1972 topographic map.	TM
1988	Similar features captured in the 1948 aerial photograph.	AP
1994	Similar features captured in the 1948 aerial photograph.	AP
1994	Similar mapped features depicted in the 1981 topographic map.	TM
1995	Similar features captured in the 1948 aerial photograph.	AP
2005	This aerial shows the following: Similar features captured in the 1948 aerial photograph and a baseball field in the southwestern portion of the Project site.	AP
2009; 2010	Similar features captured in the 2005 aerial photograph.	AP
2012; 2014	Similar features captured in the 2005 aerial photograph.	AP
2015	This map year shows the following: the project site is northeast of the area labeled “New Chinatown”; two light duty roads trending east-west, which appear to be consistent with the present-day layout of Madelena Street and Cardinal Street; and a light duty road trending north-south, which appears to be consistent with the present-day layout of East Bloom Street.	TM
2016; 2018	Similar features captured in the 2005 aerial photograph.	AP
2018	Similar mapped features depicted in the 2015 topographic map.	TM
2020	Similar features captured in the 2005 aerial photograph.	AP
2022	Similar mapped features depicted in the 2018 topographic map.	TM
Source: Rincon 2022, Sanborn var.		

4.2.4 Soil Remediation Plans and Action Reports Review

As noted in the Research Methods section of this report, the background research conducted for this study identified several studies which were previously prepared to address soil contamination and remediation activities within the project site. As these studies provide an understanding of previous project site use and ground disturbances, they may inform on the archaeological sensitivity of the project site and are therefore, summarized below.

Soil Management, Implementation and Enforcement Plan

The Soil Management, Implementation and Enforcement Plan (SMIEP) was prepared by Bureau Veritas North America, Inc. (Bureau Veritas 2012). The SMIEP provides a framework for managing residual concentrations of chemicals in soils identified within the project site consistent with the human health risk assessment and DTSC requirements. The SMIEP includes information related to previous use of the project site, remedial activities, and soil management measures. According to the SMIEP, the project site previously operated as an oil refinery and petroleum product tanks farm from the early 1900s to circa 1920. Following this historical land use, the project site was occupied by iron and steel companies until 1942, when the project site was deeded to HACLA. The project site has been occupied by multi-residential public housing structures associated with the William Mead Public Housing since 1942.

According to the report, Camp Dresser & McGee (CDM) prepared a Removal Action Workplan (RAW) in 1998 and the RAW was approved by the DTSC in April 2000. CDM implemented the approved RAW by completing soil excavations within the project site from May 2000 through May 2001, resulting in the removal of 32,191 cubic yards of soil. CDM prepared a Removal Action Plan (RAP) in June 2002 (approved by DTSC in March 2003). CDM implemented the approved RAP by completing soil excavations at the Site from August 2004 through June 2005, resulting in the removal of 7,223 cubic yards of soil and noted that several areas of soil containing lead and polynuclear aromatic hydrocarbons (PAHs) above the clean-up levels were not excavated due to various project site constraints, though the locations of the areas not subjected to soil remediation activities is not provided within the SMIEP. Soil management measures included within the report require written approval by DTSC prior to any soil disturbance within restricted areas, including prior notification of HACLA. The soil management measures include information related to soil disposal from the Restricted Areas as follows:

- Soil currently located in Restricted Areas that becomes exposed from any activity should be segregated, placed on plastic sheeting or other impervious material, and stored apart from other site activities.
- Soils excavated from Restricted Areas should not be reused onsite and should not be removed from the [Project site] until it has been sampled and tested for the presence of hazardous materials according to the profiling requirements of the facility where the soil will be disposed.

Based on a review of this SMIEP, nearly 40,000 cubic yards of soil has been removed from the Project site. Additionally, based on the protocols for soil management requirements, any soil within the Restricted Areas that have been inadvertently exposed or excavated is subject to removal/export from the Project site. The Restricted Areas are primarily limited to areas north of Cardinal Street and one location south of Cardinal Street, west of Building 24, as mapped in Figure 2 of the SMIEP.

Restricted Areas are defined as areas where lead and PAHs were identified that exceed clean-up levels. No soil below 4 feet 6 inches bgs within the entire Restricted Area is to be excavated as this layer serves as a buffer for the impacted soils, which are present at depths below 5 feet bgs. The Restricted Areas include:

- Areas beneath existing buildings, all hardscapes, including porches, concrete walkways and surfaces, asphalt paved areas, parking areas and streets;
- The entire project site within 5 feet of extant buildings where excavation only extended to 2 feet bgs;
- Three-foot buffer zone along the Project site's western boundary from Bolero Lane to Cardinal Street and the entire width of the western alleyway between the existing Community Center and adjacent building on the former Witco facility;
- Six-foot diameter circular areas around the extant large trees; and
- The areas beneath the Head Start Pre-School Playground, which is capped with resilient play surface.

2018 Five-Year Remedial Action Review Report

The 2018 Five-Year Remedial Action Review Report (Bureau Veritas 2018) documents the 2018 annual inspection for the Restricted Areas within the project site and summarizes information related to previous soil excavation activities performed in accordance with the RAW and RAP approved by the DTSC, which required that contaminated soil at the Site be excavated to a minimum depth of 2 feet bgs near site structures and to a maximum depth of 5 feet bgs in other areas.

According to the report, soil excavation was conducted in 2000, 2001, 2004, and 2005. The report noted that soil at the Head Start facility within a Restricted Area of the project site was disturbed during renovation activities on October 31, 2017, and involved concrete removal that resulted in minor soil disturbance, which underwent re-sealing and re-concrete work shortly after November 2017. Further, the report notes that all food crops and plants are to not to be grown directly within the soil, but rather, is required to be grown in above-ground planter boxes to ensure compliance with the Land Use Covenant.

2023 Five-Year Remedial Action Review and Annual Site Inspection Report

The 2023 Five-Year Remedial Action Review and Annual Site Inspection Report (Apex 2023) documents the 2023 annual inspection for the Restricted Areas within the project site and summarizes information related to previous soil excavation activities performed in accordance with the RAW and RAP approved by the DTSC. The 2023 report essentially summarizes the information documented in the 2018 Five-Year Remedial Action Review Report prepared by the Bureau Veritas in 2018. The report includes information gathered as a result of the annual inspection, including information pertaining to soil disturbance that has occurred since the 2018 annual review.

According to the report, during the June 26, 2023, site inspection, soil disturbance was confirmed to have occurred within two non-restricted areas within the project site and involved surficial soil disturbance associated with the construction of concrete handicap access ramps to select housing units; the exact locations of these disturbances is not provided within the report.

Phase I Environmental Site Assessment (Rincon 2022)

The Phase I Environmental Site Assessment was prepared by Rincon for HACLA, addresses the entirety of the Project site, including an adjacent parcel to the southwest, and documents the findings and opinions regarding the presence of recognized environmental conditions (Rincon 2022). Information relevant to previous and present site use, including any information pertaining to ground disturbance was reviewed and pertinent information, as it relates to the Project site, is summarized below.

According to the report, an oil refinery previously operated on the project site from 1900 to 1924. Within the Project site, south of Cardinal Street, PAH- and lead-impacted soil was excavated and disposed offsite in 2000. Within the project site north of Cardinal Street, PAH- and lead-impacted soil was excavated and disposed offsite in 2004. The project site has active land use restrictions for soil-disturbing activities. The report includes a review of records, which details the following information regarding previous use of the Project site: former onsite Southern Refinery (southwestern portion of Project site); and former onsite Amalgamated Oil Co. oil aboveground storage tanks (ASTs) in 1906. A site reconnaissance performed as part of the Phase I ESA did not identify any evidence of historical uses of the site. Additionally, the report determined that it does not appear that thorough subsurface investigations have been completed in the area of the following locations: of the former refinery (southwest portion of the Project site); in the area of the former Oil ASTs (southeast portion of the Project site); and in the area of the onsite single-track railroad spurs and large rectangular building of unknown use in the southwestern portion of the Project site.

4.2.5 Geoarchaeological Review

Summary of Environmental Setting

The project site is situated within the northernmost Peninsular Ranges Geomorphic Province (California Geological Survey 2015). This geomorphic province is characterized by northwest trending mountain ranges and valleys that extend from the northern tip of the Baja Peninsula to the Transverse Ranges. More specifically, the project site is situated within the northern portion of the physiographic area known as the Los Angeles Basin, within the floodplain of the Los Angeles River. The Los Angeles River channel is approximately 260 feet east of the Project site. The Los Angeles Basin is bounded by the following notable landform features: Santa Monica Mountains to the north; the Elysian Hills and Repetto Hills on the northeast; Puente Hills to the east; the Palos Verdes Peninsula and the Pacific Ocean to the south; and the Santa Ana Mountains and San Joaquin Hills on the southeast (Geocon 2023).

According to the to the Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2024a), the project site consists of one soil type: Urban land, commercial with 0 to 5 percent slopes with Urban land accounting for approximately 90 percent of the soil type within the Project site. Urban land within this context is described as loamy bottom; however, in general, Urban land refers to soils in areas of high population density in a largely built environment and can include human-transported or human-altered materials, minimally altered materials, or intact native soils (USDA 2019). The available USDA soil descriptions for the other soil components within the project site is provided below.

- **Hueneme Series (USDA 2024b).** Hueneme Series soils are characterized as grayish brown, loamy fine sand and light sandy loam, moderately alkaline A horizons and stratified, grayish brown,

light brownish gray and light gray, calcareous C horizons of sandy loams through sands with thin silt layers, mottled, and containing segregated gypsum. Hueneme soils are in nearly level alluvial plains and basins in stratified alluvium that are derived from alkaline sedimentary sources. A typical profile of Hueneme Series soils features the following: loamy fine sand from 0 to 2 inches (A horizon); light sandy loam from 2 to 23 inches (A horizon); loamy sand from 23 to 37 inches (C horizon); sandy loam from 37 to 41 inches (C horizon); sand from 41 to 65 inches (C horizon); and stratified silt and sand from 65 to 70 inches (C horizon). Hueneme Series soils account for approximately 1 percent of the soils within the Project site.

- **San Emigdio Series (USDA 2024b).** San Emigdio Series soils are characterized as very deep, well drained soils that formed in dominantly sedimentary alluvium. San Emigdio soils are on alluvial fans, floodplains, and in narrow valleys and have slopes of 0 to 15 percent. A typical profile of San Emigdio soils features fine sandy loam from 0 to 60 inches (0 to 8 inches A horizon; 8 to 60 inches C horizon). San Emigdio Series soils account for approximately 1 percent of the soils within the Project site.

A review of the USGS mineral resources (USGS 2024) online spatial data for geology indicates that the project site is underlain by Quaternary alluvium and marine deposits from the Pleistocene to Holocene age. Holocene alluvial fan and stream deposits have the potential to support the presence of buried archaeological resources as these soils are contemporaneous with the documented period of prehistoric human habitation of the area and have potential to preserve cultural material in context, depending on the area-specific topographical setting. As previously mentioned, the Los Angeles River is located just east of the project site.

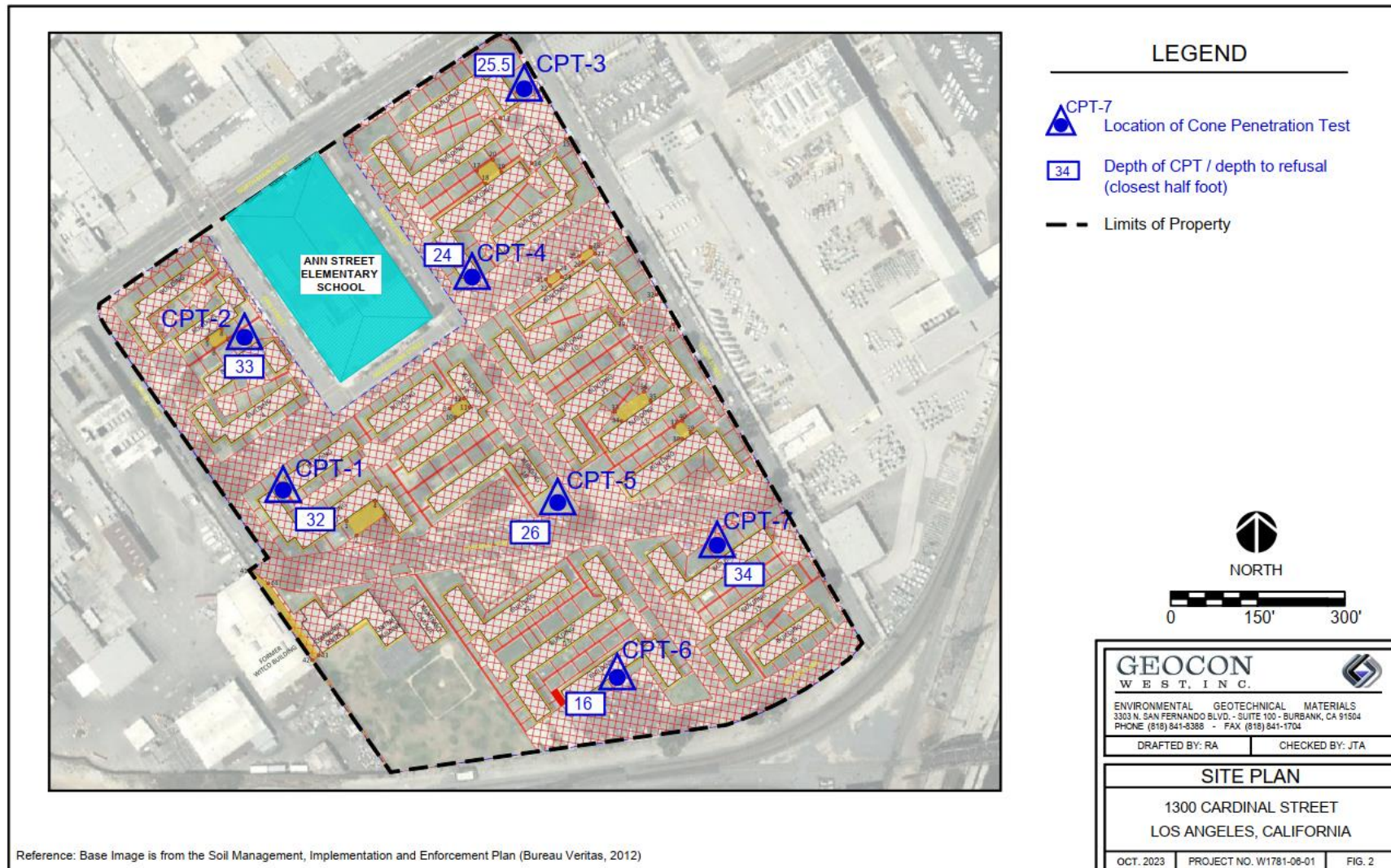
Summary of Previously Prepared Geotechnical Report

A geotechnical report was prepared for the project site by Geocon in 2023, *Geotechnical Feasibility Investigation, Future Redevelopment of HACLA William Mead Homes, 1300 Cardinal Street, Los Angeles, California* (Geocon 2023). Seven cone penetration tests (CPTs) were conducted within the project site to characterize subsurface materials (completed August 9, 2023). These CPTs were advanced to depths between approximately 16 to 34 feet bgs utilizing a truck-mounted 30-ton CPT rig.

According to the geotechnical report, the soils encountered include: 1) Artificial Fill: noted to be possibly associated with past grading, construction, or remediation activities, and was encountered from surface to approximately 3 feet bgs. The report further notes that deeper artificial fill may be present in other areas within the project site not subjected to subsurface investigations; (2) Young Alluvium (native soils): characterized as Holocene age alluvial soils derived from the Los Angeles River, consisting of interbedded sand and silty sand with various amounts of gravel and cobbles and lesser interbeds of sandy silt. Native soils were encountered underlying fill soils to the maximum depths explored.

The subsurface exploratory investigations completed in 2023 are depicted in Figure 3 below.

Figure 3 Subsurface Exploratory Investigations Completed in 2023



Source: Geocon 2023, Figure 2

Subsurface exploratory investigations revealed that fill soils are present from depths between surface and 3 feet bgs in the areas investigated and is underlain by Holocene alluvial soils. The project site is currently developed with the William Mead Public Housing, consisting of 415 units for public housing and one on-site health clinic, and communal grassy areas surrounding each building. Ground disturbance associated with the proposed new housing complex involves excavation for subterranean parking that would involve a maximum depth of approximately 20 feet bgs for the subterranean levels. In consideration of these factors, the potential to encounter Intact subsurface archaeological materials from current grade to approximately 3 feet bgs is unlikely; however, there is potential for intact cultural deposits to exist within native soils (below between 3 feet bgs) to the maximum depths of proposed ground disturbance.

4.2.6 Sacred Land File Search

On February 28, the NAHC responded to Rincon's contact list and SLF search request, stating that the results of the SLF search were positive. The SLF record is maintained at a public land survey system Section level, meaning the positive result is respective of a general area covering approximately one-square mile (640 acres) rather than the exact project site. See **Appendix B** for the NAHC response.

5 Survey

5.1 Methods

On February 27, 2024, Rincon Architectural Historian James Williams conducted a built environment survey of the project site. During the survey, built environment resources within the project site including buildings, structures and associated surrounding landscape elements were inspected. Mr. Williams confirmed the presence of William Mead Homes within the project site. He inspected the property to confirm that the descriptions of the property provided in the previous recordations are accurate and that the resource retains sufficient integrity to remain eligible for listing in the NRHP. Pursuant to OHP Guidelines (California OHP 1995:2); updated California Department of Parks (DPR) 523 series forms were prepared for the resource. The overall condition and integrity of the resource was documented and assessed. Site characteristics and conditions were documented using notes and digital photographs which are maintained at the Rincon Los Angeles office.

Along with Mr. Williams, Rincon Senior Archaeologist, Linda Kry conducted a pedestrian survey of the project site on February 27, 2024. Because the project site is within a developed setting with limited exposed sediment, an intensive archaeological survey was not conducted. Instead, a mixed approach (opportunistic survey) and reconnaissance survey (visual inspection) were utilized, selectively examining areas of exposed ground surfaces, which were limited to landscaped areas and areas that surround the existing buildings. Additionally, the location of the one previously recorded overlapping resource, P-19-002828, was revisited in order to document the current site conditions.

Exposed ground surfaces were examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historical debris (e.g., metal, glass, ceramics). Ground disturbances such as burrows and drainages were also visually inspected. All field notes, photographs, and records related to the survey for current study are on file at the Rincon Los Angeles office. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory.

5.2 Findings

5.2.1 Built Environment Resources

The following section summarizes the results of all background research and fieldwork as they pertain to built environment resources that may qualify as historical resources. The background research and survey conducted for this study resulted in the identification of one historic-age property within the project site, William Mead Homes (Figure 5 through Figure 9). Background research confirmed that the historical resource's eligibility of William Mead Homes has been previously considered several times and the property has been determined eligible for listing in the NRHP as a historic district under Criterion A for its association with the development of public and defense worker housing in Los Angeles during World War II, and under NRHP Criterion C as an excellent example of a Los Angeles public housing development that embodies the planning and design principles of the Garden City and Modern movements. The survey confirmed that the

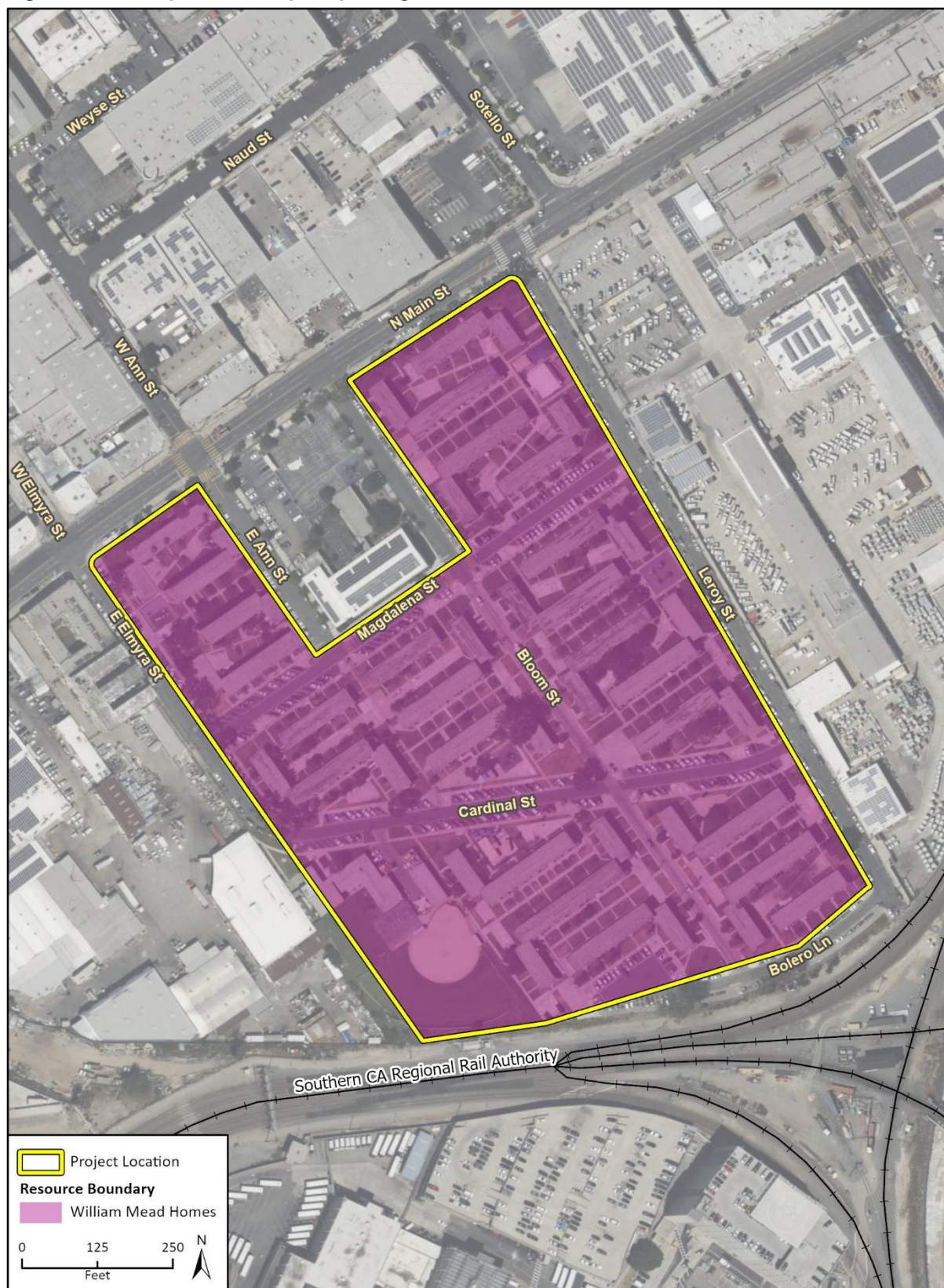
descriptions of the property provided in the previous recordations are accurate. As described in previous recordations, the district consists of six superblocks delineated by an internal street network and containing a series of two-to-three-story apartment buildings and a community building. The apartment buildings are of standardized design, with features including a rectangular or L-plan, brick and concrete construction, flat roofs with broad overhangs, cantilevered overhangs at the second story, and regularly spaced steel casement windows. The apartment buildings have incurred only limited alteration. Changes vary from building to building but generally include some combination of limited replacement of windows, including with modern vinyl and horizontally sliding aluminum sashes; replacement of exterior doors; installation of metal security doors; installation of steel balcony rails; and construction of accessibility ramps.

Blocks contain four or five apartment buildings each. Outside building footprints, the blocks are landscaped with lawns, mature trees of various species, and various ornamental plants. Landscaped areas are interspersed with concrete walkways and concrete-paved areas with common clothes lines. Other features occupying common space on the blocks include a modern preschool facility fronting Leroy Street between North Main and Magdalena streets and play equipment at three locations throughout the district.

The street grid is a semi-regular grid of low-capacity roads. In addition, there is a small historic parking lot at the south end of the district and a baseball diamond in the district's southwest corner.

The survey confirmed that the resource retains sufficient integrity, continues to convey its historical significance, and remains eligible for listing in the NRHP. Updated DPR forms were populated to document the property's existing conditions (**Appendix C**).

Figure 4 Survey Result Map Depicting William Mead Homes



Imagery provided by Microsoft Bing and its licensors © 2024.

24-15622 CR
CRFig 3 Resource Boundary

Figure 5 Overview of Representative Apartment Building at William Mead Homes



Figure 6 Representative View of Common Space Between Apartment Buildings



Figure 7 Representative View of Common Space Between Apartment Buildings



Figure 8 Representative View Down Internal Street



Figure 9 William Mead Homes Community Building, North and East Elevations



5.2.2 Archaeological Resources

The following section summarizes the results of all background research and fieldwork as they pertain to archaeological resources that may qualify as historical resources or unique archaeological resources.

The landscaped areas within the project site accounted for approximately 40 percent of the overall project site footprint. Within these landscape areas, less than 5 percent provided for observations of exposed ground surfaces and included the following areas: surrounding existing ornamental trees (Figure 10); bordering some of the existing buildings (Figure 11); areas of geotechnical investigations (Figure 12); and pockets of exposed soils within lawns present throughout the project site (Figure 13). In these areas, ground surface visibility was excellent (approximately 100 percent). However, in areas of existing development, including paved lots and hardscape, as well as dense grass and above-ground planters, ground surface visibility was poor/non-existent (0 percent).

As mapped in CHRIS records, resource P-19-002828, a historic period refuse deposit, was identified in an area between Building 24 and East Blossom Street. According to the DPR for P-19-002828, the exposed resources were collected and assessed as part of an emergency recovery action for the inadvertent discovery in October 2000. The recorder noted that resources associated with the site extended beneath extant Building 24 to the west and extended east into East Blossom Street and were left in place/undisturbed. The mapped location of this resource was revisited. While the resource was previously evaluated and was assigned a California OHP status code of 5 in the associated DPR, recommended eligible for local listing, the associated report LA-05425 prepared in January 2021 concluded that the site was not significant, as it has already yielded all of the data it is likely to contain; however, the report further states that there may be portions of this resource that have yet to be encountered and therefore, undisturbed, that may contain data that may provide information relative to changes over time. Due to the developed nature of this location and the presence of dense grass, no exposures of this resource were identified during the pedestrian survey.

In consideration of these factors, no further cultural resources considerations, including a DPR update are required for this resource for this study. Should portions of this resource be inadvertently encountered during project implementation, these resources would be subject to the recommended mitigation measures for archaeological resources discussed in Section 7.2.1 of this report.

During the survey, a portion of the original street surface for North Main Street was identified underlying the present-day sidewalk at the southwest intersection North Main Street and Leroy Street (Figure 14). Current project design does not involve any impacts to the roadways or sidewalks that border the project site to the north, south, east, and west. As such, the project, as currently proposed, would not have a significant impact on this previously unknown and newly identified archaeological resource. Therefore, no further cultural considerations are required for this resource.

Based on observations of present site conditions reviewed against the geotechnical and soil remediation reports that address the project site, the areas of exposed ground soils have been disturbed by soil remediation, geotechnical investigation, landscaping, and maintenance activities. Soils observed consisted of a dark brown loamy fine sand and tan sand, consistent with the USDA's description of Urban land, commercial, including artificial fill soils as characterized in the geotechnical investigation that was discussed in Section 4.2.5 Geoarchaeological Review. As previously mentioned in Section 4.2.5 Geoarchaeological Review of this report, subsurface exploratory boring investigations encountered fill soils from surface to between approximately 3 feet bgs within the project site. Additionally, as a result of previous soil remediation activities performed on site in 2000, 2001, 2004, and 2005, nearly 40,000 cubic yards of soil has been removed from the project site, though the locations and depths associated with these excavations and soil removal are unknown. However, the SMIEP indicates that no soil below 4 feet 6 inches bgs within the entire Restricted Area is to be excavated.

The presence of the fill soil is an indication that any potential archaeological material from the surface to depths between 3 and 4 feet 6 inches bgs, has been previously displaced from the primary depositional location, buried, or destroyed. Additionally, the presence of fill soils demonstrates that the native soils upon and within which archaeological deposits would exist in context was not observed during the survey. No archaeological resources were identified within the project site during the field survey.

**Figure 10 Representative Photograph of Exposed Ground Surface Within the Project Site-
Surrounding Existing Ornamental Trees**



**Figure 11 Representative Photograph of Exposed Ground Surface Within the Project Site-
Bordering Existing Buildings**



**Figure 12 Representative Photograph of Exposed Ground Surface Within the Project Site-
Areas of Geotechnical Investigations**



Figure 13 Representative Photograph of Exposed Ground Surface Within the Project Site-Pockets of Exposed Soil Within Lawns



Figure 14 Identified Original Street Surface-North Main Street



6 Impacts Analysis and Conclusions

The impact analysis included here is organized based on the cultural resources thresholds included in CEQA Guidelines Appendix G: Environmental Checklist Form:

- a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
- b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
- c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Threshold A broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, we have chosen to limit analysis under Threshold A to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under Threshold B.

6.1 Historical Built Environment Resources

This study confirmed that the project site is composed of one built environment historical resource, the William Mead Homes property. As detailed above in Section 4 and 5, the resource was determined eligible for the NRHP, with SHPO concurrence, and is listed in the CRHR; the property therefore qualifies as a historical resource as defined by Section 15064.5(a) of the CEQA Guidelines. The project would result in the demolition of buildings and structures that contribute to the resource's eligibility for listing in the NRHP and CRHR. As such, the project would cause the material impairment of William Mead Homes, meaning it would alter in an adverse manner, those physical characteristics that convey its historical significance and that justify its inclusion in the NRHP and CRHR. The project would therefore result in a substantial adverse change to the significance of a historical resource and result in a ***significant and unavoidable impact to historical resources*** pursuant to CEQA.

6.1.1 Recommended Mitigation

Although the impact of the demolition of a historical resource may not be mitigated to a level of less than significant, the following measures are recommended to reduce impacts to the greatest extent feasible. They are generally consistent with other measures adopted for recent similar projects in the area.

Interpretive Display

HACLA, as lead agency and Applicant, shall retain a qualified historian or architectural historian meeting the Secretary of the Interior's Qualification Standards (NPS 1983) in coordination with the City of Los Angeles Office of Historic Resources to prepare content for an interpretive display in a portion of the project site which will be open to the public. The interpretive display shall be completed and installed prior to the issuance of occupancy permits for the new development. It

shall include a brief history of William Mead Homes and present its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure CUL-2. The Interpretive Display may be rotated amongst publicly accessible spaces located throughout the project site with approval by HACLA.

Informational Website

HACLA shall add to their existing website a section dedicated to the history of William Mead Homes and public housing in Los Angeles within six months of the issuance of a grading permit for the project. The website shall be maintained by HACLA and shall provide content on the history of William Mead Homes, the significance of public housing in the city, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the city. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history and shall be periodically updated, as needed, if new scholarly information related to the history or significance of William Mead Homes and public housing become available following the initial publishing of the website.

6.2 Historical and Unique Archaeological Resources

A review of the CHRIS records search indicated that eight previous cultural resource studies have been conducted within a 0.5-mile of the project site between 1982 and 2017. Of these, two previous studies overlap the project site and collectively, these reports address approximately 80 percent of the project site. Of these, one report documents the results of an emergency recovery action for the inadvertent discovery of a historic period resource within the project site. This resource, a historic period refuse deposit, was also the only resource identified through the CHRIS as within the project site. While the site record completed in October 2000 assigned the resource a California OHP status code of 5, which indicates that the resource is historically significant by local government but is ineligible for the NRHP, the associated report prepared in January 2021, concluded that the resource was not significant under CEQA or the NHPA, as it has already yielded all of the data it is likely to contain. Additionally, a search of the NAHC SLF was positive for known Native American heritage resources. However, the SLF record is maintained at a public land survey system Section level, meaning the positive result is respective of a general area covering approximately one-square mile (640 acres) rather than the exact project site.

A review of historical maps and aerial photographs indicates that the project site was developed as early as 1888 and by 1890, multiple one-story dwellings, structures, and businesses were present within the project site. Development within the project site steadily continued through to the 1900s with the inclusion of railroad tracks. By 1906, major ground disturbance is observed as evidenced by the presence of the Amalgamated Oil Co. and the Southern Refining Co. and associated facility structures, including the expansion of railroad tracks just outside the project site to the south, southwest, and west. By the mid-twentieth century, the project site is once again observed to be subject to substantial ground disturbance with the removal of the late nineteenth to early twentieth

century residences and businesses to make way for the William Mead Homes and Cardinal Street. By 1960, the project site is shown to be generally consistent with present-day site conditions.

No archaeological resources were identified within the project site during the field survey. A review of the geotechnical report prepared for the project site identified artificial fill soils from surface to approximately 3 feet bgs within the project site. The presence of fill soils demonstrates that native soils, within which cultural deposits might exist in context, would not have been observed during the pedestrian survey. A review of the soil remediation reports and Phase I ESA that addresses the project site indicated that nearly 40,000 cubic yards of soil has been removed from the project site in 2000, 2001, 2004, and 2005. The Soil Management, Implementation and Enforcement Plan includes protocols stating that no soil below 4 feet 6 inches bgs within the entire Restricted Area is to be excavated. The current project design involves maximum excavation depth of 20 feet bgs for proposed subterranean levels.

Given the general sensitivity of the project site and vicinity, and the depths of previous discoveries of archaeological resources and human remains identified (between 3.5 inches and 19 feet bgs) within the project's 0.5-mile records search area, as well as the proximity of the Los Angeles River to the project site, there is a heightened potential to encounter intact resources within the project site during project construction. The Los Angeles River would have been a natural resource that indigenous and historic occupants of the area found hospitable to habitation and other activities. Environmental conditions within the project site and general vicinity include extensive alluvial activity with such alluvium potentially serving to preserve any indigenous or historic-period archaeological materials. Resources that are commonly encountered in these depositional contexts include pre-contact long and short-term habitation sites as well as historic residential/commercial building foundations, privies and other refuse deposits, and other buried infrastructure. All soil remediation/removal activities discussed above were performed after the development of the William Mead Homes, which suggests that resources, if present, would be preserved within native soils, below the depths of previous disturbance associated with these historical developments, within native soils.

In consideration of these factors, the potential to encounter intact deposits containing archaeological resources within soils between the current grade to depths between 3 feet and 4 feet 6 inches bgs is unlikely. However, there is potential given the context, for intact archaeological deposits to exist within previously undisturbed native soils to the proposed depths of disturbance of 20 feet bgs. Such resources could qualify as either historical resources or unique archaeological resources under CEQA. In the event that unanticipated or previously unknown archaeological resources are encountered during project implementation, impacts to these resources could be significant. Rincon recommends the following mitigation measures to ensure proper treatment of any unknown archaeological resources that may be encountered as a result of project construction. These recommended mitigation measures would ensure the proper treatment of any archaeological resources encountered during ground disturbing activities. With the proper implementation of the prescribed measures, Rincon recommends a finding of ***less-than-significant impact with mitigation incorporated for archaeological resources*** under CEQA.

6.2.1 Recommended Mitigation

Workers Environmental Awareness Program Training

All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of construction activities. A basic presentation shall be prepared and presented by a qualified archaeologist to inform all personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that archaeological resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, Native American representative. The necessity of training attendance shall be stated on all construction plans and the lead CEQA agency shall maintain records demonstrating construction worker WEAP participation.

Retention of a Qualified Archaeologist and Archaeological Monitoring

In consideration of the general sensitivity of the project site for archaeological resources, prior to the issuance of a grading permit, the Applicant and/or subsequent responsible parties shall retain an archaeologist meeting the Secretary of the Interior's Qualifications Standards (NPS 1983) (Qualified Archaeologist) to oversee the implementation of all cultural resources mitigation measures. Given the presence of contaminated soils on site, the archaeological monitor shall be certified for Hazardous Waste Operations and Emergency Response (HAZWOPER) as required by the Occupational Safety and Health Administration (OSHA) standard 29 CFR Part 1910.120.

The Qualified Archaeologist shall oversee an archaeological monitor possessing experience and familiarity with historic period and prehistoric resources in the region. The archaeological monitor shall conduct full-time monitoring within native soils at depths below 4 feet 6 inches to the project's proposed maximum depths of disturbance. In general, archaeological monitoring shall be limited to initial ground disturbance which is defined as construction-related earthmoving of sediments from their native place of deposition and does not include any secondary movement of sediment that might be required for the project. The Qualified Archaeologist may adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter archaeological deposits. The archaeological monitor shall be responsible for maintaining daily monitoring logs. Following the completion of construction, the Qualified Archaeologist shall prepare an archaeological monitoring report for submittal to the lead agency and the SCCIC with the results of the archaeological monitoring program.

Inadvertent Discovery of Archaeological Resources

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities that have not been previously identified, work in a 100-foot radius of the find shall be halted and redirected. The Qualified Archaeologist or other designated archaeologist working under the direction of the Qualified Archaeologist, shall provide recommendations regarding the resource's potential significance and potential treatment in coordination with HACLA and a Native American representative for resources of indigenous origin. If the discovery is identified to be a site (generally more than three artifacts), the evaluation shall require preparation of an Archaeological Testing Plan (ATP) to determine if the resource qualifies for California Register of Historical

Resources (CRHR) listing. Such evaluations will be used to determine if the project may have a significant impact on the resource. Following the execution of the ATP, if HACLA in consultation with the Qualified Archaeologist, determines the discovery is significant and cannot be avoided by the project, additional work such as an Archaeological Data Recovery Program (ADRP) shall be completed prior to the resumption of ground-disturbing activities in the immediate area to mitigate any significant impacts to cultural resources. The ATP and ADRP are described in further detail below.

The CRHR criteria for evaluating the significance of archaeological resources shall be used in the event a cultural resource is discovered. If resources are discovered that the Qualified Archaeologist recommends the resource meets the significance criteria of CRHR Criterion 4, and if preservation in place is not feasible, an ADRP shall be implemented. If resources are found to meet the CRHR criteria 1 and/or 2 and/or 3, then representatives of the appropriate descent community or the appropriate community members shall be notified upon the determination.

- **Archaeological Testing Plan:**

The purpose of the ATP will be to determine the extent and possible presence/absence of archaeological resources and to identify whether the resources constitute an historical resource using the criteria of the CRHR.

- All work shall be conducted in accordance with the approved ATP.
- At the completion of the ATP, the Qualified Archaeologist shall submit a written report of the findings.
- If the Qualified Archaeologist determines the project may result in a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5, at the discretion of the project sponsors either:
 - The project shall be re-designed as to avoid any potential significant impacts; or
 - A data recovery program shall be implemented.

- **Archaeological Data Recovery Program:**

Should a cultural resource that qualified for CRHR listing under Criterion 4 for data potential be identified and cannot be avoided by the project, an ADRP shall be completed to comprehensively document the resource and exhaust the data potential. The ADRP shall be conducted by the Qualified Archaeologist in accordance with the California Office of Historic Preservation's (OHP) 1990 *Archaeological Resource Management Reports: Recommended Contents and Format*.

Prior to implementing the field component of the ADRP, a Data Recovery Plan (Plan) shall be prepared by the Qualified Archaeologist selected to carry out the ADRP. The Plan shall be prepared in consultation with Native American groups who have participated in consultation for the project and reviewed and approved by HACLA. The Plan shall, at minimum, include the following:

- Field Methods and Procedures
- Thresholds for Achieving Data Redundancy
- Cataloguing and Laboratory Analysis
- Discard and Deaccession Policy
- Interpretive Program
- Security Measures

- Final Report
- Curation

6.3 Human Remains

No prehistoric or historic period burials, within or outside formal cemeteries were identified within the project site as a result of the CHRIS records search, SLF search, or pedestrian survey. However, human remains have been recovered in the general vicinity. In the event that human remains are inadvertently encountered during ground disturbing activities, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. If the County Coroner determines that the remains are, or believed to be Native American origin, he or she is required to notify the NAHC that shall notify those persons believed to be the most likely descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. With adherence to existing regulations, Rincon recommends a finding of ***less-than-significant impact to human remains*** under CEQA.

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- 2004 *A Phase I Archaeological Study for the William Mead Homes Site (1300 N. Cardinal Street) Bounded by North Main Street, Elmyra Street, Leroy Street and the Spur Line, City of Los Angeles, County of Los Angeles, California* (Study LA-08521). Report on file with the South Central Coastal Information Center Fullerton State University, Fullerton.
- 1992a *Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California* (Study LA-02577). Report on file with the South Central Coastal Information Center Fullerton State University, Fullerton.
- 1992b *The Result of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California* (Study LA-2644). On file with the South Central Coastal Information Center Fullerton State University, Fullerton.

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Appendix A

California Historical Resources Information System Search Results

Report List

24-15622 William Mead

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-02421		1990	White, Robert S.	An Archaeological Assessment of Tt 48450: a 5 Acre Parcel in Palmdale, Los Angeles County	Archaeological Associates, Ltd.	
LA-02577		1992	Wlodarski, Robert J.	Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California	Historical, Environmental, Archaeological, Research, Team	19-000007, 19-000098, 19-000385, 19-000389, 19-000390, 19-000887, 19-001112, 19-001575
LA-02618		1992	Greenwood, Roberta S., John M. Foster, and Judith A. Rasson	Historical and Archaeological Assessment of the Southern California Rapid Transit District (scrt) Union Station Headquarters Project	Greenwood and Associates	19-001575
LA-02644		1992	Wlodarski, Robert J.	The Results of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California	Historical, Environmental, Archaeological, Research, Team	19-000385, 19-000389
LA-02965		1994	Norwood, Richard H.	Phase I Cultural Resource Investigation for Assessment District 93-3 Lancaster, Los Angeles County, California	RT Factfinders	19-002183, 19-002184, 19-002185
LA-03151		1994	Dillon, Brian D.	Alameda District Plan, Los Angeles California: Prehistoric and Early Historic Archaeological Research		19-000007, 19-000887, 19-001112, 19-001575
LA-03497		1994	Anonymous	Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.	
LA-03498		1994	Anonymous	Final Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.	
LA-03498A			Saurenman, Hugh	Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System	Harris Miller Miller & Hanson Inc	
LA-03908		1983	Frierman, Jay D.	Monitoring the Repaving of an Area in Front of the Trash Compactor Located on Parking Lot No. 2, El Pueblo De Los Angeles State Historic Park (at the Corner of Macy Street and North Main	S.O.P.A.	19-000887
LA-04043		1990	Meyer, Dorothy L. and Carlisle, Alma M.	Seismic Strengthening of Existing Bridges - Group J: North Main Street Bridge Over the Los Angeles River Bridge CA53C 1010	City of Los Angeles	19-192483
LA-04044		1995	Unknown	Environmental Impact Report : Seismic Retrofit of Olympic Boulevard and North Broadway Bridges Over the Los Angeles River	Environmental Management Section of City of Los Angeles	19-180827, 19-192481

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24-15622 William Mead

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-04048		1985	Singer, Clay A.	Archaeological Surface Surveys of Three Proposed Railway Connections in Downtown Los Angeles, Los Nietos / Santa Fe Springs, and Colton, California		
LA-04386		1993	Anonymous	Cultural Resources Overview Los Angeles County Metropolitan Transportation Authority's Interstate Commerce Commission Abandonment Exemption Pasadena-Los Angeles Light Rail Transit Project	Caltrans	
LA-04448		1994	Richard Starzak	Section 106 Documentation for the Metro Rail Red Line East Extension in the City and County of Los Angeles, California	Myra L. Frank & Associates	19-150193, 19-150194, 19-150195, 19-167081, 19-171159, 19-172755, 19-174235, 19-174939, 19-174940, 19-174941, 19-174942, 19-174943, 19-174944, 19-174946, 19-174947, 19-174948, 19-174949, 19-174950, 19-174951, 19-174952, 19-174953, 19-174954, 19-174955, 19-174956, 19-174957, 19-174958, 19-174959, 19-174960, 19-174963, 19-174964, 19-174965, 19-174967, 19-174968, 19-174969, 19-174970, 19-174971, 19-174972, 19-174973, 19-174974, 19-174975, 19-174976, 19-174977, 19-174978, 19-174979, 19-176524, 19-176589
LA-04452		1982	Hatheway, Roger G.	Determination of Eligibility Report Chinatown	Roger G. Hatheway & Associates	19-150329, 19-170868, 19-170869, 19-170870, 19-170871, 19-170872, 19-170875, 19-170876, 19-170877, 19-170878, 19-170879, 19-170880, 19-170881, 19-170882, 19-170883, 19-170884, 19-170885, 19-170886, 19-170887, 19-170888, 19-170889, 19-170890, 19-170891, 19-170892, 19-170894, 19-170895, 19-170896, 19-170897, 19-170898, 19-170899, 19-170900, 19-170901, 19-170949, 19-170950, 19-170951, 19-170953, 19-170954, 19-170955, 19-170956, 19-170957, 19-170958, 19-170959, 19-170960, 19-170961, 19-170962, 19-170963, 19-170964, 19-170965

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-04835		1999	Ashkar, Shahira	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties	Jones & Stokes Associates, Inc.	19-186109, 19-186112, 19-187090
LA-05201		2001	Foster, John M.	Archaeological Assessment of the Proposed Hazardous Materials Storage Building at the Central Maintenance Facility, Los Angeles	Greenwood and Associates	19-001575
LA-05425		2001	Bissell, Ronald M.	Emergency Recovery Actions at CA-LAN-2828, Los Angeles County, California	RMW Paleo Associates, Inc.	19-002828
LA-05450		2001	Savastio, Scott A.	Archaeological Monitoring Report: Los Angeles Web Host 900 South Alameda Street, Los Angeles, California	Greenwood and Associates	19-000007
LA-06335		2003	Messick, Peter, Greenwood, Roberta S., and Alice Hale	Archaeological Monitor Report Historic Cornfield Railroad Yard	Greenwood and Associates	19-003120
LA-06336		2002	Foster, John M.	Archaeological Inventory for Soil Remediation Cornfield Rail Yard Project City of Los Angeles, California	Greenwood and Associates	
LA-06344		2001	Foster, John M.	Archaeological Assessment of the Proposed Hazardous Materials Storage Building at the Central Maintenance Facility, Los Angeles	Greenwood and Associates	
LA-06360		2000	Dewitt, John	City of Los Angeles/cornfields Site Eda Grant Application	City of Los Angeles	
LA-06363		2000	Flores, Xochi	Construction of the Homeboy Bakery, Los Angeles, Los Angeles	Proyecto Pastoral at Delores Mission	
LA-06368		2000	Lapin, Philippe	Cultural Resource Assessment for Pacific Bell Wireless Facility La 798-01, County of Los Angeles, California	LSA Associates, Inc.	
LA-06840		2003	Budinger, Fred E., Jr.	Phase I Archaeological Survey Former Aliso Street Mgp Site Los Angeles, California	Tetra Tech, Inc.	
LA-07425		2004	McMorris, Christopher	City of Los Angeles Monumental Bridges 1900-1950: Historic Context and Evaluation Guidelines	JRP Historical Consulting	19-150194, 19-150195, 19-192480, 19-192481, 19-192482, 19-192483, 19-192484, 19-192485, 19-192486
LA-08252		1986	Snyder, John W., Mikesell, Stephen, and Pierzinski	Request for Determination of Eligibility for Inclusion in the National Register of Historic Places/Historic Bridges in California: Concrete Arch, Suspension, Steel Girder and Steel Arch	Caltrans	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-08512		2004	Gust, Sherri and Mari Pritchard Parker	Relationship of the Zanja Madre to Mta's Gold Line Property in River Station Yard, City of Los Angeles	Cogstone Resource Management, Inc.	19-003100, 19-003101, 19-003102, 19-003103
LA-08521		2004	Wlodarski, Robert J.	A Phase I Archaeological Study for the William Mead Homes Site (1300 N. Cardinal Street) Bounded by North Main Street, Elmyra Street, Leroy Street and the Sprr Line, City of Los Angeles, County of Los Angeles, California	Historical, Environmental, Archaeological, Research, Team	
LA-08533		2004	Hale, Alice E. and Scott Savastio	Archaeological Monitor Report: the California Endowment, Downtown Headquarters and Conference Center Project, Los Angeles, California	Greenwood and Associates	19-003181
LA-10638		2010	Tang, Bai "Tom"	Preliminary Historical/ Archaeological Resources Study, Southern California Regional Rail Authority (SCRRA) River Subdivision Positive Train Control Project, City of Los Angeles, Los Angeles County, California	CRM Tech	19-001575, 19-003777, 19-180827, 19-186112, 19-186804, 19-186859, 19-188229, 19-188246, 19-188524
LA-10641		2010	Tang, Bai "Tom"	Preliminary Historical/Archaeological Resources Study, San Bernadino Line Positive Train Control Project, Southern California Regional Rail Authority, Counties of Los Angeles and San Bernadino	CRM Tech	
LA-10773		2005	Keck, David	Los Angeles State Historic Park General Plan and Final Environmental Impact Report	ESA	
LA-11404		2011	Loftus, Shannon	Cultural Resource Records Search and Site Survey, AT&T Site LAC159, Far East National Bank 977 North Broadway, Los Angeles, Los Angeles County, California 90012	ACE Environmental, LLC	19-003102, 19-003120, 19-003650, 19-004183, 19-150329, 19-170901, 19-170949, 19-179645, 19-187560
LA-11591	Paleo -	2010	Maxon, Patrick	Archaeological and Paleontological Assessment, Proposed Albion Dairy Demolition And Remediation and Albion Riverside Park Project	BonTerra Consulting	
LA-13146		2015	Furnis, Lynn and Sherri Gust	ARCHAEOLOGICAL MONITORING COMPLIANCE REPORT FOR THE BLOSSOM PLAZE PROJECT, CITY OF LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA	Cogstone	19-003103, 19-004601

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-13219		2016	Roland, Jennifer	Phase I Investigation for the Crown Castle TMT LA107 LA-107-00 Tower Installation Project, Los Angeles, Los Angeles County, California	NWB Environmental Services, LLC	
LA-13224		2016	Strauss, Monica	Archaeological Resources Monitoring Conducted for the 100 Rondout Street Project (SWC03123)	ESA	
LA-13239		2017	Gust, Sherri	Extent of Zanja Madre	Cogstone	19-003103, 19-004113, 19-190309

Reports 1/2 13239

Cultural Resources Study



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--- Half-Mile Buffer
 Area of Potential Effects



0 1,000 2,000 Feet
 0 250 500 Meters
 1:24,000

Records Search Map

Rincon Consultants, Inc.

Reports 2/ 4386, 3497, 3498



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--- Half-Mile Buffer
 Area of Potential Effects



0 1,000 2,000 Feet

0 250 500 Meters

1:24,000

Records Search Map



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Record Search Report Proximity Sheet

Project Name: 24-15622 William Mead Historic Assessment

Report Number	Within Project Site	Adjacent to Project Site	Outside of Project Site
13239			X
13219			X
13224			X
13146			X
4044			X
7425			X
4043			X
5201			X
4048			X
3908			X
6360			X
8512			X
10773			X
11404			X
10368			X
5425	X		

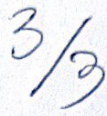


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Record Search Report Proximity Sheet

Project Name: 24-15266 William Mead

Report Number	Within Project Site	Adjacent to Project Site	Outside of Project Site
6840		X	
6344			X
8533			X
8521			X
11591			X
2965			X
2577		X	
2644		X	
2618			X
6335			X
6336			X
4386			X
3497			X
3498			X
4448			X
4452			X



Project Name:

24-15266 William Mead

[illegible]

Resource List

24-15622 William Mead

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-001575	CA-LAN-001575/H	Resource Name - MR-1	Site	Prehistoric, Historic	AH02; AH04; AH05; AH06; AH07; AH09; AH11; AH12; AP02; AP09; AP15	1989 (John M. Foster, Greenwood & Associates); 2000 (M. Horne, K. Warren, Applied Earthworks); 2004 (Warren, Applied Earthworks); 2020 (S. Gordenstein, Applied Earthworks); 2022 (K. Warren, Applied Earthworks, Inc)	LA-02486, LA-02577, LA-02618, LA-02727, LA-02950, LA-03103, LA-03151, LA-03645, LA-03786, LA-05201, LA-06382, LA-07564, LA-07826, LA-09844, LA-10397, LA-10543, LA-10638, LA-10894, LA-11048, LA-11141, LA-11765, LA-12583, LA-12586, LA-13510, OR-03267, VN-01265
P-19-002828	CA-LAN-002828H	Resource Name - William Mead Homes Site 1	Site	Historic	AH04	2000 (Ronald M. Bissell, RMW Paleo Associates)	LA-05425, LA-10543
P-19-003100	CA-LAN-003100H	Resource Name - NS1 Hisotirc Artifact Scatter	Site	Historic	AH04	2002 (A. Wesson, URS Corporation)	LA-08512, LA-10541, LA-10543
P-19-003101	CA-LAN-003101H	Resource Name - NS2 Historic Artifact Scatter	Site	Historic	AH04	2002 (A. Wesson, URS)	LA-08512, LA-10541, LA-10543
P-19-003102	CA-LAN-003102H	Resource Name - NS3 Brick Wall/Foundation and Historic Artifact; Other - Concentration	Site	Historic	AH02; AH04; AH11	2002 (A. Wesson, URS)	LA-08512, LA-10541, LA-11404
P-19-003103	CA-LAN-003103H	Resource Name - Zanja Madre (Water Conveyance Feature)	Structure, Site	Protohistoric, Historic	AH04; AH06; HP20; HP36	2002 (A. Wesson, URS); 2011 (Heather Gibson, AECOM); 2014 (L. Furnis, Cogstone); 2014 (Carren Jao, KCET)	LA-08512, LA-10543, LA-11710, LA-12583, LA-13146, LA-13239
P-19-003120	CA-LAN-003120H	Resource Name - Los Angeles State Historic Park / River Station Area / Southern Pacific Railroad; Other - LAHCM #82; Other - Cornfield; Other - River Station	Structure, Object, Site	Historic	AH02; AH03; AH04; AH07; AH11; HP08; HP11; HP17	2003 (Peter Messick, Greenwood & Assoc.); 2010 (Michael Sampson and Mary Garrett, State of Calif., Dept of Parks & Rec.)	LA-06335, LA-08531, LA-11141, LA-11404
P-19-003181	CA-LAN-003181H	Resource Name - J. M. Griffith Co. Planing Mill and Lumber Yard	Site	Historic	AH02; AH04	2004 (Alice Hale, Greenwood & Associates)	LA-08533, LA-12583

Resource List

24-15622 William Mead

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-003650	CA-LAN-003650H	Resource Name - Bovinae Cranial Fragments; Other - S-2005LMM1004	Site	Historic	AH04	2005 (Leann Moore, Cogstone Resource Management)	LA-11404
P-19-004182	CA-LAN-004182H	Resource Name - North Spring Street Track Remnant	Site	Historic	AH07	2011 (John M. Foster, Greenwood & Associates)	
P-19-004183	CA-LAN-004183H	Resource Name - College Street Pavement	Site	Historic	AH02	2011 (John M. Foster, Greenwood & Associates)	LA-11404
P-19-004200	CA-LAN-004200H	Resource Name - Alameda Street Brick Pavement, ALA-H-002	Site	Historic	AH07	2007 (Adela L. Amaral, AECOM)	LA-12583
P-19-004201	CA-LAN-004201H	Resource Name - Naud's Junction, ALA-H-001	Site	Historic	AH02; AH16	2007 (Adela L. Amaral, AECOM)	LA-12583
P-19-004202	CA-LAN-004202H	Resource Name - North Alameda Street Railroad Tracks, ALA-H-003; Other - Southern Pacific Railroad	Site	Historic	AH07	2007 (Adela L. Amaral, AECOM)	LA-12583
P-19-004601	CA-LAN-004601H	Resource Name - 2872-Blossom Plaza-1	Site	Historic	AH02; AH04; AH11; HP05; HP36	2014 (L. Furnis, E. Nocolay, N. Rogers, M. Wiseman, Cogstone Resources Management)	LA-13146
P-19-004648	CA-LAN-004648H	Resource Name - DIV13-H-001	Site	Historic	AH04; HP02; HP28	2015 (Reily Murphy, AECOM)	
P-19-004649	CA-LAN-004649H	Resource Name - DIV13-H-002	Site	Historic	AH02; AH04; HP02	2012 (Frank Humphries, AECOM)	
P-19-004650	CA-LAN-004650H	Resource Name - DIV13-H-003	Site	Historic	AH04; HP02	2012 (Frank Humphries, AECOM)	
P-19-004651	CA-LAN-004651H	Resource Name - DIV13-H-004	Site	Historic	AH04; HP02	2012 (Reily Murphy, AECOM)	
P-19-004652	CA-LAN-004652H	Resource Name - DIV13-H-005	Site	Historic	AH02; AH04; HP02	2013 (Frank Humphries, AECOM)	
P-19-004653	CA-LAN-004653H	Resource Name - DIV13-H-006	Site	Historic	AH04; HP02	2013 (Frank Humphries, AECOM)	
P-19-004654	CA-LAN-004654H	Resource Name - DIV13-H-007	Site	Historic	AH04; HP02	2013 (Frank Humphries, AECOM)	
P-19-004655	CA-LAN-004655H	Resource Name - DIV13-H-008	Site	Historic	AH04; HP02	2013 (Frank Humphries, AECOM)	
P-19-004656	CA-LAN-004656H	Resource Name - California Star Winery; Resource Name - DIV13-H-009	Site	Historic	AH02; AH04; AH11	2012 (Frank Humphries, AECOM)	
P-19-004657	CA-LAN-004657H	Resource Name - DIV13-H-010	Site	Historic	AH04; HP02	2012 (Frank Humphries, AECOM)	
P-19-004658	CA-LAN-004658H	Resource Name - Southern California Gas Company Macy Street Plant; Resource Name - DIV13-H-011	Site	Historic	AH02; AH04; AH06	2013 (Frank Humphries, AECOM)	
P-19-004659	CA-LAN-004659H	Resource Name - DIV13-H-012	Site	Historic	AH06; HP28	2013 (Frank Humphries, AECOM)	

Resource List

24-15622 William Mead

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-004660	CA-LAN-004660H	Resource Name - Cesar Chavez Ave, Macy St; Los Angeles Railway, B-line; Resource Name - DIV13-H-013	Site	Historic	AH07; HP18	2013 (Frank Humphries, AECOM)	
P-19-004661	CA-LAN-004661H	Resource Name - Cudahy Packing Company; Resource Name - DIV13-H-014	Site	Historic	AH11; HP06	2014 (Frank Humphries, AECOM)	
P-19-004662	CA-LAN-004662	Resource Name - DIV13-P-001	Site	Prehistoric	AP09	2013 (Frank Humphries, AECOM)	
P-19-100881		Resource Name - MTA-G-08-Isolate-1; Other - 1800 Baker St. Yard	Object	Historic	AH16	2009 (K. Richardson, M. Phil, ArchaeoPaleo Resource Management)	LA-10806
P-19-150244		OHP Property Number - 166230; Resource Name - 1709 N Spring St; Other - Map Reference #2	Building	Historic	HP08	2002 (Herbert, Rand, JRP Historical Consulting Services)	
P-19-150245		OHP Property Number - 166231; Resource Name - 1701 N Spring St; Other - Map Reference #3	Building	Historic	HP08	2002 (Herbert, Rand, JRP Historical Consulting Services)	
P-19-150246		OHP Property Number - 166232; Resource Name - New York Suspender Factory; Other - Map Reference #4	Building	Historic	HP08	2002 (Herbert, Rand, JRP Historical Consulting Services)	
P-19-150329		OHP Property Number - 024931, 024932; Resource Name - Fritz Estate; Resource Name - Samuel M Storer Residence; Other - Los Angeles Chinatown Heritage & Visitors Center; Voided - 19-170951; Voided - 19-170952	Building	Historic	HP02	1982 (Roger G. Hatheway, Hatheway & Associates); 1995 (D.N.Slawson, Greenwood & Associates)	LA-04452, LA-11404
P-19-167098		OHP Property Number - 021040; Resource Name - San Antonio Winery; Other - Winery	Building	Historic	HP06	1974 (Tom Sitton, Natural History Museum)	
P-19-170901		OHP Property Number - 024881; Resource Name - Chinatown District (E of Hill St)	District	Historic	HP36	1982 (R. Hatheway, R.G. Hatheway & Associates)	LA-04452, LA-11404

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-170949		OHP Property Number - 024929; Resource Name - Chinatown District (W of Hill St)	District	Historic	HP36	1982 (R. Hatheway, R. G. Hatheway & Associates)	LA-04452, LA-11404
P-19-170956		Resource Name - Charles B. Wellman Residence; OHP Property Number - 024936	Building	Historic	HP02	1982 (Roger G. Hatheway, Hatheway & Associates)	LA-04452
P-19-170957		OHP Property Number - 024937; Resource Name - Capitol Milling Co; Other - Mill of Abel Stearns; Other - Eagle Mills	Building	Historic	HP06	1974 (T. Sitton, Natural History Museum); 1982 (Hatheway, Roger, R. G. Hatheway)	LA-04452
P-19-170973		OHP Property Number - 024956; Resource Name - Los Angeles Terminal Annex Post Office; Other - Post Office Terminal Annex	Building	Historic	HP14	1982 (T. Jacques, S. Carrico, Westec Services); 1984 (D. Robertson, Beland Associates)	LA-04623, LA-12583
P-19-171574		OHP Property Number - 025585; Resource Name - Chevron Station	Building	Historic	HP09	1981	LA-12583
P-19-174919		OHP Property Number - 090604; Resource Name - Portola Trail Campsite #1; CHL - 655	Site	Historic	HP37	1980 (J. Arbuckle)	
P-19-176368		OHP Property Number - 100984; Resource Name - DWP; Resource Name - General Services Headquarters Historic District	District	Historic	HP09	1994 (McAvoy, Christy J., Historic Resources Group); 2019; 2022 (Monica Wilson, AECOM)	

Resource List

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-186110		Resource Name - Union Pacific RR, Hobart Tower; Other - Union Pacific RR; Other - C-Los Angeles-A-1; Other - #33, 34, & 100; Other - Hobart Tower	Structure	Historic	HP11; HP17; HP39	1999 (S. Ashkar, Jones & Stokes); 2002 (D. Livingstone and C. Hamilton, Applied Earthworks); 2007 (Francesca G. Smith and Caprice D. Harper, Parsons); 2018 (Jessica B. Feldman, ICF); 2019 (Jenna Kachour, GPA)	LA-04834, LA-07532, LA-07658, LA-07662, LA-07664, LA-07934, LA-07943, LA-08315, LA-08857, LA-08858, LA-08862, LA-08892, LA-09115, LA-09190, LA-09634, LA-09635, LA-09636, LA-09638, LA-09649, LA-09900, LA-10199, LA-10284, LA-10285, LA-10320, LA-10324, LA-10430, LA-10452, LA-10506, LA-10541, LA-10633, LA-11048, LA-11346, LA-11429, LA-11506, LA-11719, LA-12019, LA-12211, LA-12302, LA-12349, LA-12434, LA-12446, OR-02094, OR-03861

Resource List

24-15622 William Mead

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-186112		Resource Name - Union Pacific RR, Southern Pacific R R Los Angeles Division; Other - C-Los Angeles-A-1; Other - MetroLink Riverside Line; Other - SPRR Los Angeles Division; Other - SPRR Sunset Line; Other - Map Reference #2-35	Structure	Historic	AH07; HP11; HP39	1999 (S. Ashkar, Jones & Stokes); 2002 (Rand F. Herbert, JPR Historical Consulting Services); 2009 (R. Ramirez and F. Smith, SWCA Environmental Consultants); 2009 (F. Smith and J. Steely, SWCA Environmental Consultants); 2012 (Alyssa Newcomb, SWCA Environmental Consultants); 2018 (Audrey von Ahrens, GPA); 2019 (Jenna Kachour, GPA)	LA-04835, LA-05125, LA-05501, LA-05643, LA-07528, LA-07834, LA-07943, LA-07954, LA-08231, LA-08249, LA-08298, LA-08299, LA-08517, LA-08635, LA-08667, LA-08671, LA-08701, LA-08703, LA-08744, LA-08821, LA-08822, LA-08826, LA-08827, LA-08911, LA-09156, LA-09199, LA-09236, LA-09441, LA-09660, LA-09795, LA-09880, LA-09894, LA-10189, LA-10284, LA-10299, LA-10323, LA-10340, LA-10394, LA-10513, LA-10638, LA-10698, LA-10911, LA-10997, LA-10998, LA-11048, LA-11180, LA-11253, LA-11537, LA-11775, LA-11821, LA-11988, LA-11989, LA-12133, LA-12211, LA-12212, LA-12349, LA-12499, LA-12526, LA-12552, LA-12558, LA-12697, LA-12928, LA-13458, VN-03153
P-19-186721		Resource Name - ATA BOY Inc	Building	Historic	HP08	2002 (D. Slawson, Greenwood & Associates)	LA-10541

Resource List

24-15622 William Mead

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-187085		Resource Name - The Mojave Rd;	Structure, Other	Historic	HP37	1989 (S. Elder); 2014 (Marc Beherec, AECOM)	LA-12788, LA-12808, LA-13259
P-19-188007		Resource Name - Old San Fernando Rd; Other - San Fernando Rd	Building, Structure	Historic	HP37	2006 (J. McKenna, McKenna et al); 2011 (C. Ehringer, ESA)	LA-10671, LA-12047, LA-12526, LA-12733, LA-13252, VN-03153
P-19-188246		OHP Property Number - 163640; Resource Name - Mission Tower, AT & SF Tower; Other - Former address: 1440 Alhambra	Building	Historic	HP17	2002 (A. Carlisle & K. Lain, Myra L Franck)	LA-10638
P-19-190309		OHP Property Number - 172542; Resource Name - Zanja Madre	Structure	Historic	AH06	2008 (Christeen Taniguchi, Galvin Preservation Associates); 2014 (Carren Jao, KCET)	LA-13239
P-19-191149		Resource Name - Agricultural Chemical Company	Building	Historic	HP08	2011 (Peter Moruzzi, ICF International)	LA-12894
P-19-192235		Resource Name - Los Angeles County Sheriff's Men's Central Jail	Building	Historic	HP14; HP39	2015 (Jeanette McKenna, McKenna et al.)	LA-13104
P-19-192470		Resource Name - Basso Auto Building	Building	Historic	HP06	2017 (Amanda Kainer, ESA)	
P-19-192482		Resource Name - Bridge #53C-859; Resource Name - N Spring St Bridge; Resource Name - Spring St Bridge; Other - HAER CA-275	Structure	Historic	HP19	(Portia Lee)	LA-07425, LA-07426
P-19-192483		Resource Name - Bridge #53C-1010; Resource Name - N Main St Bridge; Resource Name - Main St Bridge; Other - HAER CA-276	Structure	Historic	HP19	2000 (Elizabeth Watson)	LA-04043, LA-07425, LA-07426

Resource List

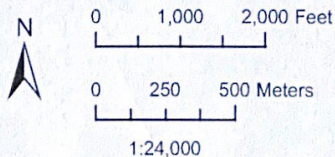
24-15622 William Mead

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-192484		Resource Name - Bridge #53C-130; Resource Name - Cesar Chavez Avenue Bridge; Resource Name - Macy St Bridge; Resource Name - Macy St Viaduct; Resource Name - Cesar Chavez Avenue Viaduct; Other - HAER CA-277	Structure	Historic	HP19	(Elizabeth Watson)	LA-04219, LA-07425, LA-07426



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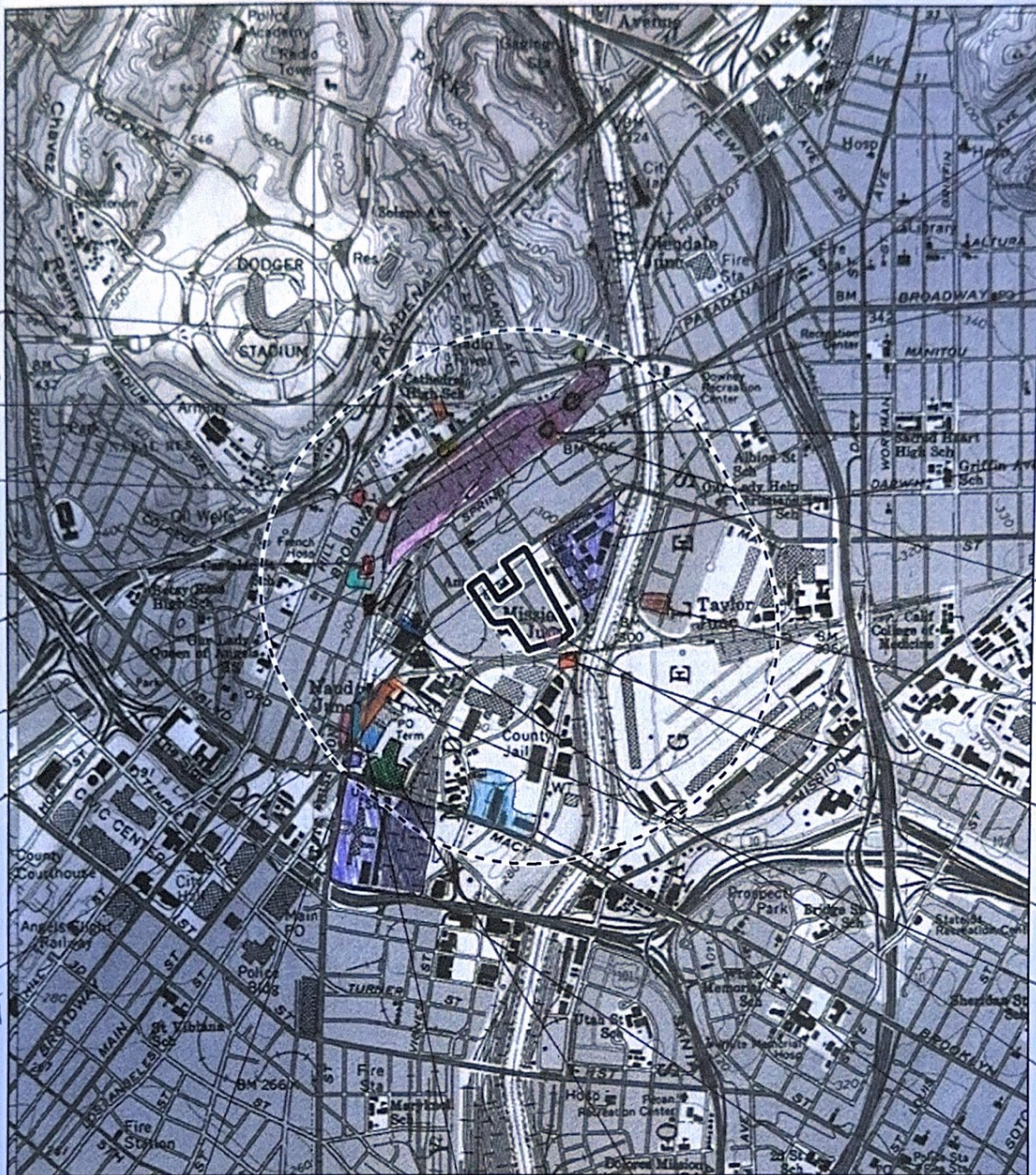
--- Half-Mile Buffer
 ■ Area of Potential Effects



Records Search Map

Resources 3/2

Cultural Resources Study



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--- Half-Mile Buffer
 — Area of Potential Effects



0 1,000 2,000 Feet
 0 250 500 Meters
 1:24,000

Records Search Map

Rincon Consultants, Inc.



1/4

Record Search Resources Proximity Sheet

Project Name: 24-15622 William Mead Historic Assessment

Resource Number	Within Project Site	Adjacent to Project Site	Outside of Project Site
192483			X
192482			X
192470			X
192484			X
186112		X	
191199			X
186110			X
disregard outside 188007			
190309			X
3650			X
150246			X
186721			X
150245			X
150244			X
100881			X
187085			X



2/4

Record Search Resources Proximity Sheet

Project Name: 24-15622 William Mead Historic Assessment

Resource Number	Within Project Site	Adjacent to Project Site	Outside of Project Site
192235		X	
170901			X
170949			X
3102			X
3120			X
3100			X
3101			X
174919			X
4182			X
1882462		X	
176308		X	
150329			X
170957			X
004601			X
167098			X
002828	X		



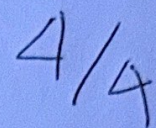
3/4

Record Search Resources Proximity Sheet

Project Name:

24-15622 William Mead Historic

Resource Number	Within Project Site	Adjacent to Project Site	Outside of Project Site
004200H			X
003103			X
4183			X
4201H			X
4202H			X
1575H			X
4648			X
4649			X
4657			X
4659			X
4658			X
4661			X
4656			X
4655			X
4660			X
4654			X



Record Search Resources Proximity Sheet

Project Name: 24-15622 William Mead Historic

[illegible]

Appendix B

Native American Heritage Commission Sacred Lands File Search Results



NATIVE AMERICAN HERITAGE COMMISSION

February 28, 2024

Ashley Losco
Rincon Consultants, Inc.Via Email to: alosco@rinconconsultants.com**Re: 24-15622 William Mead Homes Project, Los Angeles County**

To Whom It May Concern:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Gabrieleno Band of Mission Indians – Kizh Nation on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green
Cultural Resources Analyst

Attachment

CHAIRPERSON
Reginald Pagaling
ChumashVICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
NomlakiSECRETARY
Sara Dutschke
MiwokPARLIAMENTARIAN
Wayne Nelson
LuiseñoCOMMISSIONER
Isaac Bojorquez
Ohlone-CostanoanCOMMISSIONER
Stanley Rodriguez
KumeyaayCOMMISSIONER
Laurena Bolden
SerranoCOMMISSIONER
Reid Milanovich
CahuillaCOMMISSIONER
VacantEXECUTIVE SECRETARY
**Raymond C.
Hitchcock**
Miwok, Nisenan**NAHC HEADQUARTERS**
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Appendix C

Update California Department of Parks and Recreation 523 Series Forms

*Recorded by: James Williams, Rincon Consultants

*Date: 3/13/2024

☐ Continuation ☒ Update

William Mead Homes was first recorded and evaluated for historical significance in 2002, when HRG documented the property as part of the City of Los Angeles Section 106 Review. The 2002 record describes the resource as a public housing complex consisting of 24 apartment buildings and a community building constructed as a Modern-style garden apartment property. As a result of the 2002 evaluation, William Mead Homes was recommended eligible as a historic district under NRHP Criterion A "for its association with the development of public and defense worker housing in Los Angeles during the Second World War and under NRHP Criterion C as a Los Angeles public housing development based on the planning and design principles of the Garden City and Modern movements" (HRG 2002). Its period of significance begins in 1943 with the completion of the complex and concludes in 1952, though no explicit rationale is provided for the period of significance. Character-defining features of the district that embody the principles of Garden City planning and Modern architecture include superblock spatial organization and orientation of buildings, low massing of up to three stories in height, and Modern architectural characteristics, such as including the "standardization and repetition of building types" (HRG 2002). The district is generally bounded by North Main Street on the north, East Emyra Street and private property on the west, Leroy Street on the east, and Bolera Land and the UPRR ROW on the south, excluding the Ann Street School, located at the north end of the district.

On March 3, 2002, the California State Historic Preservation Officer concurred with the 2002 recommendation (DOE-19-02-0322-0000). As a result, the property was automatically listed in the CRHR.

Three subsequent recordations confirmed the continued eligibility of the William Mead Home property for the NRHP and CRHR. In 2011, Kathryn McGee revisited the property in 2011 in support of the Historic Resources Survey of the Cornfield Arroyo Seco Specific Plan, concluding the property retained integrity. The DPR forms prepared in 2011 list status codes of 2S2, 3CS (appears individually through survey evaluation), and 5S3 (Appears to be individually eligible for local listing or designation through survey evaluation, McGee 2011).

In 2016, Daniel Paul revisited the property as part of the Link US Historical Resources Evaluation Report. It was confirmed the property remained eligible for inclusion in NRHP, as recommended in 2002 (Paul 2016).

In 2017, Amanda Duane of GPA Consulting revisited the property, recommending the property remained eligible under NRHP Criteria A and C and CRHR Criteria 1 and 3 and that the previous 2S2 status code was still applicable (Duane 2017). The 2017 recordation described the district's character-defining features as follows:

The character-defining features of the property include the overall site layout, particularly the diagonal axis that helped to ensure each unit got optimal sunlight and the communal grassy areas surrounding each building. The buildings themselves are characterized by their two-story height, flat roofs, emphasis on horizontality, regular fenestration, and red brick cladding.

On February 27, 2024, Architectural Historian James Williams of Rincon Consultants revisited William Mead Homes in support of the William Mead Homes Project Cultural Resources Impacts Report. The survey confirmed that the descriptions of the property provided in the previous recordations are accurate. As described in previous recordations, the district consists of six superblocks delineated by an internal street network and containing a series of two-to-three-story apartment buildings and a community building. The apartment buildings are of standardized design, with features including a rectangular or L-plan, brick and concrete construction, flat roofs with broad overhangs, cantilevered overhangs at the second story, and regularly spaced steel casement windows. The apartment buildings have incurred only limited alteration. Changes vary from building to building but generally include some combination of limited replacement of windows, including with modern vinyl and horizontally sliding aluminum sashes; replacement of exterior doors; installation of metal security doors; installation of steel balcony rails; and construction of accessibility ramps.

Blocks contain four or five apartment buildings each. Outside building footprints, the blocks are landscaped with lawns, mature trees of various species, and various ornamental plants. Landscaped areas are interspersed with concrete walkways and concrete-paved areas with common clothes lines. Other features occupying common space on the blocks include a modern preschool facility fronting Leroy Street between North Main and Magdalena streets and play equipment at three locations throughout the district.

The street grid is a semi-regular grid of low-capacity roads. In addition, there is a small historic parking lot at the south end of the district and a baseball diamond in the district's southwest corner.

The survey confirmed that the resource retains sufficient integrity to remain eligible for listing in the NRHP.

*Recorded by: James Williams, Rincon Consultants

*Date: 3/13/2024

☐ Continuation ☒ Update

Photographs:

Overview of Representative Apartment Building at William Mead Homes



Representative View of Common Space Between Apartment Buildings



*Recorded by: James Williams, Rincon Consultants

*Date: 3/13/2024

☐ Continuation ☒ Update

Photographs:

Representative View of Common Space Between Apartment Buildings



Representative View Down Internal Street



Page 4 of 5

*Resource Name or # William Mead Homes

*Recorded by: James Williams, Rincon Consultants

*Date: 3/13/2024

☐ Continuation ☒ Update

Photographs:

William Mead Homes Community Building, North and East Elevations



References:

Duane, Amanda

2017 California Department of Parks and Recreation series 523 forms: William Mead Homes. On file at Rincon Consultants, Los Angeles, CA.

Historic Resources Group (HRG)

2002 California Department of Parks and Recreation series 523 forms: William Mead Homes. On file at Rincon Consultants, Los Angeles, CA.

McGee, Kathryn

2011 California Department of Parks and Recreation series 523 forms: 1300 N. Cardinal Street (William Mead Homes). On file at Rincon Consultants, Los Angeles, CA.

Paul, Daniel

2016 California Department of Parks and Recreation series 523 forms: William Mead Homes. On file at Rincon Consultants, Los Angeles, CA.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
LOCATION MAP

Primary #
HRI#
Trinomial

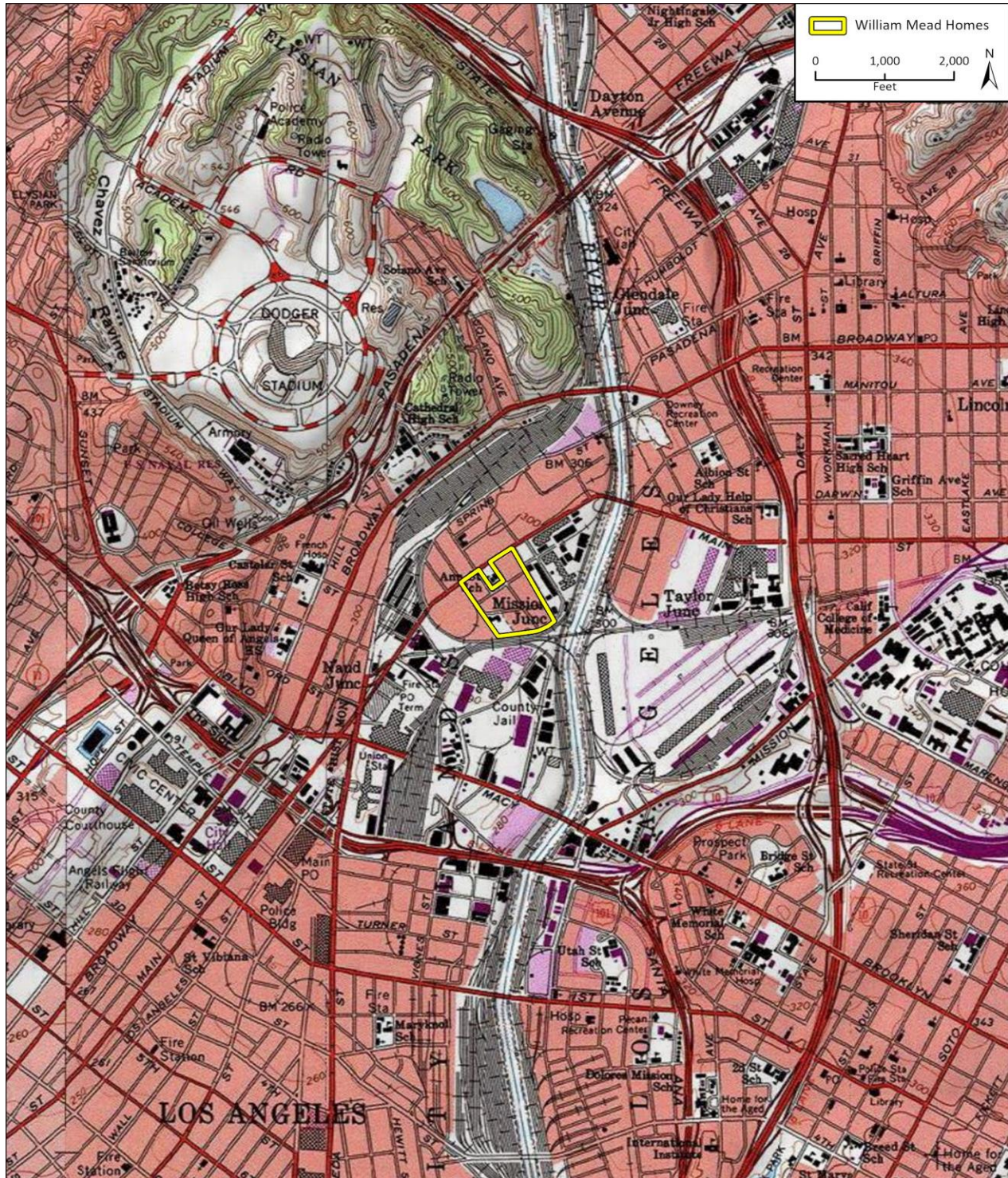
Page 5 of 5

*Resource Name or # William Mead Homes

*Map Name: Los Angeles, CA

*Scale: 1:24,000

*Date of map: 1966



CONTINUATION SHEET

Page 2 of 2

The property was re-surveyed as a part of the California High-Speed Rail Authority Burbank to Los Angeles Section Historic Architectural Survey Report in August 2016. Based on visual observation, the property retains sufficient integrity to convey its significance, and the status code of 2S2 is still valid.

The boundaries of the historic property are U-shaped and are generally bounded by Main Street to the north, Leroy Street to the east, the railroad tracks to the south, and Elmyra Street to the west (see Sketch Map on page 1). These boundaries coincide with the extent of the original public housing development. The character-defining features of the property include the overall site layout, particularly the diagonal axis that helped to ensure each unit got optimal sunlight and the communal grassy areas surrounding each building. The buildings themselves are characterized by their two story height, flat roofs, emphasis on horizontality, regular fenestration, and red brick cladding.

P5a. Photograph



View looking southwest at Building 14 from the corner of Cardinal Street and Leroy Street, 7/19/16



View looking southwest into common space between Buildings 15 and 16 from Leroy Street, 7/19/16



View looking west at northeast end of Building 14 from Leroy Street, 7/19/16



View looking south at northeast end of Building 14 from Leroy Street, 7/19/16

State of California • The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #
HRI # 163645
Trinomial

Page 1 of 1 *Resource Name or # William Mead Homes

*Recorded by: Daniel Paul *Date: July 21, 2016 o Continuation ☐ Update

CHR Status Code: 2S2, remains unchanged

Address: (As listed in HRI) 1300 Cardinal St. Los Angeles, CA 90012

Assessor's Parcel Number:

Present Use: Residential- Public Housing

Historic Name: William Mead Homes

Owner and Address: Housing Authority of Los Angeles
2600 Wilshire Blvd.
Los Angeles, CA 90057

The William Mead Homes property was previously surveyed in 2002, and the California Historic Resource Code was determined to be 2S2: (Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.). William Mead Homes is presently listed in the California Historic Resources Inventory with a 2S2 status code. SHPO concurred with this finding by Project Review DOE-19-02-0322-0000, dated 03/03/2002.

A site visit was conducted on July 21, 2016, to verify existing conditions of the resource located at 1300 Cardinal St. The previous survey information recorded on the attached 2002 DPR 523 form, including the 2S2 status code, remains accurate.



William Mead Homes apartment building. Camera facing southwest. ICF International, 11/7/2014

Survey Type: Intensive Survey Effort
Section 106 Compliance
P—Project Review

Report Citation: Link US Historical Resources Evaluation Report

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # _____
HRI # _____
Trinomial _____
NRHP Status Code 2S2

Other Listings 3CS, 5S3

Review Code _____ Reviewer _____ Date _____

Page 1 of 2 *Resource Name or #: (Assigned by recorder) 1300 N Cardinal St

P1. Other Identifier: William Mead Homes

*P2. Location: Not for Publication ☒ Unrestricted *a. County Los Angeles and (P2b and P2c or P2d.)

*b. USGS 7.5' Quad: Los Angeles Date: 1994 T: 01.0S; R: 13.0W; S: 22

c. Address: 1300 N Cardinal St City: Los Angeles Zip: 90012

d. UTM: (Give more than one for large and/or linear resources) Zone: _____ mE/ _____ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate): APN:5409012902

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Architectural Style: Moderne, elements of Architectural Style: International

Construction: brick

Siding/Sheathing: brick, all visible sides

Siding/Sheathing: poured concrete: painted, all visible sides

Roof: flat, multiple rooflines, narrow eaves

Fenestration: metal, casement, front, side, rear

Fenestration: metal, fixed, front, side, rear

Primary Entrance: front, side, rear, single door

Plan: irregular

No. Stories: 3, 27 buildings

Property Type: residential

Related: Poured concrete walkways, lawns, balconies with metal banisters, outdoor fixed laundry racks

Retains integrity: yes, setting, location, materials, workmanship, association, design, feeling

*P3b. Resource Attributes: (List attributes and codes) HP03

*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of photo:

(View, data, accession #)

03/09/11

*P6. Date Constructed/Age and

Sources: ☒ Historic

☐ Prehistoric ☐ Both

1942

Assessor

*P7. Owner and Address:

not known

*P8. Recorded by:

Kathryn McGee
Chattel Architecture, Planning and
Preservation
13417 Ventura Boulevard
Sherman Oaks, CA 91423

*P9. Date Recorded: 04/06/2011

*P10. Survey Type: (Describe)

Intensive

*P11. Report Citation: (Cite survey report and other sources or enter "none.")

Tanya Sorrell, Kathryn McGee, and Shane Swerdlow. Historic Resources Survey of the Cornfield Arroyo Seco Specific Plan. Prepared by LSA Associates and Chattel Architecture Planning and Preservation for Arup, April 2011

*Attachments: ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☐ Building, Structure, and Object Record
☐ Archeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record
☐ Rock Art Record ☐ Artifact Record ☐ Photograph Record ☐ Other (List): _____

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary # _____
HRI # _____
Trinomial _____

Page 2 of 2

*Resource Name or #: (Assigned by recorder) 1300 N Cardinal St

*Recorded By: Kathryn McGee *Date: 04/06/2011 _____ Continuation X Update

Update Status: Retains Integrity

The William Mead Homes is significant as one fo the first government housing projects in Los Angeles and is also significant for its Pre-War Modern architecture. Originally known as Ann Street project, William Mead Homes was constructed c. 1942 and partially occupied by 1943. It is located in the industrial area east of Downtown, situated on 15-acre tract located north of the Union Pacific Rail Line and bounded by E. Elmyra St and Bolero Ln to the south and west and Leroy St and N. Main St to the east and north. It includes multiple standardized, rectangular and L-shaped apartment buildings configured around communal and outdoor spaces, a leasing office and the Ann Street Elementary School. It was designed to accommodate 449 families and its estimated cost of construction in 1940 was \$2,100,000 ("One Housing Project Wins," LA Times, 13 Dec 1940). In 1941, President Roosevelt approved a \$1,862,100 U.S. Housing Authority loan to the City of Los Angeles for construction of the project, covering about 90 percent of the estimated cost of construction. The land for the project was purchased by the Los Angeles Housing Authority from Consolidated Steel Corporation for \$20,000 an acre. Over 100 dwellings were demolished to make way for the project ("President Approves Loan for Slum Clearance Here," LA Times, 13 March 1941). The early nickname for the area, "Dog Town," comes from the site's historical proximity to a dog pound.

PRIMARY RECORD

Other Listings

Review Code _____ Reviewer _____ Date _____

Primary #
HRI#
Trinomial
NRHP Status Code 2S2

Page 1 of 10 Resource Name or #: William Mead Homes

P1. Other Identifier:

P2. Location: ☐ Not for Publication ☒ Unrestricted
and (P2b and P2C or P2d. Attach a Location Map as necessary.)

a. County Los Angeles

b. USGS 7.5' Quad Date T ; R ; 1/4 of 1/4 of Sec ; B.M.

c. Address 1300 N CARDINAL ST City Los Angeles Zip 90012

d. UTM: Zone ; mE/ mN

e. Other Locational Data:

P3a. Description:

The property contains a multiple family public housing complex located north of downtown Los Angeles in an industrial area between North Main Street and the Los Angeles River. The seventeen-acre property is bounded by Main Street on the north, Leroy Street on the east, the Southern Pacific railroad tracks on the south, and Elmyra Street on the west. Ann Street School is located at the north end of the site; the project surrounds the school on three sides. Five streets are located within the complex: East Ann Street, Magdalena Street, Cardinal Street, Bloom Street, and Bolero Lane. Twenty-four apartment structures containing 449 dwelling units occupy the six large blocks that comprise the project. A community building is located on Cardinal Street on the southwest side of the complex.

The apartment buildings are rectangular in plan and arranged in groups to create a series of courtyards throughout the complex. In several locations, two facing L-shaped groups frame a square courtyard. North of Cardinal Street the buildings are arranged parallel

(See Continuation Sheet)

P3b. Resources Attributes: 03 Multiple Family Property

P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other



P5b. Description of Photo:

P6. Date Constructed/Age and Sources: ☒ Historic ☐ Both
☐ Prehistoric
1942-43 (F)

P7. Owner and Address:

Housing Authority of the City of
Los Angeles

P8. Recorded by:

Historic Resources Group
1728 Whitley Ave., Hollywood, CA
90028

P9. Date Recorded: 3/18/2002

P10. Survey Type:

City of Los Angeles Section 106
Review.

P11. Report Citation: None.

Attachments: ☐ NONE ☐ Location Map ☒ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record
☐ Archaeological Record ☒ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record
☐ Artifact Record ☐ Photograph Record ☐ Other:
DPR 523A (1/95)

CONTINUATION SHEET

Page 2 of 10

Resource Name or #: William Mead Homes

Recorded by: **Historic Resources Group**

Date: 3/18/2002

☒ Continuation ☐ Update**P3a. Description, continued:**

or perpendicular to the surrounding streets. South of Cardinal Street, which runs diagonally across the complex creating irregular shaped blocks, the buildings maintain this arrangement despite the change in the street pattern.

All of the buildings are two or three stories in height and constructed of reinforced brick with concrete slab floors and roofs. They have flat roofs with slightly overhanging eaves and red brick exterior walls. Each story is separated by a solid course of concrete. The housing units extend the width of each building with all the front entrances on the same elevation. Units typically feature concrete stoops, single front door openings, and several window openings of varying sizes. The fenestration consists of original metal casement windows throughout. Units on the upper floors are accessed by balcony walkways with metal pipe railings.

The property is in good condition and retains a high degree of integrity. Each of the twenty-four apartment buildings and the community building remain in their original location. No major alterations have been made to the complex.

BUILDING, STRUCTURE, AND OBJECT RECORD

Page 3 of 10

NRHP Status Code 2S2

Resource Name or #: William Mead Homes

B1. **Historic Name:** William Mead HomesB2. **Common Name:** William Mead HomesB3. **Original Use:** Public Housing/War HousingB4. **Present Use:** Public HousingB5. **Architectural Style:** Modern Garden ApartmentsB6. **Construction History:**B7. **Moved?** ☒ No ☐ Yes ☐ Unknown**Date:** **Original Location:**B8. **Related Features:**B9a. **Architect:** Housing Associatesb. **Builder:** Housing Authority City of Los Angeles;The Baruch Corp.B10. **Significance:** **Theme** Public Housing; World War II Housing; Modern Planning **Area** City of Los Angeles**Period of Significance** 1943-1952 **Property Type** Public Housing/Garden Apartment Complex **Applicable Criteria** A and C

William Mead Homes is eligible for listing in the National Register of Historic Places at the local level of significance under Criteria A and C. It is significant under Criterion A for its association with the development of public and defense worker housing in Los Angeles during the Second World War, and under Criterion C as a Los Angeles public housing development based on the planning and design principles of the Garden City and Modern movements.

B11. **Additional Resource Attributes:**B12. **References:** See continuation sheet.B13. **Remarks:**B14. **Evaluator:** Historic Resources Group, 1728 Whitley Ave., Hollywood, CA 90028**Date of Evaluation:** 3/18/2002

(This space reserved for official comments.)

DISTRICT RECORD

Page 4 of 10

NRHP Status Code 2S2

Resource Name or #: William Mead Homes

D1. Historic Name:**D2. Common Name:****D3. Detailed Description:**

The property contains a multiple family public housing complex located north of downtown Los Angeles in an industrial area between North Main Street and the Los Angeles River. The seventeen-acre property is bounded by Main Street on the north, Leroy Street on the east, the Southern Pacific railroad tracks on the south, and Elmyra Street on the west. Ann Street School is located at the north end of the site; the project surrounds the school on three sides. Five streets are located within the complex: East Ann Street, Magdalena Street, Cardinal Street, Bloom Street, and Bolero Lane. Twenty-four apartment

(See Continuation Sheet)

D4. Boundary Description:

The seventeen-acre property is bounded by Main Street on the north, Leroy Street on the east, the Southern Pacific railroad tracks on the south, and Elmyra Street on the west. Ann Street School is located at the north end of the site; the project surrounds the school on three sides. Five streets are located within the complex: East Ann Street, Magdalena Street, Cardinal Street, Bloom Street, and Bolero Lane.

D5. Boundary Justification:

The boundaries of the historic district are the original boundaries historically associated with William Mead Homes.

D6. Significance: Theme Early Public Housing; World War II Housing; Modern Planning **Area** City of Los Angeles
Period of Significance 1943-1952 **Applicable Criteria** A and C

William Mead Homes is eligible for listing in the National Register of Historic Places at the local level of significance under Criteria A and C. It is significant under Criterion A for its association with the development of public and defense worker housing in Los Angeles during the Second World War, and under Criterion C as a Los Angeles public housing development based on the planning and design principles of the Garden City and Modern movements.

Criterion A

William Mead Homes is a public housing project located just north of downtown Los Angeles. Constructed in 1942-43 by the Housing Authority of the City of Los Angeles (HACLA), the development was funded with federal funds allocated under the United States Housing Act (also known as the Wagner-Steagall Act) in 1937. This law initiated the construction of public housing across the United States, leaving the design and construction details to local authorities.

During the Great Depression, overcrowding, homelessness, and dilapidated housing were major problems in Los Angeles. Private housing construction slowed dramatically, while the population increased. According to the Real Property Inventory

(See Continuation Sheet)

D7. References:

(See Continuation Sheet)

D8. Evaluator: Christy Johnson McAvoy**Date** 3/18/2002**Affiliation and Address:** Historic Resources Group, 1728 Whitley Ave., Hollywood, CA 90028

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☒ Continuation ☐ Update**D3. Detailed Description, continued:**

structures containing 449 dwelling units occupy the six large blocks that comprise the project. A community building is located on Cardinal Street on the southwest side of the complex.

The apartment buildings are rectangular in plan and arranged in groups to create a series of courtyards throughout the complex. In several locations, two facing L-shaped groups frame a square courtyard. North of Cardinal Street the buildings are arranged parallel or perpendicular to the surrounding streets. South of Cardinal Street, which runs diagonally across the complex creating irregular shaped blocks, the buildings maintain this arrangement despite the change in the street pattern.

All of the buildings are two or three stories in height and constructed of reinforced brick with concrete slab floors and roofs. They have flat roofs with slightly overhanging eaves and red brick exterior walls. Each story is separated by a solid course of concrete. The housing units extend the width of each building with all the front entrances on the same elevation. Units typically feature concrete stoops, single front door openings, and several window openings of varying sizes. The fenestration consists of original metal casement windows throughout. Units on the upper floors are accessed by balcony walkways with metal pipe railings.

The property is in good condition and retains a high degree of integrity. Each of the twenty-four apartment buildings and the community building remain in their original location. No major alterations have been made to the complex.

D6. Significance, continued:

in 1939, 7,702 people lived in units with no inside toilet facilities. A year later, the 1940 Census found 19,039 families living in overcrowded conditions.

Emigration to Los Angeles from other parts of the country exacerbated the problem. During the late 1930s and early 1940s, thousands of workers arrived in Los Angeles seeking industrial jobs in the city's emerging aircraft assembly and ship building industries. In 1941, for example, "13,000 new workers were joining Los Angeles' industrial payroll each month" (Hise, 129).

The City of Los Angeles planned, designed, and constructed the apartments at William Mead Homes as part of a comprehensive program to alleviate these shortages, to eradicate slums, and to improve housing quality. A clause in the Wagner-Steagall Act, known as the "equivalent elimination clause," explicitly linked the policy of slum clearance to the construction of new public housing. The clause required local agencies to destroy "slum properties" in a quantity equal to the number of new dwelling units being constructed. Legislators believed that this requirement would eliminate the competition between the government and the private housing market. In 1938, HACLA began purchasing private property in areas designated as slums, often using the power of eminent domain, and developed plans for ten public housing complexes, including William Mead Homes.

The site selected for William Mead Homes included a mixture of single-family homes, warehouses, and industrial buildings with railroad tracks and freight yards surrounding the site. HACLA purchased the land and demolished the existing buildings on the site in 1941. They devised a new street plan and constructed the new housing project in the following two years.

The construction of William Mead Homes was interrupted by the outbreak of the Second World War. After the United States entered the war in December 1941, winning the war became the federal government's first priority. As part of its mobilization efforts, the government reassigned all new public housing projects still under construction as war housing for the purposes of national defense. This included William Mead Homes.

William Mead Homes opened to residents in April 1943. An article in Southwest Builder and Contractor announced, "William Mead Homes Housing Project Finished: Is Opened to Families of War Workers." According to a 1945 HACLA report, a total of

(Continued)

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☒ Continuation ☐ Update**D6. Significance, continued:**

2,165 persons resided at William Mead Homes during the war. After the war, the property again became public housing as many war worker families returned to other parts of the country, or found housing elsewhere.

William Mead Homes filled an essential need for new quality housing in Los Angeles in the early 1940s and during the Second World War. It remains in this same use today.

Criterion C

William Mead Homes is significant under Criterion C as a public housing development in Los Angeles based on the planning and design principles of the Garden City and Modern movements of the late 1930s and early 1940s. During this period, local architects and community planners adapted the principles of these movements and constructed innovative new forms of multiple family housing, including the city's first public housing developments, such as William Mead Homes.

The Garden City and Modern movements began in Europe and spread to the United States in the 1920s. Organizations such as the Regional Planning Association of America (RPAA) championed garden cities and advocated comprehensive planning based on social scientific research. Members of the RPAA included Clarence Stein, Edith Elmer Wood, Henry Wright, Lewis Mumford, and Catherine Bauer. The group was instrumental in the planning and construction of Radburn, a planned community in suburban New Jersey and one of the first garden cities in the United States. Radburn was highly regarded and often cited as a model application of modern concepts in planning and architecture. Garden city concepts employed at Radburn, including "superblock" development and the segregation of automobile and pedestrian traffic, were later applied to the development of large apartment complexes throughout the United States.

Within the RPAA, Catherine Bauer was regarded as an expert in new European housing types. In 1934, she authored the book *Modern Housing*, in which she argued that European housing programs had produced a completely different type of shelter and a new framework for producing it. The European programs were developed primarily by nonprofit organizations or the government, and master-planned as component parts of larger neighborhoods. Bauer defined this approach as the essence of "modern housing." She advocated the development of similar projects in the United States.

During the Great Depression, the federal government adopted many ideas proposed by Bauer and other New Deal housing reformers. For example, it responded to the slowdown in housing construction, overcrowding, and decline in housing quality across the country by undertaking "slum clearance, new town and public housing construction, mortgage insurance, and national planning" (Birch, 128).

A new multiple family housing type known as "garden apartments" emerged at this time. Characteristics of garden apartments include the use of superblocks in development of the site, the segregation of automobile and pedestrian traffic, low to medium density and building coverage, the standardization of building types with a maximum of three stories in height, and an emphasis on open space. The complexes were often Modern in character. Many housing reformers viewed the geometric forms, industrial materials, and spatial character common to Modern architecture as a symbolic break with traditional building forms and methods.

Other innovations existed in the site planning. By eliminating the street grid and the traditional lot pattern, architects could arrange the buildings in these complexes in new ways. The designs often featured U-shaped or L-shaped plans that created interior courtyards and oriented the buildings away from the street.

Housing reformers like Bauer believed that the physical form of these communities allowed for a healthier life. They contrasted the new developments with examples of the worst tenement housing, which was often dark and with poor air circulation. Reformers explained that buildings oriented around courtyards and open space provided the apartment units with more natural

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light and better air circulation. At a time when many low-income families, in urban as well as rural areas, lacked indoor plumbing in their homes, the presence of hot and cold water, a toilet, and a small shower or bathtub in each apartment was also promoted as a major benefit of the new housing type.

Many of these new housing projects included children's play spaces and community buildings as well. Reformers believed that the construction of common spaces and the application of modern technology to housing construction facilitated new social arrangements such as group childcare, and allowed for less household work and more collective ways of living.

In 1938, the Wyvernwood Apartments became the first garden apartment project built in the City of Los Angeles and the first to employ the ideals of contemporary housing reformers. While the Wyvernwood Apartments were under construction, HACLA developed plans for more public housing projects, including William Mead Homes. During a period when architectural commissions were few and a commitment to the social goals of modernism was high, HACLA attracted some of the most respected and innovative architects in Los Angeles to work on its projects. William Mead Homes was designed by a group known as Housing Associates, comprised of noted architects including David D. Smith, Herbert J. Powell, Norman F. Marsh, P. A. Eisen, A. R. Walker, and Armand Monaco. Marsh, Walker and Eisen were particularly notable in the architectural development of Los Angeles. Several examples of their work is listed in the National Register.

The application of Garden City and Modern principles to the development of public housing in Los Angeles is represented in the characteristics of William Mead Homes. These characteristics include the development of the site as a superblock; low building coverage and a maximum height of three stories; the placement and orientation of the buildings; and Modern architectural characteristics, including the standardization and repetition of building types.

Using the power of eminent domain, HACLA assembled dozens of individual parcels and demolished every building on the site intended for William Mead Homes. Magdalena Street was extended one block to the east, closing off the south sides of Elmyra and Ann Streets, and a new street named Cardinal was created parallel to the railroad tracks on the south end of the site. The architects designed the housing complex as a complete planning unit or superblock, reorienting the street pattern and placing the individual apartment buildings in a regular pattern across the seventeen-acre site. The selection of a site that surrounded an existing elementary school is also representative of the community planning approach advocated by contemporary city planners.

Working within the HACLA's goals for the number of units to be created while heeding the "equivalent elimination" clause, the project architects designed William Mead Homes with a low building coverage of approximately twenty-one percent. To accomplish these goals, HACLA designed many of the buildings to be three stories high, often the maximum height for these types of complexes. Architect Herbert Powell explained that, "due to the comparatively high density [compared to other public housing projects] required by the land value (approximately 30 dwelling units per acre), it was necessary to have a considerable portion of the project three stories high" (Powell, 8-9). Thus the architects were able to keep the project under three stories, minimize the building site coverage, maximize open space, and produce the required number of units.

The architects also designed the buildings at William Mead Homes in L-shaped groups to create interior courtyards. This configuration provided the desired amounts of natural light and air circulation in the apartment units. Writing about the project in 1943, architect Herbert J. Powell stated that the buildings were intentionally placed "diagonally on the compass" so that "practically every room gets sun during the day."

The architectural style of the buildings at William Mead Homes is typical of public housing projects from this period. The lack of exterior ornament, the presence of flat roofs, and the long horizontal lines created by the balconies reflected the modernist aesthetic favored by many contemporary housing reformers. Designs were repeated throughout the complex, as the standardization and repetition of type kept material costs down and created a sense of unity throughout the project.

The new planning and design concepts of the Garden City and Modern movements, and their adaptation by housing reformers to the development of public housing in the 1930s and 1940s, is evident in the design of William Mead Homes.

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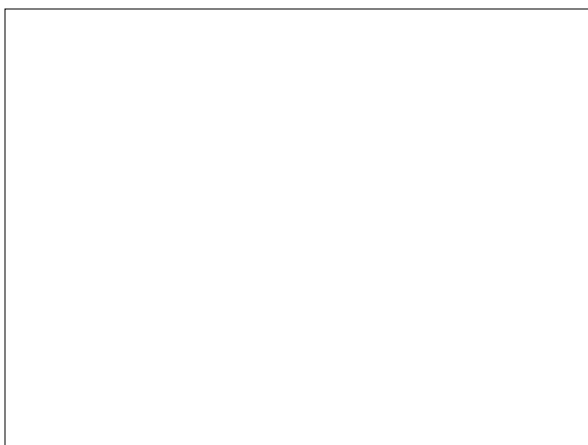
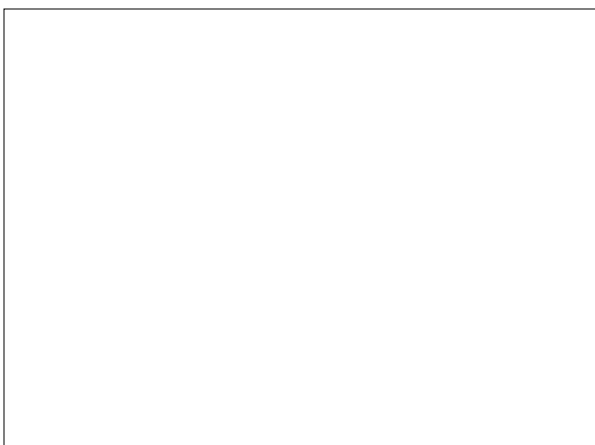
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Representative Photographs of the District:



SKETCH MAP

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Map of the Historic District:

